



SNP Administrative Review Findings
Program Year 2017

Lanikai Elementary PCS (1436-2)

Lanikai Elementary PCS (1436-2)
140 Alala Road
Kailua, HI 96734-3125

Food Service Contact
Registrar
(808) 266-7844
FSMC: One Love Cafe

Executive Contact
School Director
(808) 266-7844

No. of Sites / Reviewed: 1 / 1
Month of Review: December 2016

Certification and Benefit Issuance - Lanikai Elementary PCS (1436-2)

129. Household notification consistent with Off-site Assessment responses?

Finding 9020: Household notification of eligibility inconsistent with Off-Site Assessment Tool response.

Issue: The SFA did not use the HCNP template to notify households of the approval/denial of benefits. The SFA's letter does not contain all of the required information such as the right to appeal and instructions on how to appeal.

Corrective Action:

Corrective Action Needed:

Assure HCNP that the SFA will use the HCNP templates immediately. The template is available at:
http://hcnp.hawaii.gov/overview/nslp/

131. Applications denied incorrectly?

Finding 9000: Certification and Benefit Issuance \*Repeat Finding

Issue: There were issues with the processing of applications:

- The income was incorrectly calculated when more than one income frequency was listed on the application. The income needs to be converted to an annual income but the SFA converted all income to a monthly income. This was found on two reduced price applications and three denied applications. This was an issue in the last Administrative Review conducted in SY 14-15 and is a repeat violation.
• The number of household members was incorrect on one application as counted by school staff.
• One denied application was calculated incorrectly.
• One denied application was missing the social security number. This was an incomplete application that should not have been processed until it was complete.

Corrective Action:

Corrective Action Needed:

1. Assure HCNP that both the determining and confirming officials will attend the upcoming NSLP training in June which will include the processing of free and reduced price applications.
2. The SFA will be required to conduct an independent review of the applications for SY 17-18. This requires the confirming official to review all applications before the household is notified of their child's eligibility status. A report is required to be completed and submitted to HCNP.

137. Eligibility determination correctly transferred to POS Benefits Issuance document?

Finding 9029: The eligibility determination benefit category is not accurately transferred to the benefit issuance document.

Issue: The parent of one student who was directly certified declined the benefit but was listed in the POS system as free.

Corrective Action:

Corrective Action Needed:

1. Contact the family and ask if they want to be reduced price or paid.
2. Change the status in the POS system. Submit documentation from the POS system to show the status was changed.



Verification - Lanikai Elementary PCS (1436-2)

209. Review of verified applications – properly selected, replaced applications correctly, verified correctly?

**Finding 9000: Verification**

Issue: There following were issues with the SFA's verification process:

- A confirmation review was not completed on the application selected for verification. This is a requirement in the verification process.
- The SFA's verification notification letter is an old letter from another state. The nondiscrimination statement is incorrect.
- There is no copy of the letter sent to the household with the results of the verification.
- There is no record of the verbal follow-up that was done with the household.
- The documents submitted for documentation indicate the income was biweekly, but the application has income listed as monthly. The submitted documents only cover 3 weeks of employment. The household should be asked if this was a normal month. If not, additional documentation should be requested.

**Corrective Action:**

Corrective Action Needed:

1. Provide HCNP with the SFA's written procedure on the verification process. The procedure must include how the SFA will correct all issues listed above.
2. Assure HCNP that beginning with SY 17-18, the SFA will follow the verification process provided to HCNP.

**Technical Assistance:**

Technical assistance was provided on maintaining documentation of all follow-ups that are done.

All of the required procedures for verification were covered in HCNP's annual training. The training PowerPoint and HCNP letter templates are available on the Hawaii Child Nutrition Programs website (<http://hcnp.hawaii.gov/>) and verification is explained in the Eligibility Manual for school meals.

General Program Compliance - Lanikai Elementary PCS (1436-2)

810. Non-discrimination on appropriate Program materials?

**Finding 9000: Civil Rights \*Repeat Finding**

Issue: Program materials do not contain the correct nondiscrimination statement:

- Lunch order letter
- Menu (corrected on 1/20/17)
- Household notification letter of approval/denial
- Verification letter

Not having the correct nondiscrimination statement on the lunch order letter and household notification letter was an issue in the last Administrative Review conducted in SY 14-15 and is a repeat violation.

