



**Department of
Social Services**

Human Resources
Administration

Department of
Homeless Services

W2-570
11/17

Office Of Audit &
Quality Assurance

April 2, 2019

Steven Danks
Commissioner

Mr. Stephen Lynch
NYS Office of the State Comptroller
59 Maiden Lane, 21st Floor
New York, New York 10038

Molly Murphy
DSS First Deputy
Commissioner

Santia Gharley
Chief Program
Accountability Officer

Re: 90 Day Corrective Action Plan Update to
the Audit of Oversight of Homeless Shelter
Food Services - (2017-S-53)

Maria Ciniglio
Deputy Commissioner

Dear Mr. Lynch:

150 Greenwich Street
New York, NY 10007

929 221 7126

In accordance with a request from your office dated October 29, 2018, we are providing an update regarding the status of the agency's implementation of the recommendations contained in the Audit Report of the New York City Department of Homeless Services' Oversight of Certified Homeless Shelter Food Services (2017-S-53).

It is our mission to serve New York City's most vulnerable population in the most compassionate, efficient and effective manner, while adhering to all applicable rules, regulations and laws by which we are bound.

We are confident that our progress demonstrates the agency's commitment to continually improving our operations. Should you have any questions, please contact Sonia Lamhari, Director of the DSS Bureau of Audit Coordination at 929-221-5724.

Sincerely,



Maria Ciniglio

Enclosures

**NYC DEPARTMENT OF SOCIAL SERVICES
OFFICE OF AUDIT SERVICES
CORRECTIVE ACTION PLAN (UPDATE)**

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	<p>USDA developed and published “healthy” meal patterns to carry out the dietary guidelines recommendations. These meal plans do not include any item descriptions or food labels.</p> <p>An estimated nutrient analysis can be created without brand names using generic food items in the USDA food database. All of the recipes from the USDA website use generic food items and include estimated nutrition information. The US Department of Health and Human Services National Heart, Lung and Blood Institute created and published a traditional American cuisine menu to show 1600 kcal /day using the Food Exchange List and estimates sodium content. The DHS nutritionist uses similar methods. The exchange list was provided to the audit team. https://www.nhlbi.nih.gov/health/educational/lose_wt/eat/menus_tac_1600.htm.</p> <p>USDA publishes standard recipes for federal, state, and city programs to use on the What’s Cooking USDA Mixing Bowl website. The recipes do not include brand names and provide an estimated nutrient analysis.</p> <p>DHS disagrees with the audit team’s statements regarding lack of assurance the meals sampled met State and City food standards and their disagreement with the methodology used to evaluate menus. The methodology used by the DHS nutritionist is standard and scientifically based. NY State Department of Health website adopted NYC Food Standards</p>	
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	<p>for hospitals but does not publish nutrition guidelines for other populations. NYC food standards are monitored by self-reports and random checks. This is an acceptable method outlined on the reporting template. The information provided may not have been sufficient for the audit team, which is not comprised of nutrition professionals, but is sufficient for federal nutrition agencies and for the DHS nutritionist who is trained in developing menus and estimating nutrient values.</p>			
<p>Recommendation 11: Ensure purchased food complies with the Food Standards.</p>	<p>DHS agrees with this recommendation. The DHS Nutritionist will provide education and guidance to shelter staff on the NYC Food Standards. Shelter staff will submit an order guide when cycle meals are developed. Self-reported food standards monitoring checklists are an acceptable reporting method for the food metric report.</p>	<p>DHS Office of the Medical Director</p>	<ol style="list-style-type: none"> 1. Educate shelter staff and culinary staff on NYC food standards 2. Create cycle menus and order guides with acceptable products. 3. Shelter staff will review inventory and complete the self-report annually. 4. The DHS Nutritionist will visit 10 locations per year to verify self-reports. 	<p align="center">July 2019</p>

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Auditor's Recommendations	Agency Response	Responsible Unit	Agency Corrective Action	Target Date
<p>Recommendation 5:</p> <p>Finalize and implement formalized shelter food inspection policies and procedures and conduct regular inspections in accordance with agency policy.</p>	<p>DHS agrees with this recommendation.</p> <p>Inspection Policy DHS-PB-2018-011 has been issued with an effective date of June 29, 2018.</p> <p>Inspections of all shelter sites are to be conducted two times per year: Once between January and June and once between July and December (generally 6 months apart). Follow-up inspections may be performed to confirm remediation of any noted issues.</p>	<p>DHS Facilities & Logistics</p>	<p>Completed</p> <p>Conduct regular inspections</p>	<p>June 2018</p> <p>Complete and Ongoing</p>
<p>Recommendation 6:</p> <p>Collaborate with OTDA and DOHMH to share inspection results.</p>	<p>DHS agrees with this recommendation.</p> <p>The Agency conducts RSRIs (Routine Site Review Inspections) semiannually at each shelter. The RSRI serves as DHS' record of inspection for assessing shelter conditions, including food service and sanitary standards. As of July 2018, DHS committed to submitting completed RSRIs on a monthly basis to OTDA. Additionally, DHS continues to strengthen its relationship with DOHMH to establish a process for the sharing of results from DOHMH's annual inspections at shelters that maintain a DOHMH-issued food service establishment permit.</p>	<p>DSS ORCA and DHS Facilities & Logistics</p>	<p>Monthly submissions of completed RSRIs to OTDA</p>	<p>August 2018</p> <p>3/14/2019 Update Complete and Ongoing</p>
<p>Recommendation 7:</p>	<p>DHS partially agrees with this recommendation.</p>	<p>DHS Office of the Medical Director</p>	<p>Completed</p>	

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Ensure that food service workers remain current with TB testing requirements.

