



SNP Administrative Review Findings
Program Year 2017

St. Catherine School PS (4405-9)

St. Catherine School PS (4405-9)
5021 Kawaihau Rd
Kapaa, HI 96746

Food Service Contact
Cafe Manager
(808) 822-4212

Executive Contact
Principal
(808) 822-4212

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

Verification - St. Catherine School PS (4405-9)

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

Finding 9039: Applications not properly selected for verification.

The applications selected for verification were not appropriately selected for the sample size option used.

- 1. The SFA had three error prone applications, but none were selected for verification. The SFA must randomly select from the error prone applications.
2. For the application that was selected for verification, the household reported net income rather than gross income. The pay stubs provided document that the household qualifies for reduced price, not free meals.

Corrective Action:

- 1. Send a letter to the family notifying them of the change. Give them 10 calendar days to appeal. After the 10 days, if there is no appeal, make the change in the POS.
2. Submit to HCNP a copy of the letter and a copy of the POS showing the change was made.
3. Describe to HCNP how the SFA will correctly select the application(s) to verify. Include in the explanation how error prone application will be identified and selecting from error prone applications first.

Meal Counting & Claiming - St. Catherine School PS (4405-9)

314. SFA following approved SFA-SA agreement?

Finding 9049: SFA not following the approved SFA-SA Agreement and/or Application.

The SFA is not following their approved SFA-State agency permanent Agreement. The SFA is not following their approved SFA-State agency Application, including the Point of Service procedures. Discrepancies between approved documentation and observations on site:

- 1. The sharing table is positioned in the front of the point of service (POS).
2. Students are able to see the POS computer screen.

Corrective Action:

- 1. Position the sharing table immediately after the POS to ensure each student has a reimbursable meal when the student comes to the meal clerk. Once the student passes the meal clerk, the student can place the unwanted milk on the sharing table right after the meal clerk. Describe to HCNP how and when this issue was corrected.
2. Position the meal clerk and the POS in a way so that the students cannot see the computer screen to prevent students from looking at any confidential information. Describe to HCNP how and when this issue was corrected.

Resource Management - St. Catherine School PS (4405-9)

702. Year-end expenses in excess of revenues requiring general fund transfer?

Finding 9000: Area: Nonprofit Food Service Account-Annual Financial Report

Issue: The Annual Financial Report must be revised.

- It did not include the deferred revenue for the carryover amount of students' account for the next school year.



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Corrective Action:

Corrective Action Needed:

Revise the Annual Financial Report and submit it to HCNP.

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

Finding 9000: Area: Nonprofit Food Service Account

Issue: Unallowable costs were found in the nonprofit food service account for July 2015 – June 2016.

1. Invoices for saimin were purchased monthly and charged to the nonprofit food service account. On the last Administrative Review we found that saimin was being served a la carte during breakfast. This was not allowed because it does not meet the Smart Snacks requirements. Also, the food service manager mentioned the saimin was given to the foodbank. For this school year, we did not find any invoices for saimin.

2. There was an invoice that included the remarks "Carnival" for luau leaves that were charged to the nonprofit food service account.

Corrective Action:

Corrective Action Needed:

Remove unallowable costs from the nonprofit food service account. Once completed, print and submit to HCNP a revised general ledger, balance sheet, and profit and loss statement for the nonprofit food service account.

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

Finding 9000: Area: Nonprofit Food Service Account

Issue: Unallowable costs were found in the nonprofit food service account for July 2016 – present. Only expenses for items during the period that the SFA was allowed to serve meals and claims meals in the nonprofit school food service account may be charged to this account. Any expenses from July 1 –September 26, 2016 are unallowable because the SFA was not allowed to participate in the program during that time. The SFA was allowed to serve NSLP/SBP on September 26. These expenses must be removed and paid with general funds. This, but is not limited to, the following:

1. An invoice for \$49.35 dated 8/17/16 cannot be charged for to the nonprofit school food service account.

2. Charges for the cafeteria worker has charges for pay period 7/29/16 to 9/11/16.

3. Charges for Cafeteria Non Food Service

Corrective Action:

Corrective Action Needed:

Remove all unallowable costs from the nonprofit food service account. Once completed, print and submit to HCNP a revised general ledger, balance sheet, and profit and loss statement for the nonprofit food service account.