**Corrective Action:**

Corrective Action Needed:

1. Correct the nondiscrimination on the documents listed above. Use the HCNP templates for the household notification letters. Templates are available at: <http://hcnp.hawaii.gov/overview/nsip/>
2. Provide a copy of the corrected documents with the most current nondiscrimination statement.

1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?

**Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.**

Issue: The LWP does not contain information on school meal standards and guidelines and does not contain the SFA's plan on how the implementation of the LWP will be measured. :



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**Corrective Action:**

Corrective Action Needed:

1. Update the LWP to include information on school meal standards and guidelines and the SFA's plan on how the implementation of the LWP will be measured.
2. Submit to HCNP a copy of the updated LWP.

Reminder: by June 30, 2017, the LWP needs to be in full compliance with all of the final rule requirements (handed out at HCNP training). The Summary of the Final Rule is available at:

[https://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](https://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)

**Technical Assistance:**

Technical assistance provided to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool.

1214. Validate OFS #1202 - Were hiring requirements met when hiring new Director?

**Finding 9000: Area: Professional Standards**

Issue:

- The SFA hired a new food service director after July 1, 2015. Adequate information was not provided to HCNP to determine during the on-site review if the hiring standards were met for the new food service director.
- The new food service director has not completed the hiring standards food safety training requirement of at least 8 hours.
- Two employees have not met the training requirement of 6 hours for SY 16-17.

During the on-site review, a copy of the USDA flyer, "Professional Standards for All School Nutrition Program Employees" was provided to the SFA. This flyer lists the hiring standards and the training standards that must be met.

**Corrective Action:**

Corrective Action Needed:

1. Review the USDA flyer, "Professional Standards for All School Nutrition Program Employees".
2. Submit to HCNP a copy of the resume for the new food service director. Explain why the SFA thinks the hiring standards were met.
3. The new food service director must complete the food safety training requirement of at least 8 hours. A 12 hour food safety course called "Serving It Safe" is available at: <http://theicn.org/Templates/TemplateDefault.aspx?qs=cEIEPTIzNw==>
4. Submit training documentation to demonstrate the food safety training requirement has been completed.
5. Submit a plan on how each employee will meet the required training hours by the end of SY 16-17.

1400. Food safety plan – contain required elements, copy available at each school?

**Finding 9000: Food Safety (Vendor)**

Issue:

- The process approach charts in the vendor's food safety plan are not completed in its entirety.
- The vendor stated the food safety plan is reviewed annually but this is not being documented. The SOPs were dated on 7/1/12 and 7/1/16.
- The vendor stated the staff has been trained but there is no documentation of the food safety training.

**Corrective Action:**

Corrective Action Needed:

1. Complete the process approach charts in the food safety plan. Submit a copy of the completed process approach charts.
2. Assure HCNP that the food safety plan will be reviewed and documented annually.
3. Assure HCNP that appropriate staff will be trained annually in food safety and documentation will be maintained.

**Technical Assistance:**

Technical assistance was provided on the differences between the processes so the charts can be completed. It was also explained to the vendor that documentation must be maintained when the food safety plan is reviewed annually.



Technical assistance was provided on maintaining documentation of food safety training for all staff members.

1400. Food safety plan – contain required elements, copy available at each school?

**Finding 9142: The written food safety plan does not contain all the required elements. \*Repeat Finding**

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements:

Issue:

1. The SFA's food safety plan is incomplete; it does not contain any Standard Operating Procedures (SOPs). This was an issue in the last Administrative Review conducted in SY 14-15 and is a repeat violation.
2. The process approach charts are not completed in its entirety.

**Corrective Action:**

Corrective Action Needed:

1. Complete the food safety plan (process approach charts and SOPs). SOPs are available on HCNP's website at: <http://hcnp.hawaii.gov/overview/nslp/>
2. Review, sign, and date the SOPs.
3. Submit a copy of the completed process approach charts and the signed and dated SOPs that have been included in the SFA's food safety plan.
4. Assure HCNP that the food safety plan has been completed, will be reviewed annually and appropriate staff will be trained and documented annually.

