



SNP Administrative Review Findings

Hawaii National Guard Youth Challenge Academy RCCI (1420-6)

Program Year 2017

Hawaii National Guard Youth Challenge Academy RCCI (1420-6) Bldg 1787 Shangrila St Room104 Kapolei, HI 96707-0348

Food Service Contact Admin/Log Coordinator (808) 685-7134 FSMC: Nippon Food Takeout & Catering

Executive Contact Director (808) 685-7126

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

Certification and Benefit Issuance - Hawaii National Guard Youth Challenge Academy RCCI (1420-6)

125. RCCI with no day students – correct eligibility documentation?

Finding 9000: Certification and Benefit Issuance

Issue: The meal counting forms are not being updated when a cadet leaves or is dismissed:

- 1. On 10/7/16, a cadet was marked as having received a reimbursable breakfast and lunch, but the records indicate he was dismissed on 9/8/16.
2. Eight cadets were dismissed but are listed on the meal counting forms: the name is on the checklist, removed and then it reappears.

Corrective Action:

Corrective Action Needed:

- 1. Describe to HCNP what procedure Youth Challenge Academy will follow to keep their meal counting forms updated with only currently enrolled cadets.
2. Provide HCNP with the date this procedure was implemented.

General Program Compliance - Hawaii National Guard Youth Challenge Academy RCCI (1420-6)

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

Finding 9000: Civil Rights

Issue: The Civil Rights manual has outdated forms in it.

Corrective Action Needed:

The Civil Rights manual was updated during the review with new forms.

Corrective Action:

Response/Plan/Action: No further action required.

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

Finding 9000: Wellness policy

Issue: The regulation regarding the Local Wellness Policy requires that it must be available to the public. It is acceptable to post it on the SFA's website, but it needs to be easily accessible. The Local Wellness Policy for this SFA is difficult to locate on the website and is buried in a Frequently Asked Questions section.

Corrective Action:

Corrective Action Needed:

- 1. Move the Local Wellness Policy to a location on the website that is easy to access.
2. Notify HCNP the date this is completed and provide the link to the Local Wellness Policy.



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

Finding 9000: Wellness Policy

Issue: The Wellness Policy has not been updated. There are references to selling food and vending machines in the policy. Since the SFA does not have vending machines and does not sell food on the campus, the policy needs to be corrected.

Corrective Action:

Corrective Action Needed:

1. Update the Wellness Policy to be current with the SFA practice on selling food and vending machines.
2. Notify HCNP the date this has been completed and the revised policy posted on the website.

1213. Validate OFS #1201 - SFA employee count

Finding 9000: Professional Standards/Training

Issue: There is no documentation that additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program are being trained (example: training on Offer Vs Serve and Meal Counting).

Corrective Action:

Corrective Action Needed:

1. Notify HCNP on how training related to the meal program will be documented.
2. Notify HCNP of the date this procedure was implemented.

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

Finding 9000: SFA oversight of vendor

Issue: 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:

Corrective Action Needed:

Describe to HCNP what National Guard Youth Challenge Academy will do to oversee the meal contract and to assure compliance with the National School Lunch/School Breakfast Program requirements.

1501. Records retained for 3 years?

Finding 9000: Resource Management-Fiscal

Issue: The percentages of State and Federal monies transferred into the Nonprofit Food Service Account are not obvious.

Corrective Action:

Corrective Action Needed:

Send to the accountant at HCNP the backup documentation that shows the percentage of State and Federal funds transferred into the Nonprofit Food Service Account. Provide the names of the grants and CFDA numbers used to designate the State and Federal accounts.

1501. Records retained for 3 years?

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



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The SFA is not retaining the appropriate records regarding program management for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. Issue: The delivery receipts for several meals in October 2016 are missing.

Corrective Action:

Corrective Action Needed:

1. Write a procedure for accepting meals. Include the handling of the delivery receipts and assurance that these records will be available and kept for the required amount of time.
2. Submit to HCNP a copy of the procedure.



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Hawaii National Guard Youth Challenge Academy (904-RCC)

Bldg 1787 Shangrila St
Room 104
Kapolei, HI 96707-0348

Food Service Contact

Admin/Log Coordinator
(808) 685-7134

Month of Review: October 2016

Date of Onsite Review: November 15, 2016

Meal Counting & Claiming - Hawaii National Guard Youth Challenge Academy (904-RCC)

318. DOR - accurate meal counts by category at POS? Enter data.

Finding 9066: Inaccurate meal counts by eligibility category at the POS.

As observed on the Day of Review, each type of meal service line does not provide an accurate count by eligibility category at the point of service. Issue: On the day of review, the person recording the meal count was standing at the beginning of the line and there was no one at the end of the line to confirm that a reimbursable meal was served. The application in HCNP Systems states that meals are counted at the end of the line.

