

SNP Administrative Review Findings**University Laboratory School (1421-4)***Program Year 2017***University Laboratory School (1421-4)**

1776 University Ave, UHS Bldg. 3, Room 121
Honolulu, HI 96822-2447

Food Service Contact

Office Manager
(808) 956-7833
FSMC: Sodexo America LLC

Executive Contact

Principal
(808) 956-7833

No. of Sites / Reviewed: 1 / 1

Month of Review: December 2016

Certification and Benefit Issuance - University Laboratory School (1421-4)

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

Finding 9000: Certification and Benefit Issuance - issues with the approval of applications

There were issues with the approval of applications. Six meal applications were incomplete:

- 4 applications were missing the social security number
- 2 applications were missing the signature

All six applications were corrected during the on-site review.

The total number of household members was miscounted on one application.

Corrective Action:

1. Describe to HCNP the procedure that will be followed to ensure only completed applications will be processed.
2. Assure HCNP that both the determining and confirming officials will attend the upcoming NSLP training in June which will include the processing of free and reduced price applications.
3. The SFA will be required to conduct an independent review of the applications for SY 2017-18. This requires the confirming official to review all applications before the household is notified of their child's eligibility status. A report is required to be completed and submitted to HCNP.
4. Assure HCNP the SFA will conduct the independent review and submit the completed report to HCNP.

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

Finding 9000: Certification and Benefit Issuance - not using the HCNP letter template

The SFA is not using the HCNP letter template for notifying households of the benefits based on the meal applications. The SFA's letter does not contain all of the required information such as the right to appeal, instructions on how to appeal, and the nondiscrimination statement.

Corrective Action:

1. Assure HCNP that the SFA will use the HCNP notification template immediately.
2. Send HCNP a copy of the SY 2016-17 template that will be used moving forward.

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

Finding 9000: Certification and Benefit Issuance - application for a student

The SFA does not have an application for a student listed as reduced price in the POS system.

The POS system was corrected during the on-site review.

Corrective Action:

No further action required.

Verification - University Laboratory School (1421-4)

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

Finding 9000: Verification - four error prone applications

On the Verification Summary Report (FNS-742), it was reported that there were no error prone applications. During the

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Administrative Review, four error prone applications were found. Error prone applications should be the first applications selected from for verification.

Corrective Action:

1. Describe the process that will be used to select error prone applications beginning SY 2017-18.
2. Prepare a training presentation on selecting error prone applications and submit it to HCNP. This includes talking notes, any handouts and/or activities that would be used to teach someone on this process.

General Program Compliance - University Laboratory School (1421-4)

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

Finding 9000: Civil Rights - incomplete Civil Rights binder

SFA does not have a Civil Rights binder with the required Civil Rights documents: complaint procedure, complaint log, and ethnic data report.

Technical assistance was provide to the office manager on completing the civil rights binder, the purpose, and how to use the forms.

Corrective Action:

A Civil Rights binder was completed during the Administrative Review on 1/27/2017.

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

Finding 9000: Civil Rights - incorrect nondiscrimination statement

The following forms were found to have the incorrect nondiscrimination statement:

- Meal plan order form
- Press release

The following forms did not include the nondiscrimination statement:

- Notification letter of approval/denial
- Complaint policy
- SFA's version of the monthly menu

Corrective Action:

1. Use HCNP's template of the forms listed above, if applicable.
2. Submit to HCNP the corrected documents being used moving forward.

1219. *Frequency of tracking training hours*

Finding 9000: Professional Standards - training logs

The SFA has not been maintaining training documentation for each person required to meet the training standards each school year.

Corrective Action:

1. Read SP 38-2016 to determine which staff to categorize in the appropriate category. Inform HCNP of the final decision.
2. Submit to HCNP the SFA's plan on how each staff member will achieve the required hours of training needed by the end of the school year.
3. Submit to HCNP a copy of the training logs that will be maintained for each staff member.

