



SNP Administrative Review Findings
Program Year 2018

Malama Honua Public Charter School (1442-7)

Malama Honua Public Charter School (1442-7)
41-054 Ehukai Street
Waimanalo, HI 96795

Food Service Contact
Office Manager
(808) 259-5522
FSMC: Hale Kealoha

Executive Contact
School Director
(808) 259-5522

No. of Sites / Reviewed: 1 / 1
Month of Review: October 2017

Certification and Benefit Issuance - Malama Honua Public Charter School (1442-7)

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

Finding 9017: The application approval process is not implemented correctly.

Issue: Based on the selected students, eligibility determination errors were found, as listed on the SFA-1.

1. Two applications were approved but were incomplete. One application was missing a SSN (last four digits) and the other application was missing the adult signature.
2. One application was not approved correctly. The application was approved as reduced price but should have been paid.

Corrective Action:

1. Obtain the adult signature and last four digits of SSN for the two applications that are incomplete. This was corrected during the on-site review.
2. For the application that should be paid, not reduced price, submit a copy of the letter sent to the household notifying them of the change in benefit. Also, submit a copy of the meal counting roster and Excel spreadsheet that shows the date the status was changed.

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

Finding 9029: The eligibility determination benefit category is not accurately transferred to the benefit issuance document.

Issue: Based on a review of documentation, the following students are not receiving the correct eligibility status:

1. Two students were approved as reduced price but are listed as paid on the meal counting roster.
2. One student is paid but is listed as free on the breakfast meal counting roster.

Corrective Action:

Submit the following documentation for each issue identified above:

1. Copy of the letter sent to the household notifying them of the change in benefit.
2. Copy of the meal counting roster and Excel spreadsheet showing the date the status was changed.

Verification - Malama Honua Public Charter School (1442-7)

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

Finding 9039: Applications not properly selected for verification.

Issues:

1. The applications selected for verification were not appropriately selected. One of the two applications was not error prone.
2. The SFA verified one more application than what was required. The SFA must not verify more than or less than the standard sample size.

Corrective Action:

1. Describe the SFA’s plan/procedures that will be used beginning SY 2018-19 to correct the verification issues listed above.
2. Assure HCNP that error prone applications will be selected from first.



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214. *Student eligibility change due to verification – update Benefits Issuance list?*

Finding 9047: Change in benefit levels due to Verification results not changed within required timelines.

When a student's eligibility status changed due to verification, benefits were not increased within 3 calendar days from the final verification decision.

Corrective Action:

Submit a copy of the meal counting roster and the Excel spreadsheet showing the date the status was changed.

Resource Management Comprehensive Review - Malama Honua Public Charter School (1442-7)

750. *Statement of Revenue and Expenses*

Finding 9000: Annual Financial Report was incorrect

The annual financial report did not correctly display the general funds transfer in to the nonprofit school food service account.

Corrective Action:

Corrected onsite. Corrected and submitted annual financial report.

General Program Compliance - Malama Honua Public Charter School (1442-7)

1212. *Validate OFS #1202 - Were hiring requirements met when hiring new Director?*

Finding 9000: Professional Standards - Director (Food Safety Training)

It is not clear when the current school nutrition program director became the school nutrition program director. The hiring requirements for new directors were effective as of July 1, 2015. The current school nutrition program director has not completed the 8 hours of food safety training which is one of the hiring requirements. The Professional Standards requirements are available at: https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf

Corrective Action:

1. The school nutrition program director must complete the 8 hours of food safety training. A food safety training called "Serving It Safe" is available online via the Institute of Child Nutrition website: <http://www.nfsmi.org/Templates/TemplateDivision.aspx?q=cEIEPTU=>
2. Submit a copy of the certificate demonstrating the training has been completed.
3. Assure HCNP that the SFA will ensure the minimum hiring requirements are met when hiring a new food service director. Assure HCNP that if the candidate does not meet the minimum hiring requirements, the SFA will consult with HCNP for approval of the candidate.

1214. *Validate OFS #1204 - Did the School Nutrition Director meet annual training requirements?*

Finding 9000: Professional Standards - Director (Training Hours)

It cannot be determined if the school nutrition program director met the training hours requirement for SY 17-18. The school nutrition program director is showing a total of 9.5 training hours for SY 17-18. After asking a staff member what the proposed training plan is to complete the remaining 2.5 hours, the staff member stated that the director rolled training hours over from SY 16-17 (SFA stated on Off-site Assessment Tool that the flexibility option is not being used for training hours). When reviewing the director's training log from SY 16-17, it seemed a majority of the hours from SY 16-17 were applied to SY 17-18. The reviewer could not distinguish if the director met her training hours for SY 16-17 and SY 17-18.