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

Finding 9000: Nonprofit Food Service Account

Issue: On the general ledger, there was a transaction for a check rejected due to insufficient funds. The nonprofit school food service account cannot be charged for any late or delinquent fees. It must be paid with general funds outside of the nonprofit school food service account.

Corrective Action:

Corrective Action Needed:

Remove unallowable costs from the nonprofit food service account. Once completed, print and submit to HCNP a revised general ledger, balance sheet, and profit and loss statement for the nonprofit food service account.



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706. *Paid Lunch Equity Tool used, weighted minimum average Paid lunch price charged at all sites?*

Finding 9000: Area: Paid Lunch Equity (PLE)

Issue: The Paid Lunch Equity tool submitted to HCNP was blank/incomplete.

Corrective Action:

Corrective Action Needed:

Submit to HCNP a completed and signed PLE tool for 2016 which was due 10/14/16 to HCNP.

Resource Management Comprehensive Review - St. Catherine School PS (4405-9)

763. *NonProgram Food Participation*

Finding 9000: Area: Nonprogram Revenue

Issue: The SFA is allowing teachers to eat for free, but the SFA does not have documentation of the number of meals served to the teachers. Documentation is required due to nonprogram revenue requirements (SP 39-2011 Revised).

Corrective Action:

Corrective Action Needed:

Submit to HCNP a written procedure on how the SFA is tracking the number of meals served to teachers.

General Program Compliance - St. Catherine School PS (4405-9)

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

Finding 9000: Area: Civil Rights

Issue: The SFA only has documentation that two staff (food service manager and NSLP Coordinator) completed civil rights training. All employees that are involved with any part of the Child Nutrition Programs must be trained on civil rights. This includes the confirming official and the hearing official for meal applications.

Corrective Action:

Corrective Action Needed:

1. Train the all appropriate staff on civil rights (including the confirming and hearing official). See the civil rights PowerPoint presentation on HCNP's website: <http://hcnp.hawaii.gov/civil-rights-2/>
2. Submit training documentation (date of training, sign-in sheet, agenda).
3. Assure HCNP that all school staff involved with any part of the Child Nutrition Programs will be trained on civil rights and training documentation will be maintained annually.

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

Finding 9000: Local Wellness Policy

Issue:

1. The 2004 requirements for the Wellness Policy require a plan for measuring the implementation of the Local Wellness Policy. The SFA's plan is not written in the policy.
2. The Wellness Policy is not signed by the stakeholders.
3. The Wellness Policy is not available to the public on the SFA's website.

Corrective Action:

Corrective Action Needed:

Provide documentation to HCNP that each issue above has been corrected.



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

Finding 9000: Professional Standards

Issue: The SFA hired a new food service director/manager without consulting HCNP. The new food service director/manager does not meet the minimum hiring requirements.

Corrective Action:

Corrective Action Needed:

Assure HCNP that the SFA will ensure the minimum hiring requirements are met when hiring a new food service director/manager. Assure HCNP that if the candidate does not meet the minimum hiring requirements, the SFA will consult with HCNP for approval of the candidate.

1502. Records maintained for PLE and revenue from nonprogram foods?

Finding 9000: Production Records

Issue: Production records were incomplete or incorrectly completed.

The following required sections/columns were not being completed on the production record:

1. Adult Servings
2. Leftover
3. # of Meals Planned and Served for grades 9-12
4. Type of fruit served (only "fruit" was listed)

Milk is not being documented correctly. For example, on 12/7/16, the planned number of meals was 25 for breakfast. On the production record, 25 milks of each type were listed as the amount needed and prepared. A total of 23 breakfasts were served but it was documented on the production record that 23 portions of each milk type were served equaling 46 total milks served. This does not reflect what was observed or documented as meals served.

Time and initials are not being documented next to each food temperature.

Technical assistance was provided on forecasting, taking inventory of milk before and after meal service to help complete the production record correctly.