1500. *Reports submitted to State agency as required?*

Finding 9000: Reporting and Record Keeping - SFA did not submit the documentation

The SFA did not submit the documentation that was requested in order to complete the review of the SFA's menu for the

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review period of December 2016. Therefore, it could not be determined to what extent the SFA is in compliance with the meal pattern requirements.

Corrective Action:

Labels that are still needed to complete the analysis:

- Sliced American Cheese
- Chicken Sausage Patties
- Pancakes
- Bagel
- Updated Ham label (label that was submitted was from 2004)
- SFA submitted two different labels for the waffles. Submit the label of the product that is actually being served.
- Mixed Vegetables served on 12/13/16. The label that was submitted does not support what is documented on the production record. Label lists carrots (22%), corn (22%), green beans(22%), peas (22%) and lima beans (12%). The production record lists diced carrots (1/2 cup), peas (1/8 cup), and green beans (1/8 cup).
- Updated Chicken Meatballs label
- Saimin Noodles
- Pineapple

Clarification Needed:

- The beef stew recipe lists what was done on 12/15/16. Explain how many portions (6 oz. ladle) the recipe made using 70# of stew meat.
- The production record lists a 6 oz. ladle as the serving utensil for the beef stew. Explain how this utensil provides 1 cup of vegetables plus the 2 oz. of meat plus the ground tomatoes.

- 1.Submit all of the requested documentation and information for the products that are used for the SFA's meals.
- 2.Assure HCNP that the vendor will maintain current labels and product information for all food items used for the SFA's meals.

Suggestion: Keep a binder with all food product labels.

*1502. Records maintained for PLE and revenue from nonprogram foods?***Finding 9000: Reporting and Record Keeping - Annual Financial Report**

The Annual Financial Report was not completed correctly. The amounts listed for Student Meal Revenue and Deferred Revenue were not correct.

Corrective Action:

The SFA revised the Annual Financial Report during the on-site review.

*1502. Records maintained for PLE and revenue from nonprogram foods?***Finding 9000: Reporting and Record Keeping - daily delivery receipts**

The vendor does not provide the SFA with daily delivery receipts. Delivery receipts serve as proof that the SFA received what was ordered and that a reimbursable meal was delivered. Delivery receipts must be signed by the SFA and kept on file.

The SFA may either sign off on the production record daily, or the Vendor and SFA may use HCNP's Transport Daily Record template (located at <http://hcnp.hawaii.gov/overview/nsnp/> - click on the Production Record and Transport Daily Record tab).

Corrective Action:

- 1.Describe what the SFA has decided to do for documentation of meals received.
- 2.Submit a week of signed production records or delivery receipts from the month of February.
- 3.Explain to HCNP the process the SFA will take if the vendor were to be missing an item that was ordered.

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University Laboratory School (543-PCS)
1776 University Ave, UHS Bldg. 3, Room 121
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Food Service Contact
Business Manager
(808) 956-7833

Month of Review: December 2016

Date of Onsite Review: January 26, 2017

Meal Counting & Claiming - University Laboratory School (543-PCS)

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

Finding 9000: Meal Counting and Claiming - Meal counting is not being done at the point of service

Meal counting is not being done at the point of service. Meals must be counted at the time the student receives a reimbursable meal. The meal clerk was scanning ID cards prior to students receiving a reimbursable meal.

Corrective Action:

1. Describe the duties of the meal clerk, including how meals will be counted at the point of service.
2. Train all staff with duties related to the meal program on the correct procedure and responsibilities of the meal clerk.
3. Send HCNP a copy of the notification letter sent to the students informing them they cannot have their ID card scanned prior to receiving a meal.
4. After training is completed and the students are made aware of the change, conduct two independent on-site reviews (by different staff members) using the HCNP MC-7 Form. To ensure compliance, submit the completed forms to HCNP. The MC-7 Form is available at: <https://hcnp.hawaii.gov/wp-content/uploads/2016/10/MC7-9.16.pdf>

Meal Components & Quantities - University Laboratory School (543-PCS)

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

Finding 9000: Meal Components and Quantities - menu and OVS signage

- An illegible menu is posted at the end of the serving line.
 - OVS signage specifying the ½ cup fruit/vegetable requirement is posted at the end of the serving line.
- The menu and OVS signage explaining what constitutes a reimbursable meal must be posted at or near the beginning of the serving line.

