

# Hawaii Department of Education

## SNP Administrative Review Findings

**Bobby Benson Center (1418-4)**

*Program Year 2017*

### **Bobby Benson Center (1418-4)**

56-660 Kamehameha Highway  
Kahuku, HI 96731

### **Food Service Contact**

Primary Cook  
(808) 293-7555

### **Executive Contact**

Executive Director  
(808) 293-7555

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

## **Certification and Benefit Issuance - Bobby Benson Center (1418-4)**

*124. Certification/Benefits Issuance and Verification N/A due to SFA-wide criteria*

### **Finding 9000: Certification and Benefit Issuance**

The SFA does not have a completed Statement of Facts on file explaining the residents' eligibility for free meals.

#### **Corrective Action:**

Complete the Statement of Facts form. The form was provided and completed by the SFA during the on-site review. Informed the SFA to keep this completed form in their files.

## **Resource Management - Bobby Benson Center (1418-4)**

*701. Year-end review of total revenues and expenses?*

### **Finding 9000: Resource Management: Annual Financial Report; Reporting and Recordkeeping**

The SFA did not complete or submit the Annual Financial Report by the specified deadline. HCNP uses this report to monitor the SFA's average monthly expense.

#### **Corrective Action:**

1. Complete the Annual Financial Report and submit it to HCNP. The SFA completed the Annual Financial Report during the on-site review on 11/30/16.
2. Describe to HCNP how the SFA will meet future HCNP deadlines

## **General Program Compliance - Bobby Benson Center (1418-4)**

*810. Non-discrimination on appropriate Program materials?*

### **Finding 9000: Civil Rights**

The following were observed during the on-site review:

- Menus do not include civil rights statement
- Civil rights binder is incomplete
- Complaint log is not maintained every school year
- Complaint procedures have not been updated to include the USDA requirements
- No documentation was kept for any civil rights training conducted

#### **Corrective Action:**

1. Update menus with the correct nondiscrimination statement. Submit to HCNP a copy of the January menu with the correct nondiscrimination statement.
2. Complete civil rights binder to include the complaint log, complaint form, complaint procedures, FNS Instructions 113-1, and civil rights training documentation. Assure HCNP the civil rights binder is complete with all of these documents.
3. Update complaint procedures to include the USDA requirements (complainant has 180 days to file a complaint and the civil rights complaint form must be forwarded to HCNP within 5 working days).
4. Maintain a civil rights complaint log each school year. Assure HCNP this has been done for this school year and that this will be done for each school year.
5. Train all appropriate staff on civil rights. Submit training documentation showing that all appropriate staff was trained on civil rights (date of training, sign-in sheet, and agenda).

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6. Assure HCNP that civil rights training will be completed and documentation will be maintained annually.

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

**Finding 9000: Wellness Policy**

There are many areas in which the Wellness Policy can be improved:

1. Expand on the policies and procedures regarding the foods and beverages parents are allowed to bring their child.
2. Improve verbiage of the Wellness Policy so that it does not seem as redundant
3. Establish a plan for measuring implementation of the Local Wellness Policy.
4. Post Wellness Policy in a location on the school website so that it is easier for the community to find and access.

**Recommendations:**

- Begin keeping records of Wellness Policy reviews and changes made, if any.
- Begin developing a revised Local Wellness Policy during SY 16-17 that complies with the final rule: [https://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](https://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). The final rule must be implemented by June 30, 2017.

**Corrective Action:**

1. Update the Wellness Policy to include issues #1-4 listed above. Submit a copy to HCNP.
2. Post the Wellness Policy in a location on the SFA's website that is easier for the community to find and access. Provide HCNP with the website and describe where the Wellness Policy is located.

*1219. Frequency of tracking training hours*

**Finding 9000: Professional Standards - Training records**

Training records were not available for review. The SFA is not maintaining documentation of training hours completed for each employee to demonstrate meeting the USDA's Professional Standards training hours requirement.