Corrective Action:

Corrective Action Needed:

1. Submit two weeks of completed breakfast and lunch production records in the month of January/February to show that all of the issues above are being completed correctly.
2. Submit production records that reflect the revised cycle menus for breakfast and lunch that meet the meal pattern requirements. Complete all sections that can be completed prior to meal service (the columns on the left half of the production record).



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St. Catherine School (803-PS)

Food Service Contact

5021 Kawaihau Rd
Kapaa, HI 96746

FSM
(808) 822-4212

Month of Review: November 2016

Date of Onsite Review: December 6, 2016

Meal Components & Quantities - St. Catherine School (803-PS)

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

Finding 9052: Day of Review portion sizes insufficient.

Issue:

Day of Review - Lunch (Chicken Tenders):

- The minimum daily grain requirement was not met for grades Pre-K – 8 and grades 9-12. It is estimated that grades Pre-K – 8 only had 0.25 oz eq of grain (short 0.75 oz eq) and grades 9-12 had 0.5 oz eq of grain (short 1.5 oz eq). Also, the product is not whole grain-rich.

- The chicken tenders that were served do not have a Child Nutrition (CN) label or any product information on how the product contributes towards the meal pattern requirements. The pieces were not uniform. Most students were served three pieces and some students were served 2 big pieces. The SFA was informed to stop purchasing and serving this product.

Corrective Action:

Corrective Action Needed:

1. Stop the purchase and service of this chicken tender product. Look for a chicken tender product with a Child Nutrition label or a Manufacturer's Product Formulation Statement. Provide a copy of CN label or Manufacturer's Product Formulation Statement and the ingredient list of the chicken tender product that will be served.

For more information on Child Nutrition Labels and Product Formulation Statements, go to:

<https://www.fns.usda.gov/cnlabeling/general-background>

<https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>

<https://www.fns.usda.gov/sites/default/files/cn/manufacturerPFStipsheet.pdf>

2. Explain how the meal pattern requirements will be met when the chicken tender menu is served (how many pieces of chicken tenders will be served to each grade group and if any other grain will be served to meet the grain requirement for each grade group).

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of meal component(s) 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: On 12/6/16, fluid milk was not available in at least the two required varieties throughout the lunch serving period. Only 1% white milk was available. The SFA ran out of fat free chocolate milk

Corrective Action:

Corrective Action Needed:

1. Determine how much of each milk type to order for each meal.

2. Maintain accurate records (on the production record) of how many of each milk type the students take at each meal to help determine how much milk to order.



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3. Describe to HCNP what action the SFA took to assure that two milk types are available throughout each meal service daily.

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 9058: Age/grade group meal pattern requirements not being met for multiple menus and/or multiple age/grade groups served.

Issue: The SFA stated that they have recently been serving students in grades 9-12.

1. The SFA does not have any documentation of what was served and how much was served to grades 9-12 on their production records. Therefore, it cannot be determined if the meal pattern requirements were met for grades 9-12.
2. The meal clerk and food service manager could not accurately answer questions about the meal pattern requirements for grades 9-12 and adults.
3. The SFA's application does not indicate that grades 9-12 are being served breakfast or lunch. Since the SFA is serving grades 9-12 at lunch, the SFA is required to implement OVS at lunch for grades 9-12. During lunch service, it was observed that the high school student was served all food items. Technical assistance was provided to both the food service manager and meal clerk on how to implement OVS for grades 9-12 at lunch.

Corrective Action:

Corrective Action Needed:

1. Review the attached meal pattern requirements for grades 9-12 for breakfast and lunch.
2. Revise the breakfast and lunch cycle menus to meet the meal pattern requirements for all grades (including grades 9-12).
 - For lunch, determine the planned portion sizes to be offered to grades 9-12. The SFA must have a planned menu for grades 9-12 because the requirements are different for grades K-8 and 9-12.
 - For breakfast, determine if the current breakfast cycle menu meets the meal pattern requirements for grades K-12. It is acceptable to have one menu for grades K-12 since the requirements overlap.Use the HCNP Menu Planning Template which can be found at: <http://hcnp.hawaii.gov/overview/nsfp/>. Submit to HCNP the completed HCNP Menu Planning Template for each week of the breakfast and lunch cycle menu.
3. Complete the USDA Certification Worksheets for each week of the breakfast and lunch cycle menu to demonstrate the menus meet the meal pattern requirements for grades 9-12. Submit to HCNP the completed Certification Worksheets for breakfast (for grades K-12) and lunch (for grades 9-12).
4. Submit CN labels/product formulation statements and ingredient lists for processed items that are on the menu.
5. Revise the SFA's application in HCNP Systems to indicate the SFA is serving grades 9-12 and that OVS is implemented for grades 9-12 at lunch.
6. Describe how the SFA will implement OVS for grades 9-12 at lunch.

