123. On-site observation validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions?

Finding 9000: Certification and Benefit Issuance - SFA states it does not extend Direct Certification status to other household students
The SFA states it does not extend Direct Certification status to other household students when it is known that a student in the same household is Directly Certified. They require an application from the household. Per the Eligibility Manual for School Meals, SY 2016-17, page 14, “a child or other household member’s receipt of benefits from an Assistance Program automatically extends eligibility for free benefits to all children who are members of the household.”

Corrective Action:
1. Train the appropriate employees on the correct procedure for extending meal benefits to other students in households where it is known that one student is directly certified or categorically eligible.
2. Submit to HCNP documentation of the training including the agenda, content and sign in records.
3. Assure HCNP that the determining official will attend the mandatory training conducted by HCNP when meal applications are on the agenda.

Technical Assistance:
TA was provided to the SFA that the USDA regulation states that free meal benefits are to be extended to all students in a household in which one household member is receiving SNAP or TANF benefits. An application for the other students is not required.

126. Certification Benefits/Issuance Review Method, applications correctly approved?

Finding 9000: Certification and Benefit Issuance - One application was missing the Social Security number.
One application was missing the Social Security number. This is an incomplete application and cannot be processed until the number is provided.

Corrective Action:
1. Call the household and request the last 4 digits of the Social Security number.
2. Document the phone call. If a school employee records the information on the meal application, it must be initialed and dated by the employee.
3. Submit to HCNP a copy of the completed application.

126. Certification Benefits/Issuance Review Method, applications correctly approved?

Finding 9017: The application approval process is not implemented correctly.
Based on the selected students, eligibility determination errors were found, as listed on the SFA-1.
1. Two applications were miscategorized. The students are receiving the incorrect benefit; the students are classified as free and should be reduced.
2. Two students were listed as qualifying for free meals but there was no documentation supporting this. The correction was made on 11/17/16 for one of the students.
Corrective Action:
1. Each household must be given 10 calendar days notice of a decrease in meal benefits. Immediately send a letter to each household notifying them of the benefit change. In the letter notify the household of the date of the change.
2. On the date of the change in benefits, make the change in the electronic POS system.
3. Submit to HCNP a copy of the letter sent to the household and a copy of the POS showing the change.

Finding 9019: Incorrect conversion factors used when processing applications.
The incorrect conversion factors were used when processing the applications resulting in the wrong benefit determinations being made. The determining official did not attend the training on processing meal applications for SY 16-17.

Corrective Action:
Assure HCNP that the determining official will attend the mandatory training conducted by HCNP when meal applications are on the agenda.

Finding 9000: Certification and Benefit Issuance - The benefit issuance document was not updated in a timely manner.
The benefit issuance document was not updated in a timely manner. A transfer student with a status that ended in SY 14-15 had not been changed in the POS. This was corrected during the review.

Corrective Action:
1. The status was corrected and changed in the POS during the review.
2. Assure HCNP that the POS will be reviewed and updated in a timely manner and that the benefit issuance for each student will be checked against the supporting documentation.

Verification - Voyager A PCS (1422-2)

Finding 9000: Verification - Applications misplaced
The three applications that were selected for verification appear to have been lost during the Administrative Review.

Corrective Action:
1. Notify the three selected households that the applications need to be resubmitted.
2. Submit to HCNP copies of the three applications.
3. Complete the verification for one error prone application that was selected for verification.
4. Submit to HCNP copies of the verification documents for the one verified application. Include documentation of the follow up and the letter sent when the verification was completed.

Finding 9000: Verification - The verifying official did not attend the training on verification for SY 16-17.
Issue: The verifying official did not attend the training on verification for SY 16-17. The following errors were found concerning verification:
1. Verification was not completed by November 15, 2016.
2. The SFA should have selected 1 application to verify, instead 3 were selected.
3. Error prone applications are supposed to be selected for verification. Of the 3 selected, only one was error prone.
4. Follow up contact was not made or recorded for the applications selected to be verified.
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5. Only one household had responded to the verification but the household did not provide documentation of all the income reported on the application.