Corrective Action:

The SFA corrected the menu and OVS signage during the on-site review. No further action required.

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

Finding 9000: Meal Components and Quantities - monthly menus

The monthly menus state that there is a fruit bar for breakfast and a salad bar for lunch. This is not currently being offered to the students.

Corrective Action:

1. Correct the monthly menus to reflect the actual meal service, including listing all food items being offered each day.
2. Submit the corrected menu to HCNP.

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 - meal pattern requirements are not being met for breakfast

The meal pattern requirements are not being met for breakfast. One menu is served to grades K-12 for breakfast. This is

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acceptable as long as all required meal components are present in the correct portion sizes. The following findings were noted:

1. The daily and weekly fruit requirement was not met. On 12/6/2016 and 12/14/2016, the menu was short ½ cup fruit.
2. The daily grain requirement was not met. On 12/13/2016, the menu was short a ½ ounce equivalent of grain. On 12/9/2016 and 12/16/2016, food service staff used a #12 (1/3 cup) for the fried rice. This made the meal short on grains.

Corrective Action:

1. Refer to Basics at a Glance poster that was sent via certified mail. Assure HCNP that the poster will be posted near the service line for foodservice staff.
2. Correct the breakfast cycle menu to meet the meal pattern requirements for grades K-12. Use the HCNP Menu Planning Template (located at <http://hcnp.hawaii.gov/overview/nslp/> - click on the New Meal Pattern tab).
3. Input each week of the corrected cycle menu into USDA's Certification of Compliance Worksheet (located at <https://www.fns.usda.gov/school-meals/certification-compliance-worksheets-5-day-schedule>) to show that the menu meets the meal pattern requirements.
4. Submit product information for processed items to confirm the amounts listed on the cycle menu (food labels, CN labels, product specifications, etc.)
5. Submit the updated menus, the completed HCNP Menu Planning Template for each week of the cycle menu, and all completed USDA worksheets to HCNP.

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 - Standardized serving utensils

Standardized serving utensils are not being used on the meal service line.

At lunch on 1/26/2017, it was observed that the fruit was served with a slotted spoon instead of a utensil such as a spoodle or disher that would provide a standard measurement. The portion of spaghetti sauce being served could not be quantified based on the utensil that was being used. The server stated that the portion of spaghetti noodles (being served with tongs) was 4 ounces and the he knew this because he had weighed out a portion prior to the meal service, and he could tell by the feel that it was 4 ounces. The salad was being served with tongs as well, and the server stated the portion was 1 ½ cups. This does not meet the daily vegetable requirement (short ¼ cup).

At breakfast on 1/27/2017, it was observed that the fruit was again being served with a slotted spoon rather than a spoodle or disher. It appeared that students may have been served ½ cup to ¾ cup of fruit. This does not meet the daily fruit requirement of 1 cup (short ¼ cup to ½ cup).

Corrective Action:

- All production records must list the portion size that will be served to each grade group, and the utensil to use when serving.
1. Refer to Basics at a Glance poster that was sent via certified mail. Assure HCNP that the poster will be posted near the service line for foodservice staff.
 2. Submit to HCNP production records for both the breakfast and lunch cycle menus showing which utensil is to be used for each menu item.
 3. Train all food service staff on the appropriate utensils to use when serving. Submit documentation of training to HCNP (sign-in sheet, date of training, agenda, and training materials).

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

Finding 9000: Meal Components and Quantities - condiments

It was observed during the on-site review that condiments such as soy sauce, salad dressing, ketchup, salt, and pepper were set up at a self-serve station for the students. Self-serve stations are difficult to monitor and control and can lead to a menu being excessive in calories, fat, and sodium.