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 9000: Meal Components and Quantities



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Issue: The week of 11/14 – 11/18/16 was selected for review. This week did not meet the meal pattern requirements. The following issues were found:

Lunch:

- The starchy vegetable requirement was not met (short ¼ cup). Not meeting the vegetable subgroup requirement is a repeat finding. The AR conducted in SY 14-15 identified that the red/orange and beans requirements were not met.
- The whole grain-rich requirement was not met (cornbread and roll were not whole grain-rich). The cornmeal is enriched and the flour blend used is 55% whole grain resulting in the cornbread not meeting the whole grain-rich requirement.

Fiscal action will be taken on one day during the week of 11/14 – 11/18/16 for the repeat finding of not meeting the vegetable subgroup requirements.

The review period was expanded to the entire month of November for lunch. It was found that the whole grain-rich requirement was not met (hamburger buns and rolls were not whole grain-rich). The SFA did not have a label for the tortilla chips that were served so it could not be determined if the tortilla chips are a whole grain-rich product.

Corrective Action:

moved to question 410

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).

***Repeat Finding**

Issue:

On 12/7/16, the daily vegetable requirement was not met at lunch. The planned menu indicated that salad and broccoli should have been served; however, only salad was served. The manager stated that she had dropped the broccoli so none was served.

Technical assistance was provided on the importance of meeting the daily vegetable requirement which could have been met by serving a larger portion of salad or by serving another vegetable.

Not meeting the daily vegetable requirement is a repeat finding. This was identified in the AR conducted in SY 14-15. Fiscal action will be taken on meals served on 12/7/16.

Corrective Action:

Corrective Action Needed:

1. Review the attached meal pattern requirements and review the HCNP Meal Pattern PowerPoint training presentation. A copy of the training presentation was provided to St. Catherine on September 23, 2016. Provide assurance that these have been completed.
2. Describe to HCNP how the SFA will ensure the meal pattern requirements are met daily.

Technical Assistance:

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

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. *Repeat Finding

Issue: The week of 11/14 – 11/18/16 was selected for review. This week did not meet the meal pattern requirements. The following issues were found:

Lunch:

- The starchy vegetable requirement was not met (short ¼ cup). Not meeting the vegetable subgroup requirement is a repeat



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finding. The AR conducted in SY 14-15 identified that the red/orange and beans requirements were not met.
• The whole grain-rich requirement was not met (cornbread and roll were not whole grain-rich). The cornmeal is enriched and the flour blend used is 55% whole grain resulting in the cornbread not meeting the whole grain-rich requirement.

Fiscal action will be taken on one day during the week of 11/14 – 11/18/16 for the repeat finding of not meeting the vegetable subgroup requirements.

The review period was expanded to the entire month of November for lunch. It was found that the whole grain-rich requirement was not met (hamburger buns and rolls were not whole grain-rich). The SFA did not have a label for the tortilla chips that were served so it could not be determined if the tortilla chips are a whole grain-rich product.

Corrective Action:

Corrective Action Needed:

1. Review the attached meal pattern requirements. Revise the lunch cycle menu to meet the meal pattern requirements. Use the HCNP Menu Planning Template which can be found at: <http://hcnp.hawaii.gov/overview/ns1p/>. Click on New Meal Pattern. Submit to HCNP the completed HCNP Menu Planning Template for each week of the cycle menu.
2. Complete the USDA Certification Worksheets for each week of the lunch cycle menu. Submit to HCNP the completed Certification Worksheets for lunch for grades K-8 and 9-12.
3. All grain products must be whole grain-rich (at least 50% of the product is whole grain and the remaining grain is enriched). For more information, review the USDA Whole Grain Resource at: <https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>. Find products that meet the whole grain-rich requirements. Submit documentation (product labels, ingredient lists, product formulation statements) to demonstrate the products that are served are whole grain-rich.