Corrective Action:
1. Assure HCNP that the verifying official will attend the mandatory training conducted by HCNP when verification is on the agenda.
2. Train the verification official on the procedure for verification using the Verification powerpoint for SY 2016-17 found on the Hawaii Child Nutrition Programs website: http://hcnp.hawaii.gov/overview/nslp/
3. Submit to HCNP a copy of the training records on verification for the verification official.

Resource Management - Voyager A PCS (1422-2)

705. Procedures to ensure that only allowable costs were charged to the nonprofit school food service account?

Finding 9000: Resource Management
A bad debt was charged to the nonprofit food service account. This is an unallowable expense that must be removed from the account.

Corrective Action:
1. Remove the bad debt from the nonprofit food service account.
3. Submit to Shaynee Moreno, HCNP Accountant, a copy of the accounting record showing this correction has been made.

General Program Compliance - Voyager A PCS (1422-2)

808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?

Finding 9000: Civil Rights - The Civil Rights manual at the SFA had not been updated
The Civil Rights manual at the SFA had not been updated and contained outdated materials and forms.

Corrective Action:
The Civil Rights manual was updated during the Administrative Review.

808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?

Finding 9000: Civil Rights - Training
The SFA reported that the Civil Rights training was conducted on October 25, 2016, but no documentation was submitted.

Corrective Action:
Corrective Action Needed:
Submit to HCNP copies of the training records documenting the Civil Rights training.

810. Non-discrimination on appropriate Program materials?

Finding 9000: Civil Rights - The nondiscrimination statement on the posted menu is incorrect.
The nondiscrimination statement on the posted menu is incorrect.

Corrective Action:
Correct the statement on the posted menu to “This institution is an equal opportunity provider.
2. Submit to HCNP a copy of the December and January menus with the correct nondiscrimination statement.
1400. Food safety plan – contain required elements, copy available at each school?

Finding 9000: Food Safety-Vendor does not have a food safety plan in place
The vendor does not have a food safety plan in place. The USDA regulation is that the SFA must develop a written food safety program for each of its food preparation and service facilities.

Corrective Action:
1. A written food safety plan must be developed and implemented by or for the vendor. A template for a food safety plan can be found on the Hawaii Child Nutrition Programs website: http://hcnp.hawaii.gov/overview/nslp/
2. Submit to HCNP a copy of the completed food safety plan that has been signed and implemented.
3. Submit to HCNP copies of training records which include the agenda and sign in logs for all vendor employees.
4. Assure HCNP that the Food Safety Plan will be reviewed and trained on annually with appropriate staff and that the training will be documented.

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.
The SFA does not submit reports to the State Agency by the due dates. (Examples: the NSLP renewal application was due May 31, 2016 but the SFA did not complete it until July 22, 2016. For SY 2015-16, the verification summary report was due December 18, 2015, but the SFA did not complete the report until January 5, 2016.)

Corrective Action:
Submit to HCNP the SFA’s plan to meet HCNP deadlines for the NSLP/SBP.

Voyager A (541-PCS)
2428 Wilder Avenue
Honolulu, HI 96822

Food Service Contact
School Food Service Manager
(808) 521-9770

Month of Review: October 2016

Meal Components & Quantities - Voyager A (541-PCS)

401. DOR - meals selected by students contain all required components/quantities? Enter data.

Finding 9000: Meal Components and Quantities - The vendor cannot provide standardized recipes
The vendor cannot provide standardized recipes. Standardized recipes are needed as proof that sufficient quantities of the meal components are being provided to meet meal pattern requirements and dietary specifications.

Corrective Action:
Provide HCNP with copies of standardized recipes for prepared items on the revised menu.

402. DOR - quantities served meet daily meal pattern requirements for age/grade groups? Enter data

Finding 9052: Day of Review portion sizes insufficient.
As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain
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insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review: The lunch menu for the day of review was short the grain requirement.

Corrective Action:
See the Corrective Action for the Month of Review

403. DOR - two varieties of milk available, allowable substitutions? Enter data.

Finding 9053: Milk variety not offered throughout serving period on Day of Review.
As observed on the Day of Review, at least two required milk varieties were not available throughout the serving period on all meal service lines. On the day of review during all three lunch meal service periods, the chocolate milk ran out and only one milk type was available. The requirement is for two required varieties of milk to be available throughout the serving period.