Corrective Action:

1. Remove the self-serve condiments such as soy sauce and salt shakers. By July 1, 2017, SFAs must be in compliance with

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Target 2 sodium requirements.

2. All condiment usage must be documented on the production records. Assure HCNP all condiment usage is documented on the production records.

Suggestion: For condiments such as salad dressing and ketchup, have food service staff serve the appropriate portion size or use packets for better portion control.

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

Finding 9000: Meal Components and Quantities - fruit component

The fruit component was not served at breakfast on 12/13/2016 and was replaced by a starchy vegetable. This is an unacceptable substitution and is considered a nonreimbursable meal.

All breakfast meals claimed on 12/13/2016 will be disallowed.

Corrective Action:

- 1.Explain to HCNP what constitutes as a suitable substitution for the fruit component.
- 2.Submit to HCNP a corrected version of the menu served on 12/13/2016 to show that all required components will be served.

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

Finding 9000: Meal Components and Quantities - Production records

Production records were incomplete or incorrectly completed:

Items were credited incorrectly. Example: 1 slice of cheese was listed as 0.5 oz. equivalent meat/meat alternate but the label indicates 1 slice provides 0.25 oz. equivalent.

The number of pans of rice prepared was documented instead of pounds or cups of rice. Documenting the number of pans is inconclusive information.

Vegetables were not listed out correctly. Example: Production record states a tossed salad is served on 12/5/16. The tossed salad should list each individual vegetable and the portion size of each one.

Total amount prepared does not always match up with the portion size served. Example: On 12/16/16, the production record states 27 pounds of egg noodles were prepared. This is only enough for 170 - 1 ½ cup portions of pasta. The production record indicates 170 - 2 ½ cup portions were served.

Serving utensils listed on the production records do not support the serving size indicated. Example:

Salad and edamame are served with tongs. Tongs do not provide a standard measurement.

Menu substitutions were not documented on the production records. Example: Mixed fruit was served instead of a banana on 1/27/17.

Condiment usage, needed amount, amount prepared, initials of staff taking food temperatures, and leftover portions must all be filled out daily.

SFA selected "No" to participating in Offer vs Serve (OVS) on the production records. SFA is participating in OVS. Mark "Yes" in the box at the top of the production record.

Corrective Action:

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

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

Program Year 2017**Finding 9000: Meal Components and Quantities - The meal pattern requirements are not being met for lunch for grades K-8 and 9-12.**

The meal pattern requirements are not being met for lunch for grades K-8 and 9-12. The same menu and portion sizes are being served to all grades K-12. The SFA must have at least two separate menus for grades K-8 and grades 9-12. This is necessary to be in compliance with the dietary specifications for calories, fat, and sodium for each grade group.

Grades K-8 lunch menu for the week of 12/5-9/2016:

- The weekly vegetable subgroup requirements were not met. The menu was short ½ cup of red/orange vegetables and ¼ cup of starchy vegetables.

Grades 9-12 lunch menu for the week of 12/5-9/2016:

- The daily and weekly fruit requirements were not met. The menu was short ½ cup of fruit on Monday, Wednesday, Thursday, and Friday.
- The daily and weekly vegetable requirements were not met. The menu was short ¼ cup vegetables on Monday, Tuesday, Wednesday, and Thursday.
- The weekly vegetable subgroup requirements were not met. The menu was short 1 cup of red/orange vegetables and ¼ cup starchy vegetables.
- The daily meat/meat alternate requirement was not met. The menu was short 1 ounce equivalent of meat/meat alternate on 12/9/2016.
- The daily and weekly grain requirements were not met. The menu was short 1 ounce equivalent of grain on 12/5/2016 and 12/6/2016. The menu was also short ½ ounce equivalent of grain on 12/8/2016.

Grades K-8 lunch menu for the week of 12/12-16/2016:

- The daily and weekly grain requirements were not met. The menu was short on grains on 12/16/2016 and overall for the week.