**Corrective Action:**

Complete the tracking log to keep track of employees' training hours. Submit a plan on how each school nutrition program employee will meet the required training hours by the end of SY 16-17.

# Hawaii Department of Education

## SNP Administrative Review Findings

Bobby Benson Center (1418-4)

### Program Year 2017

#### Bobby Benson Center (900-RCC)

56-660 Kamehameha Highway  
Kahuku, HI 96731

#### Food Service Contact

Primary Cook  
(808) 293-7555

Month of Review: October 2016

Date of Onsite Review: November 29, 2016

### Other Federal Programs - Bobby Benson Center (900-RCC)

#### 6. Day of review Menu, Meal Patterns, Production records.

##### **Finding 9000: For the month of October 2016, production records were incomplete or there was no record.**

##### Issue:

For the month of October 2016, production records were incomplete or there was no record.

##### Breakfast

- No production records: 10/2, 10/3, 10/6, 10/7, and 10/8/16.
- Production records did not list all food components: 10/13 (no grain), 10/14 (no fruit), 10/19 (no milk), and 10/24/16 (no fruit).

##### Lunch

- No production records: 10/2, 10/7, and 10/8/16.
- Production records did not list all food components: 10/9 (no fruit), 10/10 (no vegetable), 10/15 (no grain), 10/16 (no grain), 10/21 (no grain), 10/26 (no grain), and 10/30 (no vegetable).

The following sections/columns are not being completed on the production record: "Cup or Ounce Equivalent," "Total Projected # of Servings," "Total Amount Prepared," "Time, Temperature, Initials," "Student Servings," "Adult Servings," "A la carte Servings," "Leftover," and "# of Meals Planned and Served." It was also noted that the menu on the top portion of the production record did not match the food items listed below. Remember that adult meals need to be documented.

Receipts were provided to demonstrate that the SFA had the components on hand for all dates specified above except for breakfast on 10/3/16. The receipt for the grain component was not provided. Breakfasts served on this day will be disallowed.

Provided technical assistance to the Primary Cook and Operations Manager prior to the on-site review and during the on-site review on the importance of completing production records since they serve as proof that reimbursable meals were prepared and served and how they contribute to the required food components and quantities for each age/grade group. It was explained to the Primary Cook and Operations Manager how to properly complete the production records, emphasizing that all sections/columns must be complete. The Primary Cook was also shown how to use the Institute of Child Nutrition Food Buying Calculator to help determine how much food to purchase/prepare and how to use this information to complete the production records. HCNP advised the SFA to:

1. Type all of the planned information (left half of the production record) on the production record prior to the day of service. This is critical so the cooks know what and how much to prepare and serve.
2. Complete day of service information (right half of the production record) during meal preparation.

Since the production records serve as proof that reimbursable meals were served, the records must be completed correctly. Remember to list all food items that were served – all food components and condiments. Document any substitutions that were made.

##### **Corrective Action:**

##### Corrective Action Needed:

1. Complete production records daily. Explain how this will be done.
2. Submit two weeks of completed breakfast and lunch production records in the month of January.

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3. 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.

#### 6. Day of review Menu, Meal Patterns, Production records.

##### **Finding 9226: Production records do not support planned portion sizes to meet meal pattern component requirements.**

Production records for daily menus do not list each meal component and reflect that the planned portion sizes meet the meal pattern component requirements.

Currently, the cycle menu contains one week of snacks for the Afterschool Snack Program. The menu lists different serving sizes for girls and boys. It is not acceptable to serve different portion sizes based on sex/gender.

##### **Corrective Action:**

1. Provide assurance that the serving of different portion sizes based on sex/gender has stopped.
2. Provide the date this practice was stopped.

#### 7. Site monitored in first 4 weeks of operation, date, deficiencies/CA?

##### **Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first 4 weeks of operation each year.**

Afterschool Snack Program operation at this site:

SFA did not conduct the first review during the first four (4) weeks of operation.

##### **Corrective Action:**

Complete the first review immediately. The SFA completed the first review on 11/29/2016.

Reminder: complete the second review before the end of the school year.