Corrective Action:
Describe to HCNP what procedure the SFA will use to insure that 2 milk types are available during the entirety of all meal services.

Technical Assistance:
The school was advised and given the opportunity to add another type of milk to meal service line(s) when it was observed that only one type of milk was being offered.

406. DOR - meal service structured to meet specific meal pattern requirements for multiple menus, multiple age/grade groups served?

Finding 9000: Meal Components and Quantities - The SFA is being charged two separate prices for a “lunch mini” and a “lunch”.
The SFA is being charged two separate prices for a “lunch mini” and a “lunch”. The SFA serves K-8 and could have one lunch with the same portions for grades K-8. The menu, production records and delivery receipts do not show any distinction between a “lunch mini” and a “lunch”. The only observation made by the reviewers was that on the day of review, the hamburger patty was bigger for grades 6-8. It appears the SFA is paying two prices for the same meal.

Corrective Action:
1. The SFA must determine whether it wants a K-8 menu or separate menus for K-5 and 6-8.
2. Notify HCNP of the decision regarding the menus.
3. Once this determination is made, the lunch menus, production records and delivery receipts must be written to match what the SFA requests.
4. Submit to HCNP copies of the revised menus, production records and delivery receipts that show compliance with the SFA request.

408. Performance Based Reimbursement turned off due DOR findings?

Finding 9000: Meal Components and Quantities - excessive in food quantity, fat and sodium.
Most breakfast menus are rice, eggs and a high sodium meat item. This is excessive in food quantity, fat and sodium.

Corrective Action:
The breakfast menus must be revised to provide meals that are lower in calories, fat and sodium.
1. Submit to HCNP a copy of the revised cycle menus for breakfast using the HCNP menu planning template that shows the portion sizes of each meal component.
2. Submit to HCNP the completed USDA menu certification worksheets for each menu week showing how each week meets the meal pattern requirements. (Completion of the form was covered in the September 2016 HCNP training)
3. Submit to HCNP two weeks of completed production records and delivery receipts that match the revised breakfast menu cycle.
410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

Finding 9000: Meal Components - The vendor is serving high fat, high sodium, high carbohydrate food items
The vendor is serving high fat, high sodium, high carbohydrate food items. For example: French Fries are being prepared in a deep fryer, regular sodium soy sauce is being used in cooking, and the canned pineapple is in heavy syrup.

Corrective Action:
1. Assure HCNP that only fresh fruit or fruit canned in juice or light syrup will be served.
2. When the menu is revised, it must be clear that lower fat, lower sodium foods, seasonings and condiments are being used. These items can be listed on the menu and food labels provided as proof of this.

Finding 9000: Meal Components and Quantities - The whole grain rich requirement is not being met
The whole grain rich requirement is not being met. The requirement is for all grain products to be whole grain rich (at least 50% of the product is whole grain and the other 50% enriched). The SFA and vendor could not provide documentation on the grain products, excluding the rice, that the products were whole grain rich. Reference: http://www.fns.usda.gov/tn/whole-grain-resource

Corrective Action:
1. Provide documentation (product labels or product formulation statements from the manufacturer) for grain products showing the items are whole grain rich.
2. Submit copies of the documentation to HCNP.

Finding 9000: Meal Components and Quantities-Month of Review - The available delivery receipts for breakfast and lunch for the month of review had the following missing or short portions:
Issue: The available delivery receipts for breakfast and lunch for the month of review had the following missing or short portions:
Breakfast
1. 10/3 missing portions for the fruit, egg and sausage
2. 10/18 short ¼ cup fruit portion (3/4 cup only listed)
3. 10/20 short ¼ cup fruit portion (3/4 cup only listed)
4. 10/17 no fruit on delivery receipt (nonreimbursable meal)
Lunch
1. 10/4 short ¼ cup vegetable (1 c tossed salad listed)
2. 10/5 short ¼ cup vegetable (3/4 c salad listed), no fruit portion listed
3. 10/6 short ½ cup vegetable (1 c salad listed)
4. 10/19 short ¼ cup vegetable (3/4 c salad listed)
5. 10/20 mixed vegetable portion not listed
6. 10/21 short grain portion
7. 10/25 short 3/8 cup vegetable (3/4 c salad listed)
8. 10/28 short 3/8 cup vegetable (3/4 c salad listed), crediting of grain an meat not listed
9. 10/17 broccoli portion not listed.
The way the menu and delivery receipts are written, there is no way to determine if the vegetable requirements are being met.