Suggestion for cornbread: consider using whole wheat flour instead of the flour blend.

Technical Assistance:

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

502. DOR - Signage explaining OVS reimbursable meal near/at beginning of service line?

Finding 9080: No signage explaining what constitutes a reimbursable meal under Offer vs. Serve.

Issue: OVS signage is not posted at or near the beginning of the serving line.

Corrective Action:

Corrective Action Needed:

1. Post signage explaining what constitutes a reimbursable meal near or at the beginning of the serving line. HCNP recently mailed to the SFA OVS signage for breakfast and lunch. Post the applicable poster(s) – post the lunch poster if only implementing OVS at lunch; post both if implementing OVS at breakfast and lunch.
2. Describe where the poster(s) was posted and provide the date this was completed.

Technical Assistance:

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

General Program Compliance - St. Catherine School (803-PS)

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.

Issue:



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1. The old Justice for All poster is posted in the administrative office.
2. The civil rights binder has outdated forms in it.

Corrective Action:

Corrective Action Needed:

1. Remove the old Justice for All poster and replace it with the new one (green). This was corrected on 12/7/16.
2. Update the civil rights binder by replacing the old forms with the new forms. This was corrected on 12/7/16.

1403. Food safety plan - written, copy available?

Finding 9000: Food Safety

Issue: The SFA's written food safety plan was incomplete. The Process Approach section was not completed.

Corrective Action:

Corrective Action Needed:

1. Complete the Process Approach section in the SFA's food safety plan.
2. Provide the date this was completed.

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

Corrective Action:

Corrective Action Needed:

Post the most current food safety inspection in a publicly visible location. This was corrected on 12/6/16.

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

Finding 9150: Storage violations were observed.

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. [Temperature is not appropriately maintained for [equipment] [All food is not stored at least 6 inches off the floor] [The food storage facility is unclean and/or disorderly] [Canned goods were observed with bulges, leaks and/or dents] [Chemicals are not clearly labeled and/or stored away from food and food-related supplies] [Open bags of food are not stored in containers with tight-fitting lids] [The First In, First Out (FIFO) inventory management method is not being used] [Evidence of pests were observed].

1. Food items in the storeroom are not being dated with day of receipt. Label items with the month and year.
2. Food temperatures on the production records for the review period are in the danger zone. Examples: Turkey links at 91 degrees, chicken thigh at 96 degrees, and hapa rice at 81 degrees. Corrective action should have been taken immediately to ensure food is being cooked to the proper temperature.
3. Temperatures on the production records were also altered after the fact. For example, on the production record dated 11/16/16 (submitted to HCNP on 11/29/16), the temperature for the turkey links was 91 degrees. During the on-site review (on 12/6/16), on the same production record dated 11/16/16, the temperature for the turkey link was whited out and changed to 180 degrees. Changing records after the fact and using white out are not acceptable. HCNP trained on how to correctly make corrections – draw a line through the error, make the correction, initial, and date.
4. The wooden work table must be discarded. Bacteria grow in the cracks in the wood. Replace with NSF approved stainless steel table. Note: consider applying for the NSLP Equipment Grant if eligible. Contact the Program Specialist at HCNP for guidance.



5. Standard Operating Procedures (SOPs) are not being followed: receiving deliveries, calibrating thermometers, cooking potentially hazardous foods, and holding hot and cold potentially hazardous foods.

Corrective Action:

1. Describe how each of the issues above has been corrected.
2. Provide the date each issue was corrected.

Technical Assistance:

- Defrost reach in the freezer
- Keep chilled canned fruit in the refrigerator to prevent rusting
- Donate food that will not be used by school meal programs
- Separate church food from the school meals food
- Remove canned items from cardboard boxes to prevent attraction of roaches