#### 11. DOR and Review Period Snacks missing components. Enter data

##### **Finding 9000: Afterschool Snack Program. The SFA has a one week cycle menu for snack, but not followed**

The SFA has a one week cycle menu for snack. However, the production records indicate that this one week menu is not being followed every week.

Production records were missing for the following dates: 10/2, 10/5, 10/7, 10/7, 10/8, and 10/29/16.

Receipts were provided to demonstrate that the SFA had the components on hand for all dates specified. However, on 10/29/16, veggie straws/chips were served. This is not a creditable item and does not count toward the meal pattern requirements. Therefore, snacks served on this day will be disallowed.

In reviewing the Afterschool Snack production records, the following were found:

- Meal pattern requirements are not being met. Serving sizes were either insufficient, not listed, or were not consistent. Examples:
  - Insufficient quantity: on 10/10/16, the production record listed ½ cup of apple and 1 cup of milk was served. Not enough fruit was served. A ¾ cup portion of fruit/vegetable must be served to be counted as one of the two required components.
  - Serving sizes were not listed: on 10/4/16, the production record listed chocolate chip cookies and 1% or skim milk
  - Serving sizes were not consistent: on 10/20/16, the production record listed 12 wheat thins, 1 oz cheese, and milk but on 10/23/16, production record listed 6 wheat thins and 1 cup of milk.
  - A peanut granola bar label was submitted. This granola bar does not meet the grain requirements.
  - Store bought trail mix is being used. Store bought trail mix cannot be served. Technical assistance was provided on if trail mix is served, it must be made by the SFA (buy nuts and dried fruit separately and mix it together to ensure the component(s) are met).
  - When fruit cup was served, the fruit cup is a ½ cup serving. Therefore, the fruit component was not met since ¾ cup is

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required.

- Production records were incomplete. At most, the food items were listed.

Note: Milk and another component are served every day. It is acceptable to serve milk as one of the components every day; however, technical assistance was provided on milk not being a required component for snack. Any two components in the minimum required quantities may be served.

#### **Corrective Action:**

1. Revise the snack cycle menu to meet the meal pattern requirements.
2. Describe how each of the issues above has been corrected. If granola bar remains on the snack menu, purchase a different granola bar that contains mostly grains as opposed to peanuts and sugar. Provide a copy of the nutrition facts label for the new product. If trail mix is served, provide the recipe demonstrating the component(s) are met.
3. Complete production records daily. Complete all of the columns on the production record.
4. Submit to HCNP two weeks of completed production records.
5. Submit production records that reflect the revised cycle menu for snack that meet the meal pattern requirements. Complete all sections that can be completed prior to meal service.

### Meal Counting & Claiming - Bobby Benson Center (900-RCC)

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

#### **Finding 9000: Meal counting is not being done at the point of service**

Meal counting is not being done at the point of service. Point of service means when the student receives a reimbursable meal. During the on-site review, it was observed that three out of the four meal counting staff waited until most/all of the students received a reimbursable meal before recording the meal counts. This is not acceptable.

#### **Corrective Action:**

1. Meal counting must be done at the point of service. Submit written meal counting procedures that all meal counting staff are to follow.
2. Retrain all meal counting staff on the correct way to do meal counting at the point of service.
3. Submit training documentation (date of training, sign-in sheet, agenda).
4. Provide the date this was corrected.

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

#### **Finding 9000: The SFA is not following their approved SFA-SA agreement/application in HCNP Systems**

The SFA is not following their approved SFA-SA agreement/application in HCNP Systems. The SFA indicated on their application that meals are counted at the beginning of the serving line with an adult checking the meals at the end of the serving line. This was not being done during the on-site review. It was observed that an adult is counting the meals after the students receive their meal.

#### **Corrective Action:**

1. Revise the application in HCNP Systems to indicate that meals are being counted at the end of the line.
2. Provide the date this was completed.