Corrective Action:
1. Submit to HCNP a copy of the revised cycle menus for lunch using the HCNP menu planning template that shows the portion sizes of each meal component and each grade group being planned for.
2. Submit to HCNP the completed USDA menu certification worksheets for each menu week showing how each week meets
the meal pattern requirements. (Completion of the form was covered in the September 2016 HCNP training) 
3. Submit to HCNP two weeks of completed production records and delivery receipts that match the revised lunch menu cycle.

General Program Compliance - Voyager A (541-PCS)

1403. Food safety plan - written, copy available?

Finding 9000: Food Safety-SFA
The SFA Food Safety Plan is only partially completed.

Corrective Action:
1. Complete the Food Safety Plan for the SFA. Sign and implement it.
2. Train appropriate employees on the Food Safety Plan.
3. Submit to HCNP a copy of the signed Food Safety Plan.
4. Submit to HCNP copies of the signed training records for appropriate employees.

1405. Most recent Food safety inspection posted, visible to public?

Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.
A copy of the most recent food safety inspection was not posted in a publicly visible location.

Corrective Action:
A copy of the most recent food safety inspection was posted by the green placard on 11/18/16.

1407. Temperature logs available?

Finding 9000: Food Safety - time/temp for production records and delivery receipts
The time and temperatures being recorded on the production records and delivery receipts are the same every day (the temperatures are always the same and they are all being taken at the same time). This could be interpreted as fabricated information.

Corrective Action:
1. Instruct the vendor that the times and temperatures recorded on the production record and delivery receipt must be the actual time and the actual temperature.
2. Submit to HCNP copies of 2 weeks of correctly completed production records and delivery receipts.

1407. Temperature logs available?

Finding 9149: Temperature logs unavailable for review.
FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs unavailable for:
The SFA has a refrigerator but does not keep a temperature log for it.

Corrective Action:
1. Start keeping a temperature log for the refrigerator. The log should include the date, time of day, temperature and initials of person recording the temperature.
2. Submit to HCNP a copy of 2 weeks of the completed temperature log.
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1408. Storage violations observed, on-site, off-site?

**Finding 9000: SFA oversight of vendor**
Based upon the number of food safety and meal component violations, it appears the SFA has not provided adequate oversight of the meal contract.

**Corrective Action:**
Describe to HCNP what Voyager PCS will do to oversee the meal contract and to assure compliance with the National School Lunch/School Breakfast Program requirements.

1408. Storage violations observed, on-site, off-site?

**Finding 9150: Storage violations were observed.**
The following are food safety violations observed on November 14, 2016 by HCNP reviewers:
1. Food equipment, utensils and food contact surfaces are not properly washed, rinsed, and sanitized before every use.
2. Proper procedures are not followed to prevent cross contamination.
3. Food is not being stored 6 inches or more from the floor in all storage areas.
4. Temperature logs are not being completed for all prepared food items. (The same temperature is being listed at the same time every day for every food item.)
5. Items are not dated with the received date.
6. All food items are not properly wrapped and/or labeled.
7. Thermometers are not in all food storage areas.
8. Proper sanitizing solution was not available for use on food surface areas.
9. Soap and cleaning supplies are stored in the same area as food and beverages.
10. Cardboard boxes were being used as mats on the floor instead of nonslip mats.
11. Food is left uncovered in the preparation area.
12. Gloves are being used improperly: the vendor kept the same pair of gloves on during the AR visit, handled many items and touched many surfaces without changing the gloves and/or washing his hands.
13. There is no log for the sanitizer in the dish/pot washing and sanitizing sink.
14. Personal items (backpacks) are being stored in the food preparation area.
15. The food storage is very disorganized and items are not dated so it is hard to determine if first in/first out is practiced.

**Corrective Action:**
1. Submit to HCNP the description on how each of the above violations has been corrected.
2. State the date each correction was made.
3. Identify which Standard Operating Procedure (SOP) included in the food safety plan addresses the correction and confirm to HCNP that the SOP has been implemented and trained on.