Grades 9-12 lunch menu for the week of 12/12-16/2016:

- The daily and weekly fruit requirements were not met. The menu was short ½ cup of fruit every day.
- The daily and weekly vegetable requirements were not met. The menu was short ¼ cup of vegetables on Monday, Tuesday, Wednesday, and Friday.
- The vegetable subgroup requirements were not met. The menu was short ½ cup of red/orange vegetables.
- The daily and weekly grain requirement was not met. The menu was short 5 ounces of grains for the week.

Corrective Action:

1. Correct the lunch cycle menu to meet the meal pattern requirements for the different grade groups. Use the HCNP Menu Planning Template (located at <http://hcnp.hawaii.gov/overview/nspl/> - click on the New Meal Pattern tab).
2. Input each week of the corrected cycle menu into USDA's Certification of Compliance Worksheet (located at <https://www.fns.usda.gov/school-meals/certification-compliance-worksheets-5-day-schedule>) to show that the menu meets the meal pattern requirements.
3. Submit product information for processed items to confirm the amounts listed on the cycle menu (food labels, CN labels, product specifications, etc.)
4. Submit the updated menus, the completed HCNP Menu Planning Template for each week of the cycle menu, and all completed USDA worksheets to HCNP.

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

Finding 9000: Meal Components and Quantities - whole grain requirement

The whole grain requirement is not being met. All grains must be whole grain rich. The following grains are either not whole grain-rich or product information was not submitted as requested:

- English Muffin
- Waffle
- Pancake
- Bagel
- Saimin Noodles

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Not meeting the whole grain rich requirement is a repeat finding. This was identified in the Administrative Review conducted in SY 2013-14.

Fiscal action will be taken on one day during the week of 12/5-12/9/2016 for the repeat finding of not meeting the whole grain rich requirement.

Corrective Action:

1. Submit to HCNP adequate documentation (labels, ingredient list, nutrition facts) that shows all grains served are whole grain rich. This includes items that are breaded/battered.
2. If all grains are not whole grain rich, the whole grain exemption form must be completed and submitted to HCNP for approval. The form can be found at <https://hcnp.hawaii.gov/wp-content/uploads/2016/09/Exemption-Request-Re-Use-of-Whole-Grain-Rich-products-SY16-17.pdf>.

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

Finding 9000: Offer Vs. Serve (OVS)

The SFA is not implementing OVS properly at breakfast or lunch. Students were given a choice to decline milk; however, the vendor served the students all other food components. The meal clerk and food service staff did not appear to have been trained on the OVS requirements.

Corrective Action:

1. Explain to HCNP how the SFA will correctly implement OVS during the breakfast and lunch meal service.
2. Provide OVS training to all meal clerks and food service staff (including substitute meal clerks). Refer to <http://hcnp.hawaii.gov/training-resources/> - click on NSLP>Offer VS Serve PowerPoint.
3. Submit to HCNP documentation of the training (sign-in sheet, date of training, agenda, and any handout materials provided to staff).

General Program Compliance - University Laboratory School (543-PCS)

1403. Food safety plan - written, copy available?

Finding 9000: Food Safety - The SFA's Food Safety Plan is incomplete

The SFA's Food Safety Plan is incomplete. The standard operating procedures (SOP) have not been reviewed or implemented and there is no training documentation.

Corrective Action:

1. The SOPs are located on the Hawaii Child Nutrition Program's website at <http://hcnp.hawaii.gov/overview/nslp/> - click on the Food Safety Program tab.
2. Complete SFA's Food Safety Plan; review, sign, and date the SOPs. Implement the food safety plan.
3. Create and maintain a food safety training log.
4. Submit to HCNP a copy of the Food Safety Plan.
5. Assure HCNP that the food safety plan will be renewed annually and that the appropriate staff will be trained and documented annually.

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

Finding 9000: Food Safety - Sanitation inspection was not posted in a publicly visible location.

Sanitation inspection was not posted in a publicly visible location.

Corrective Action:

Sanitation inspection was posted in a publicly visible location during Administrative Review on 1/27/2017. No further action required.