### Meal Components & Quantities - Bobby Benson Center (900-RCC)

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

#### **Finding 9000: The SFA does not have the proper serving utensil to serve 1 cup of rice.**

The SFA does not have the proper serving utensil to serve 1 cup of rice. The SFA currently has a #6 disher which measures 2/3 cup.

#### **Corrective Action:**

1. Purchase a #8 disher (measures ½ cup of rice). TA was provided on-site to serve two #8 scoops of rice to equal to a 1 cup serving.

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2. Submit the receipt to show that a #8 disher was purchased.
3. Assure HCNP that two #8 scoops will be used to serve 1 cup of rice when 1 cup of rice is listed on the menu and production record.

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

1. On 11/29/16, the minimum daily grain requirement was not met at lunch. Brown rice was written on the menu; however, it was observed that the SFA serves Hapa Rice. The white rice that is being used is not enriched and cannot be counted toward the meal pattern requirement. Therefore, out of the 1 cup of Hapa Rice that was served, only ½ cup of rice is creditable which means the SFA served a 1 oz eq of grain for lunch. Since the daily grain requirement for lunch is 2 oz eq, the SFA was short 1 oz eq of grains.
2. The SFA had two bags of brown rice in storage during the on-site review. One bag was a quick cooking brown rice. Quick cooking and milled brown rice do not meet the whole grain rich requirement.
3. The whole grain-rich requirement was not met at breakfast. The bagel was not whole grain-rich.

**Corrective Action:**

1. Discontinue the use of serving white rice that is not enriched for breakfast and lunch. Find a white rice product that is enriched or serve all brown rice.
2. Discontinue the use of serving quick cooking brown rice. Find a brown rice product that is not quick cooking and that is not milled to serve at breakfast and lunch.
3. Describe to HCNP what rice products will be used to meet the meal pattern requirements. Submit labels of the products (including the ingredient list).
4. Find a bagel that meets the whole grain-rich requirement. Submit labels of the products (including the ingredient list) that will be offered.

**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. Milk was not available in at least the two required varieties throughout the lunch service. There were two types of milk available during the first lunch service (girls). However, during the second lunch service (boys), only unflavored fat-free milk was made available on the serving line. Staff was informed that two types of milk must be available. This was corrected, however, only one out of the seven boys had both milk types to choose from.

**Corrective Action:**

Assure HCNP that two acceptable types of milk are available to all residents throughout the 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.**

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There is no signage explaining to students what constitutes a reimbursable breakfast or lunch.

**Corrective Action:**

1. Post signage (monthly menu) that explains what constitutes a reimbursable meal for breakfast and lunch at or near the beginning of the serving line.

On 11/30/16, a weekly menu (without dates) was posted at or near the beginning of each serving line. However, it was strongly recommended that the SFA post a monthly menu (with dates) so the posted menu does not need to be changed every week.

2. Describe to HCNP what the SFA has decided to post as signage.

**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 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met.**

Based on a review of production records and other supporting food crediting documentation for 1 week during the Review Period, some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served.

**Breakfast**

- Weekly grains greatly exceeded the maximum limit.

**Lunch**

- Daily vegetable requirement was not met.
- Weekly vegetable requirement was not met.
- Dark green and beans requirements were not met.
- Daily fruit requirement was not met.
- Weekly fruit requirement was not met.
- Daily meat/meat alternate requirement was not met.
- Weekly meat/meat alternate greatly exceeded the maximum limit.
- Daily grains requirement was not met.
- Weekly grains requirement was not met.

The review period was expanded to the entire month of October 2016. The following issues were found:

**Breakfast**

- Weekly grains greatly exceeded the maximum limit.

**Lunch**

- Daily vegetable requirement was not met.
- Beans requirement was not met.
- Daily fruit requirement was not met.
- Weekly fruit requirement was not met.
- Daily meat/meat alternate requirement was not met.
- Weekly meat/meat alternate greatly exceeds the maximum limit.

Whole grain-rich requirement was not met. Most grain items do not meet the whole grain-rich requirement: pancake mix, waffles, English muffin, bread, some breakfast cereals, bagel, quick cooking brown rice, and hamburger buns.