Corrective Action:

1. Clearly differentiate on the training logs which training hours are being applied to SY 16-17 and which hours are applied to SY 17-18.
2. Submit the revised training log for SY 16-17 and SY 17-18 for the school nutrition program director.

1217. *Frequency of tracking training hours*

Finding 9000: Professional Standards - Training Documentation



The names of the instructors for the training that occurred on 11/8/17 were not included on the agenda/sign in sheet.

Corrective Action:

This was corrected during the review. No further action required.

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

Finding 9000: Food Safety Plan (SFA) *Repeat Finding

The SFA's food safety plan is incomplete. The following issues were found:

1. All Standard Operating Procedures (SOPs) were included in the food safety plan rather than the SOPs specific to the SFA. Also, the SOPs were not signed.
2. An old version of the food safety plan (October 2015) was still included in the food safety program binder.
3. On page 3, the type of site should include self-prep for breakfast and the number of staff should match the SFA's professional standards records.
4. For the Process 1 chart, the SFA should include breakfast items.

Corrective Action:

1. Complete the SFA's food safety plan. Include the SOPs that are specific to your operation. Provide the date when the food safety plan has been completed. This includes correcting page 3 of the food safety plan, completing the Process 1 chart, and reviewing, signing, and dating all of the SOPs in the food safety plan.
2. Remove all outdated documents from the food safety program binder and file in a separate folder for recordkeeping.
3. Assure HCNP that the food safety plan will be reviewed annually and all appropriate staff will be trained and documented annually.

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

Finding 9000: Food Safety Plan (Vendor)

The vendor's food safety plan is incomplete. The following issues were found:

1. The HCNP template was printed but not completed. Process 1, 2, and 3 charts and assigned duties were not completed.
2. SOPs were not included in the food safety plan.

Corrective Action:

1. Complete the vendor's food safety plan. Provide the date when the food safety plan has been completed. This includes completing the food safety plan template (Process 1, 2, and 3 charts and assigned duties) and that the SOPs have been reviewed, signed, and dated.
2. Assure HCNP that the food safety plan will be reviewed annually and all appropriate staff will be trained and documented annually.

Technical Assistance:

TA provided on how to complete plan and where to find SOPs on HCNP website.



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Malama Honua (550-PCS)

41-054 Ehukai Street
Waimanalo, HI 96795

Food Service Contact

Office Assistant
(808) 259-5522

Month of Review: October 2017

Date of Onsite Review: November 20, 2017

Other Federal Programs - Malama Honua (550-PCS)

4. *Validate snack counts – snacks properly counted and claimed? Enter data.*

Finding 9221: Snacks are not being properly counted and claimed.

Meal counts are transferred from a roster to an Excel spreadsheet. Although the total snack meal counts were correct for October 2017, the transferring of data was not correct (wrong students were indicated as having received a reimbursable snack).

For the day of review, the SFA did not total the meal counts correctly. Initially, the SFA's count was 23 snacks, but a total of 24 snacks were served. The SFA reviewed the meal counting documentation and reported 24 snacks were served.

Corrective Action:

Submit to HCNP the SFA's written meal counting and claiming procedures. Include internal controls for double checking meal counts prior to submitting a claim.

9. *On-site observation – snacks properly prepared, held served and stored?*

Finding 9000: Afterschool Snack Program - Food Safety

Snacks were not served in a sanitary manner. The snacks were served directly in the students' hands (the gloves of the food service staff touched the students' hands which poses a risk of cross contamination).

Corrective Action:

Describe how this issue was corrected and provide the date this was corrected.

Technical Assistance:

Suggested snacks be served in plates or bowls.

1910. *FFVP: Meal service follow HACCP principles, sanitation standards?*

Finding 9000: Food Safety - Flies

Flies were observed entering the kitchen through an open door while staff were setting up the lunches on the serving cart.

Corrective Action:

Describe how this issue was corrected to prevent flies from entering the kitchen.

Meal Counting & Claiming - Malama Honua (550-PCS)

320. *DOR - meal counts combined and recorded correctly? Enter Data.*

Finding 9068: Meal count totals by category not combined and recorded correctly.

As observed on the Day of Review, meal count totals by category obtained from each point of service are not combined accurately for the total meal count by category for the school for breakfast, lunch, and afterschool snack. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed. After the SFA was informed that the day of review meal counts for breakfast, lunch, and snack were not correct, the SFA reviewed the meal counting documentation and was able to total the meal counts correctly.

Corrective Action:



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1. Revise the SFA's current meal counting and claiming procedures. Include internal controls for double checking meal counts prior to submitting the claim for reimbursement.
2. Submit to HCNP the SFA's written meal counting and claiming procedures.