Corrective Action:

Corrective Action Needed:

1. Train/retrain all personnel that record the meal counts on the procedure to use when counting meals. Include training on recognizing reimbursable meals and Offer Vs Serve.
2. Provide HCNP with documentation of the training including the agenda and training signature logs.

325. Review Period meal counts by category correctly used in the claim? Enter data.

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The SFA's claim for the school for the Review Period does not match the State agency's validated meal counts by category for the school for the Review Period. [The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.] Issue: The October 2016 SFA meal claim for both breakfast and lunch exceeded the meal counts. The SFA over claimed 26 breakfasts and 24 lunches.

Corrective Action:

Corrective Action Needed:

1. Write a procedure for consolidating the meal claim based on the meal counts. Include in the procedure the method that will be used to confirm the meal count totals and the meal claims are correct. Suggestion: include a second party reviewer.
2. Submit to HCNP a copy of the written procedure.

Meal Components & Quantities - Hawaii National Guard Youth Challenge Academy (904-RCC)

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

Finding 9000: meal components and quantities

Issue: 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>



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Corrective Action:

Corrective Action Needed:

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.

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

Finding 9052: Day of Review portion sizes insufficient. *Repeat Finding

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 insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review: Issue:

1. The delivery receipt for the lunch on the day of review listed the hot dog bun as 1.75 ounces. The daily requirement for the age/grade group 9-12 is 2 ounce equivalents. The meal was short the grain component. This is a repeat finding that insufficient quantity of grain is being served. Fiscal Action will be considered for all repeat findings.
2. The available delivery receipts for the lunches for the month of review had the following missing or short portions:
 - 10/3 the vegetable portions are not listed
 - 10/4 short 1/2 cup of vegetables
 - 10/7 short 3/4 cup vegetables
 - 10/9 short 1/4 cup vegetables
 - 10/15 missing fruit and short 1/4 cup vegetables
 - 10/16 missing fruit
 - 10/17 short 5/8 cup vegetables
 - 10/21 missing vegetables
3. The available delivery receipts for the lunches for the month of review had the following short portions:
 - 10/26 the only fruit was 1 orange (113 count) which is 5/8 cup so this was short on fruit. This is a repeat finding that the daily minimum fruit requirement.
 - 10/29 1/4 cup of rice is listed so this is short on grain
4. Most breakfast menus are rice, eggs and a high sodium meat item. This is excessive in food quantity, fat and sodium.

Corrective Action:

Corrective Action Needed:

1. Submit to HCNP a copy of the revised cycle menus for lunch and 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) <http://www.fns.usda.gov/school-meals/certification-compliance>
3. Submit to HCNP production record templates that match the revised breakfast and lunch menus cycle.

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of grain before the meal service started.

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. Issue: Prior to the start of service on the day of review, two milk types were available, Fat Free Chocolate and Fat Free White milk. During the service, the Chocolate milk ran out. About 40 cadets did not have a choice of milk. Two milk types must be available during the entire meal service. This was not a repeat violation.

Corrective Action:



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Corrective Action Needed:

1. The SFA must determine how much of each type of milk the vendor is to deliver for each meal.
2. The SFA must monitor the meal service to determine if enough of each milk type is being provided and change the order as needed.
3. Describe to HCNP what action the SFA took to assure that 2 milk types are available throughout each meal service.

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.

404. DOR - signage explaining reimbursable meal near/at beginning of service line?

Finding 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.

As observed on the Day of Review, signage explaining what constitutes a reimbursable meal is not identified near or at the beginning of the meal service line(s). Issue: There is no signage explaining what constitutes a reimbursable breakfast or lunch for the students.

Corrective Action:

Corrective Action Needed:

1. Post the monthly menu for breakfast and lunch at or near the beginning of the serving line in the dining area for all students to see.
2. Notify HCNP the date this was completed.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

407. DOR - school comply with planned menu, changes made? Enter data

Finding 9059: For Day of Review, meals offered on meal service line(s) were not consistent with planned menu(s).

As observed on the Day of Review, the planned menu(s) for the Day of the Review did not reflect what was actually offered on the meal service line. Issue: The production records do not consistently match what is on the delivery receipt or what food is actually served. (On the day of review, the production record listed papaya and mixed vegetable but the SFA received apples and tossed salad.) The production records and delivery receipts must match exactly.

Corrective Action:

Corrective Action Needed:

1. The SFA must require that the vendor follow the cycle menu exactly and can only make changes with the permission of the SFA.
2. Assure HCNP that the vendor has been instructed on following the menu and providing delivery receipts with all menu items listed correctly including the portions.
3. Provide the date this instruction was given.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

*409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?
Enter data.*

Finding 9000: Meal Components and quantities / standardized recipes

Issue: 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.