**Corrective Action:**

1. Revise the breakfast and lunch cycle menus to meet the meal pattern requirements. Use the HCNP Menu Planning Template which can be found at: <http://hcnp.hawaii.gov/overview/nslp/>  
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 breakfast and lunch cycle menu. Submit to HCNP the completed Certification Worksheets for breakfast and lunch.
3. All grain products must be whole grain-rich (at least 50% of the product is whole grain and the remaining grain is enriched). Review the USDA More information can be found at: <https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>. Submit documentation (product labels, ingredient lists, product formulation statements) to demonstrate the products are whole grain-rich.

**Technical Assistance:**

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

Provided TA to the Primary Cook and Operations Manager on how to complete production records including using the Food Guide Calculator to help determine how much food to prepare/purchase; explained how the left (planning) columns can be typed so that on the day of service, the right columns are to be completed as opposed to completing everything the day of service.

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

**Finding 9000: Although the cycle menu does not meet the meal pattern requirements, it was found based on observations that the staff are not following the planned menu.**

1. The planned menu lists 1 cup of fruit cup listed. However, the SFA has been serving one fruit cup which provides ½ cup of fruit.
2. The planned menu lists ¾ cup of carrot sticks but the production record indicated that ½ cup was served.
3. The planned menu lists 1 cup of brown rice. However, Hapa rice is served and the white rice used is not enriched.
4. Lunch preparation was observed on 11/30/16. The planned menu stated ¾ cup of carrot sticks for lunch. However, the cook bagged ¼ cup of carrot sticks. The primary cook was informed immediately of this issue. The cook re-bagged the carrot sticks so each bag contained ¾ cup. However, there were not enough carrots sticks on hand so some students received celery sticks instead. This is a concern because if this type of substitution happens often, the meal pattern requirements may not be met.

**Corrective Action:**

Describe how the SFA will follow the revised cycle menu that meets the meal pattern requirements.

*412. Performance Based Reimbursement turned off due to Review Period findings?*

**Finding 9000: Meal Components and Quantities – Standardized Recipes**

Issue:

Standardized recipes are not being used. Standardized recipes are needed as proof that sufficient quantities of the meal components are provided to meet the meal pattern requirements and dietary specifications.

**Corrective Action:**

Corrective Action Needed:

1. Create and follow standardized recipes for menu items on the cycle menu with two or more ingredients. Provide copies of standardized recipes for items on the revised menu.
2. Submit training documentation showing that all appropriate staff were trained on following standardized recipes (date of training, sign-in sheet, agenda).
3. Assure HCNP that standardized recipes are being followed by all food service staff.

*500. DOR - OVS properly implemented, meals with insufficient portion sizes counted for reimbursement? Enter data.*

**Finding 9078: School is not properly implementing Offer vs. Serve.**

Staff was not sure how to implement OVS. It was observed that all breakfast/lunch menu items were pre-plated except for the



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milk. Some students declined milk.

TA was provided on different ways to implement OVS. The SFA stated they will start pre-plating the grain, meat, and fruit, leaving the vegetable and milk as a choice to the students.

#### **Corrective Action:**

1. Describe how OVS is being implemented. Provide the date of implementation.
2. Submit training documentation showing that all appropriate staff were trained on OVS (date of training, sign-in sheet, agenda).

#### **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 9000: Offer vs Serve (OVS) signage**

OVS signage for lunch was posted near both entrances; however, only one OVS for breakfast was posted near one entrance.

#### **Corrective Action:**

Post OVS signage for breakfast at or near the beginning of the second entrance. OVS signage for breakfast was posted on 11/30/16.

## Dietary Specifications - Bobby Benson Center (900-RCC)

### 603. On-site portion of Dietary Specifications Tool completed, TA, CA required?

#### **Finding 9083: Technical Assistance or Corrective Action required for Dietary Specifications and/or Nutrient Analysis.**

Prior to the beginning of the on-site portion of the review, off-site activities pertaining to Dietary Specifications and Nutrient Analysis resulted in areas being identified that required technical assistance or corrective action.