**Technical Assistance:**

Technical assistance was provided on the differences between the processes so the charts can be completed.

1500. Reports submitted to State agency as required?

**Finding 9151: SFA does not submit reports as required to the State agency.**

The SFA does not submit reports to the State agency according to reporting and recordkeeping requirements described in 7CFR 210.20.

Issue: Reports are not submitted to HCNP by the specified deadlines.

- The Paid Lunch Equity (PLE) report was not submitted to HCNP by the due date (September 2016). (The PLE report was submitted during the on-site review on 1/24/17)
- The NSLP renewal application was not submitted until August 2016. This was due in June, 2016.

**Corrective Action:**

Corrective Action Needed:

Provide HCNP with a plan on how the SFA will submit reports as required by HCNP by the specified deadlines.

1501. Records retained for 3 years?

**Finding 9152: SFA not retaining Program records for a minimum of 3 years.**

Issue: Records are not retained for three years after the final claim for reimbursement for the fiscal year or until the resolution of any audits. Delivery receipts are not available prior to December 2016. Due to staff turnover, it is unclear what records have been kept.

**Corrective Action:**

Corrective Action Needed:

Records must be maintained for three years plus the current year or until the resolution of any audits. Describe how the SFA will maintain all documentation to meet the recordkeeping requirement.



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Lanikai Elementary (320-PCS)

140 Alala Road  
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Food Service Contact

Registrar  
(808) 266-7844

Month of Review: December 2016

Date of Onsite Review: January 24, 2017

Meal Counting & Claiming - Lanikai Elementary (320-PCS)

317. DOR meal observation – overt identification, F/R eligible students treated differently?

**Finding 9062: Overt identification of students receiving F/R benefits.**

Issue: Students are being allowed to look at the POS computer screen. A sound and notice appears on the computer screen when a student has insufficient funds in their account and shows the account balance.

**Corrective Action:**

Corrective Action Needed:

1. Position the meal clerk and the POS system in a way so that the students cannot see the computer screen to prevent students from looking at any confidential information.
2. Describe to HCNP how and when this issue was corrected.

Meal Components & Quantities - Lanikai Elementary (320-PCS)

410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Issue: Transport Daily Record does not list all food items when compared to the production records:

- 12/6/16: Bun was not listed on the Transport Daily Record but was listed on the production record.
- 12/8/16: Muffin was not listed on the Transport Daily Record but was listed on the production record.

**Corrective Action:**

Corrective Action Needed:

1. Describe to HCNP how the issue above will be corrected.
2. Submit one week of completed production records and corresponding completed transport records (in February) to demonstrate the issue has been corrected.

Suggestion: have the vendor type the left side of the Transport Daily Record to match the information on the production record instead of handwriting it each day.

**Technical Assistance:**

Technical assistance was provided to the SFA that the Transport Daily Records must have all of the food items listed. It is the SFA's responsibility to make sure that they received all of the items that are in the meal. The Transport Daily Record serves as proof of the receipt of reimbursable meals.

General Program Compliance - Lanikai Elementary (320-PCS)

1406. SFA written food safety plan implemented?

**Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.**

Proper HACCP principles not observed: [evidence of pests]

Issue: During lunch service, it was observed that birds were entering the cafeteria. This was also cited on the school's most



recent food safety inspection by the Department of Health.

**Corrective Action:**

Corrective Action Needed:

1. Determine a way to minimize the number of birds that enter the cafeteria. A suggestion is to close the doors that are not in use during meal service.
2. Describe to HCNP what has been done to minimize birds from entering the cafeteria.

1407. *Temperature logs available?*

**Finding 9149: Temperature logs unavailable for review.**

Issue:

- Temperature logs are not being maintained for the freezer.
- Concentration logs for the sanitizer in the compartment sink are not being maintained.

Provided SFA with the HCNP temperature log template to share with the vendor.

**Corrective Action:**

Corrective Action Needed:

1. Document temperatures for all refrigerators and freezers daily.
2. Provide one week's completed equipment temperature log.
3. Document the sanitizer concentration for the compartment sink daily.
4. Provide one week's completed sanitizer concentration log.