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. *Repeat Finding

The SFA's claim 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. For October 2017, the SFA overclaimed 25 free lunches, overclaimed 4 reduced price lunches, and underclaimed 27 paid lunches. The SFA also underclaimed 2 free breakfasts, overclaimed 1 reduced price breakfast, and underclaimed 2 paid breakfasts.

The SFA is doing meal counting manually on a checklist. The meal counts are transferred into an Excel workbook at the end of each month.

The following issues were identified with the SFA's current meal counting system:

- Meal counts are not transferred correctly into the Excel workbook.
- Formulas in the Excel workbook are incorrect resulting in meal counting errors since the spreadsheet is not adding the meal counts correctly by eligibility status.
- The eligibility status is not correct on all of the meal counting rosters.

Corrective Action:

1. Revise the SFA's current meal counting and claiming procedures. Include internal controls for double checking meal counts prior to submitting the claim for reimbursement.
2. Submit to HCNP the SFA's written meal counting and claiming procedures.

Meal Components & Quantities - Malama Honua (550-PCS)

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

Finding 9000: Meal Components and Quantities (Day of Review)

Prior to the breakfast meal service, it was observed that a 1 oz. spoodle (1/8 cup) of granola was being plated. This portion is less than the 1/4 cup portion that needs to be served to meet the 1 oz. eq. of grain. One student was served Life cereal instead of granola because the child cannot have any nuts. The staff plated a 1/8 cup portion but it should have been a 1 cup portion for a 1 oz. eq. of grain. Staff corrected the issues after being informed that the wrong portion was being plated.

Corrective Action:

Describe how both issues identified above have been corrected so that staff are serving the correct portion size to meet the meal pattern requirements.

Technical Assistance:

TA was provided on the measurements of spoodles. List the spoodle size on the production record under the Serving Utensil column.

Suggest having a cheat sheet listing the different cereals served and the portion size for each cereal that equals a 1 oz eq of grain.

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

Finding 9000: Menu

The lunch menu does not list milk as part of the reimbursable meal. All menu items must be listed on the menu to identify what constitutes a reimbursable meal.

Corrective Action:



Submit the lunch menu for January showing all of the menu items are listed that make up a reimbursable meal.

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, the breakfast menu explaining what constitutes a reimbursable meal is not visible near or at the beginning of the meal service line(s).

Corrective Action:

1. Move the breakfast menu to a location that is visible to the students at or near the beginning of the serving line.
2. Describe where the menu has been posted and the date it was completed.

Technical Assistance:

The school was provided technical assistance during the on-site visit on suggestions on where the menu could be posted.

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

Finding 9000: Meal Components and Quantities (Review Period)

The meal pattern requirements were not met for lunch for the week of 10/16-10/21/17.

1. The weekly red/orange requirement was not met (short 1/4 cup).
2. The whole grain-rich requirement was not met. It cannot be determined at this time if the whole grain-rich requirement was met – more information is needed to determine whether the sandwich thins meet the whole grain-rich requirement. The sandwich thins contain non-creditable grains (wheat bran, cultured wheat starch, and wheat starch).

The review period was expanded to the rest of October. It could not be determined whether the meal pattern requirements were met based on the documentation that was submitted.

For the week of 10/2-10/6/17:

1. 10/5/17: unable to determine how much meat was served for the Beef Hawaiian Stew
2. 10/4-10/5/17: unable to determine how much vegetables were served each day.

For the week of 10/23-10/27/17:

1. Unable to determine if the whole grain-rich requirement was met (tortilla chips).

Note: In order to credit tofu as a meat/meat alternate, the product must meet the requirements specified in the USDA memo, SP 53-2016, which is available at: https://fns-prod.azureedge.net/sites/default/files/cn/SP53_CACFP21_2016os.pdf

Corrective Action:

1. Review all weeks of the cycle menu for lunch.
2. Revise the weeks that do not meet the meal pattern requirements.
3. Submit the revised weeks that were used for the week of 10/2-10/6/17, 10/16-10/21/17, and 10/23-10/27/17. Submit the revised Menu Planning Template and revised USDA Certification Worksheet for each week demonstrating the meal pattern requirements are met.
4. For the sandwich thins, contact the manufacturer for a Product Formulation Statement to demonstrate the product meets USDA's whole grain-rich criteria for the National School Lunch Program. If not, find a different product to serve that meets the whole grain-rich requirement. Submit the Product Formulation Statement for the sandwich thins or the label (nutrition facts and ingredient list) for the new product that will be served.
5. Submit the label for the tortilla chips (nutrition facts and ingredient list).
6. Assure HCNP that all weeks of the cycle menu have been reviewed and revised to meet the meal pattern requirements.

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

Finding 9000: Production Records

Production records are incomplete and not being completed correctly.