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Corrective Action:

Corrective Action Needed:

1. Provide HCNP with copies of standardized recipes for prepared items on the revised menu.

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

Finding 9000: Meal components and quantities - vendor

Issue: 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:

Corrective Action Needed:

1. Assure HCNP that only 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.

501. *Cafeteria staff trained on OVS?*

Finding 9079: Cafeteria staff has not been adequately trained on requirements and implementation of Offer vs. Serve.

Issue: Offer Vs Serve appears to have been implemented. However, there was no signage and no training records for the staff on Offer Vs Serve.

Corrective Action:

Corrective Action Needed:

1. Train all staff that serve and count meals on Offer Vs Serve. (This was trained on in the June 2016 HCNP training.)
2. Submit to HCNP copies of training records on Offer Vs Serve, including agenda and sign in sheets.
3. Notify HCNP that signage on Offer Vs Serve for breakfast and lunch has been posted at or near the beginning of the serving line.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

General Program Compliance - Hawaii National Guard Youth Challenge Academy (904-RCC)

811. *Justice for All poster displayed in prominent location?*

Finding 9101: Justice For All poster not displayed in prominent location.

The USDA "And Justice for All" poster was not displayed in a prominent location where it is visible to recipients of benefits.

Corrective Action:

Issue: The Justice for All poster was not posted in the dining area on the first day of the review. It was posted on the second day.

Corrective Action Needed:

No further action required.

1403. *Food safety plan - written, copy available?*

Finding 9145: A copy of the written food safety plan was not available at the reviewed school.

Issue: The Food Safety Plan on site at Youth Challenge Academy has not been completed. The template has not been completed and the SOPs have not been signed and dated with an indication of implementation.



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Corrective Action:

Corrective Action Needed:

1. Complete and implement the Food Safety Plan.
2. Notify HCNP of the date this has been completed.
3. Assure HCNP that the Food Safety Plan will be reviewed and trained on annually with appropriate staff and training will be documented.

1404. Food safety inspection dates?

Finding 9146: Less than 2 food safety inspections were done in the current school year and no documentation that 2 inspections have been requested.

The school did not provide two food safety inspection reports for the current school year and no documentation was available to substantiate the SFA has requested two food safety inspections for the current year. Issue: The most recent Food Safety Inspection was conducted on 11/12/15, over a year ago. The SFA last requested an inspection in February 2016. There have been no inspections or requests for SY 16-17.

Corrective Action:

Corrective Action Needed:

1. Submit a request for 2 Food Safety/Sanitation Inspections for SY 16-17 to the Health Department.
2. Submit to HCNP a copy of the request for the inspections.

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.

Issue: A copy of the report for the most recent Food Safety Inspection was not posted in a publicly visible location.

Corrective Action:

Corrective Action Needed:

1. Post a copy of the most recent Food Safety Inspection in a publicly visible location.
2. Notify HCNP the date this was done.

1406. SFA written food safety plan implemented?

Finding 9000: Food Safety-Vendor

Issue: 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. This is a repeat violation from the review conducted in November 2013.

Corrective Action:

Corrective Action Needed:

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/nsfp/>
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.

1407. Temperature logs available?



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Finding 9000: Delivery Receipts

Issue: The delivery receipts are not always being completed: the temperature is not being taken and recorded, the amount of meals delivered is not being recorded and the receipts are not being signed.

Corrective Action:

Corrective Action Needed:

1. Write a procedure on receiving the meals including completion of the delivery receipts with a signature, taking temperatures and comparing what is delivered to the menu.
2. Train all staff that receives meals on the procedure.
3. Submit to HCNP a copy of the training records for the procedure including the agenda and sign in records.
4. Submit to HCNP copies of 2 weeks of correctly completed delivery receipts.

1407. Temperature logs available?

Finding 9000: Production Records and Delivery Receipts

Issue: 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:

Corrective Action Needed:

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.

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

Finding 9000: Area: Food Safety-Vendor

Issue: The following additional violations were observed during the review in November 2016:

1. Soap and cleaning supplies are stored in the same area as food and beverages.
2. Cardboard boxes were being used as mats on the floor instead of nonslip mats.
3. Food is left uncovered in the preparation area.
4. 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.
5. There is no log for the sanitizer in the dish/pot washing and sanitizing sink.
6. Personal items (backpacks) are being stored in the food preparation area.
7. 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:

Corrective Action Needed:

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.

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

Finding 9150: Storage violations were observed. *Repeat Finding

The SFA must ensure that all of its facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. Issue: The following are repeat violations from the review



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conducted in November 2013:

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.

Corrective Action:

Corrective Action Needed:

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.