It was identified that the SFA is at a high risk for not meeting the Dietary Specifications regulatory requirements (calories, saturated fat, sodium, trans fat).

The following were identified based on interviewing the food service manager and observations during the on-site review that affect meeting the Dietary Specifications regulatory requirements:

- Self-serve condiment station including: butter, salad dressing, shoyu, ketchup, mustard, BBQ sauce, Tabasco, Sriracha, relish
- Use of full-fat products such as mayonnaise and salad dressings
- Use of regular sodium products
- Use of processed meats several times a week
- Use of non-creditable items that are high in fat and sodium such as potato chips
- No standardized recipes

Not meeting the meal pattern requirements for each grade group

#### **Corrective Action:**

1. Describe to HCNP how each of the above items will be corrected.
2. Provide the date each of the above was corrected.

**IMPORTANT NOTE:** A nutrient analysis must be conducted since the SFA is at high risk for not meeting the Dietary Specifications regulatory requirements. The review must remain open until the nutrient analysis is completed. HCNP will look over the SFA's breakfast and lunch cycle menus submitted. Once it is determined that the cycle menus meet the meal pattern requirements, HCNP will notify the SFA which week will be selected to conduct the nutrient analysis. In order to do the nutrient analysis, labels, ingredient lists, standardized recipes, production records, and other information will need to be submitted.

#### **Technical Assistance:**

Technical assistance provided:

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.

1. The Justice for All (JFA) poster was not posted in a publicly visible location in the office.
2. The new JFA poster was not posted in a publicly visible location in the dining area.

**Corrective Action:**

1. Move the JFA poster from the back of the office to the front of the office. Post it in a publicly visible location. Provide the date this was completed.
2. Post the new JFA poster in the dining area. This was corrected on 11/30/16.

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

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

The SFA does not have a written food safety plan.

**Corrective Action:**

1. Complete the food safety plan. A template is available on HCNP's website at: [www.hcnp.hawaii.gov](http://www.hcnp.hawaii.gov)
2. Provide the date when the food safety plan has been completed. This includes SOPs that have been reviewed, signed, and dated.
3. Assure HCNP that the food safety plan will be reviewed annually and appropriate staff will be trained and documented annually.

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.**

1. The most recent food safety inspection was not posted in a publicly visible location.
2. The SFA has received one food safety inspection during SY 16-17. The SFA was informed to send a written request for a second inspection since the SFA receives one inspection per school year.

**Corrective Action:**

1. Post the most current food safety inspection in a publicly visible location. Provide the date this was completed. This was corrected during the on-site review on 11/30/16.
2. Submit a request to be inspected a second time before the end of the school year. The request was submitted on 11/30/16.

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.

The following were observed in the food pantry:

- Expired boxes of Hamburger Helper were still in the pantry (expiration date of 9/2016).
- Cans of Pork 'n Beans were rusted with the appearance of a spilled substance on top.
- The First In, First Out (FIFO) method was not implemented with various products.
- Cleaning products stored with food items.

In the staff pantry, cleaning supplies were also stored with food items.

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If the Department of Health allows food and cleaning supplies to be stored in the same area, keep the food separate from the cleaning supplies. Do not store food and cleaning supplies on the same storage rack. Clearly label each rack so that the staff knows which rack is used for food and which rack is used for cleaning supplies.

**Corrective Action:**

1. Describe to HCNP how both pantries will be reorganized and how the above issues will be corrected.
2. Include the "Storing and Using Poisonous or Toxic Chemicals" SOP in the food safety plan. Train all employees on the SOP. Submit training documentation (date of training, sign-in sheet, agenda).

*1503. Records retained for 3 years?*

**Finding 9000: SFA could not find production records for 2015.**

Records are not retained for three years after the final claim for reimbursement for the fiscal year or until the resolution of any audits. The SFA could not locate production records for 2015.

**Corrective Action:**

Describe to HCNP how the SFA will maintain records for three years plus the current year or until the resolution of any audits.