Breakfast and Snack: Document the serving size amount in the "Serving Size" column. Document the creditable amount (oz.



or cup equivalent) in the "Creditable Amount" column. For example, for the cheese that was served as part of snack on 11/20/17, list 4 pieces under "Serving Size" and 1 oz eq. under "Creditable Amount." Examples of other items that need to be updated are crackers, cereal, and granola.

Lunch: The time, temperature, and initials are not listed for rice. The "Total Amount Prepared" column is not being completed. Milk temperatures are not being recorded. The type of lettuce prepared is not consistently specified.

Corrective Action:

Submit completed production records for one week for breakfast, lunch, and snack. Remember to:

- Document all food items, portion sizes, and credited amounts served.
- Complete all sections of the production record for each meal service (breakfast and lunch) daily. Complete the "Planning Section" ahead of time and then complete the "Day of Service" section the day of the meal service. It is suggested that the "Planning Section" be typed and used as a template.

Technical Assistance:

TA was provided to school staff to take the temperature of the milk prior to service and document it on the delivery receipt.

Explained how to read the Nutrition Facts Label to determine how much graham crackers to serve to provide 1 oz. eq.

Explained that when purchasing a block of cheese, the pieces/slices need to be weighed to ensure it is a 1 oz. portion. SFA has decided to purchase pre-cut/pre-sliced cheese.

TA provided on completing the production record with the SFA and vendor.

Document the vegetarian meal on the production record and delivery receipt.

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

Finding 9000: Recipes

The vendor mentioned that some amounts on the recipes and production records are listed as the cooked weight (meat) or edible portion weight (vegetables) as opposed to the raw or as purchased weight. This affects the crediting information.

Corrective Action:

1. Review and revise all recipes and production record templates to ensure the information on the recipe is accurate and that the recipe provides the amount that is being credited towards the meal pattern. Please specify on the recipe and production record when the pounds of meat represent the cooked weight and when the pounds of vegetables/fruit on the on the recipe and production record represent the edible portion weight (product has been cleaned). Typically, the raw or as purchased weight is listed on the recipe and production record. For example, if 10 pounds of ground beef are used, 10 pounds would be listed instead of the cooked weight.
2. Submit to HCNP the revised recipes for the one week of completed lunch production records that is being submitted for corrective action.

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. *Repeat Finding

Issue: As observed on the Day of Review, one or more cashiers did not demonstrate a clear understanding of Offer vs Serve (OVS) and its requirements. It appeared at both serving locations that fruit was not optional for the students. Since the fruit was packed separately (not plated in the unitized, pre-packaged meal), the students should have had an option to accept or decline the fruit under OVS.

Corrective Action:

1. Describe how OVS will be implemented at both serving locations.
2. Train all appropriate staff on the OVS requirements to ensure proper procedures are being followed.
3. Submit training documentation (sign-in sheet, agenda, date of training).

Technical Assistance:

The school was provided technical assistance during the on-site visit. Explained that the orange slices at the lunch meal



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service should be treated like the milk in that the students have the option to choose or decline it under Offer vs. Serve.

General Program Compliance - Malama Honua (550-PCS)

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. The poster is posted on the kitchen door. During lunch service, the door was closed so the poster was visible. However, during breakfast and afterschool snack service, the door was not closed so the poster was not visible.

Corrective Action:

1. Post the poster in a prominent location and visible to students during the meal service.
2. Describe where the poster is posted and the date this was corrected.

901. *On-site monitoring review completed prior to February 1?*

Finding 9000: SFA On-site Monitoring

The last on-site review that was completed was on February 7, 2017 (after February 1). The SFA stated that they plan on completing the review in December at both points of service.

Corrective Action:

Submit to HCNP a copy of the completed MC-7 form for SY 17-18.

1408. *Temperature logs available?*

Finding 9000: Food Safety - Temperature Logs

The SFA is maintaining temperature logs. However, the temperatures for the chest freezer are not being recorded correctly. Temperatures were in the -30s and -40s. Provided TA to staff on reading the °F side of the thermometer vs the °C side.

Corrective Action:

Submit completed equipment temperature logs for January demonstrating the correct side of the thermometer is being read and recorded.

1409. *Storage violations observed, on-site, off-site?*

Finding 9000: Food Safety - Dishes

During breakfast service, students walked into the kitchen with their dirty dishes in the same area where staff were still serving breakfast. This is a safety concern.

Suggestion: have a bin out on a table labeled "dirty dishes" for students to place their dishes in after they are finished eating.

Corrective Action:

Describe how this issue was corrected. Provide the date this issue was corrected.

1409. *Storage violations observed, on-site, off-site?*

Finding 9150: Storage violations were observed.

The following issues were found at the vendor:

- There were items in refrigerator that were not labeled & dated.
- Tortilla chips were in a box on the floor.

Corrective Action:

Assure HCNP all products are clearly labeled and dated and that all products are stored 6 inches off the floor.