Current OTDA regulations require food service workers in adult shelters be tested for TB every 24 months. DHS Facilities and Logistics have already taken steps to address this recommendation. The review of TB test results has been added to the revised RSRI tool.

The DHS Office of the Medical Director disagrees with the OTDA regulation regarding TB testing specifically for food handlers. TB testing of food handlers is not required by the NYS DOH or by the NYC DOHMH. DHS will work with OTDA to revise their regulations and implement evidence-based guidelines for staff TB testing. In addition to working with OTDA, the DHS Medical Office is working with the NYC Department of Health and Mental Hygiene to develop TB testing and monitoring procedures.

The OSC audit team made reference to an increase in Tuberculosis, citing DOHMH's Bureau of Tuberculosis Control's 2018 reports and outbreaks of TB in the news. There have not been recent notable outbreaks of Tuberculosis in NYC. This reference is not relevant for the recommendation to "ensure food service workers remain current with TB testing." Tuberculosis is not transmitted through food sources or by serving meals. In DHS facilities, only a few cases of Tuberculosis have been reported. In the DHS shelter system, the number of TB cases reported was:
2015: 6
2016: 3
2017: 6

Collaborate with OTDA to revise their procedure and with DOHMH to develop TB testing and monitoring procedures for DHS.

**Completed
January 2018**

October 2018

**3/14/2019 Update
July 2019**

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<p>Recommendation 8: Implement controls over the inspection report process, including requiring shelter director signatures and inspector/supervisor reviews and signatures.</p>	<p>However, DHS is developing TB testing and management guidelines for its staff and clients, based on current industry standards and epidemiology, and not related to food services. DHS agrees with this recommendation. Routine Site Review Inspection (RSRI) reports are submitted by staff and then generated. The RSRI report is reviewed by a Supervisor and signed. Then it is submitted via email and regular mail to the Shelter Director, Program Administrator and Assistant Commissioner. The provider responds to the RSRI CAP via email or mail as defined in the inspection procedure.</p>	<p>DHS Facilities & Logistics</p>	<p>Implement internal controls over the inspection report process to include requiring the shelter director signatures and inspector /supervisory review and signoff.</p>	<p>Completed January 2018</p>
<p>Recommendation 9: Provide formal written guidelines to the shelters to ensure consistency.</p>	<p>DHS agrees with this recommendation. Inspection Policy DHS-PB-2018-011 has been issued with an effective date of June 29, 2018 The DHS Office of the Medical Director has already drafted numerous written nutrition and meal service guidelines for the shelter staff. Twenty-eight (28) food and nutrition guidelines and additional quality monitoring tools are in the final stages of review at DHS. A TB testing and control policy is under development.</p>	<p>DHS Facilities & Logistics DHS Office of the Medical Director</p>	<p>Finalize inspection policy to include a food inspection portion. Finalize Policy on Nutrition and meal service guidelines. Finalize TB testing and control policy.</p>	<p>Completed June 2018 July 2019 January 2019 3/14/2019 Update</p>

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<p>Recommendation 10:</p> <p>Require shelter providers and caterers to submit menus and other supporting documentation that clearly denotes nutritional information for all individual food items served, including nutritional fact labels, recipes, and food brand names in order to properly verify the nutritional content of meals.</p>	<p>DHS partially agrees with this recommendation.</p> <p>The shelters will be required to submit items or brands to verify the item meets the purchasing standards not to assess an overall healthy, balanced diet.</p> <p>The shelters will be required to submit recipes and include serving sizes to ensure a more exact nutrient analysis.</p> <p>DHS agrees having the brand names and nutrient content will create a more precise nutrient analysis and the sodium content of branded food is needed to evaluate compliance with NYC food standards sodium restriction. However, sodium content is only one portion of the Dietary Guidelines recommendations for healthy, nutritious diets and averages can be used as long as low sodium items are purchased as should be done pursuant to purchasing guidelines.</p> <p>The 2015 Dietary Guidelines were created for professionals to help individuals consume a healthy, nutritionally adequate diet. The current version focuses on eating patterns and provides overarching guidelines to encourage healthy eating patterns. A healthy eating plan includes fruits, vegetables, protein, dairy, grains, and oils while limiting saturated fat and trans-fat, added sugar, and sodium. These nutrients are also limited in the NYC Food Standards.</p>	<p>DHS Office of the Medical Director</p>	<p>Require shelter providers submit item nutritional information or brand names to verify that food items meet purchasing standards.</p>	<p>July 2019</p>
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