



SNP Administrative Review Findings

Child & Family Service RCCI (1401-0)

Program Year 2018

Child & Family Service RCCI (1401-0)

91-1841 Fort Weaver Road
Ewa Beach, HI 96706

Food Service Contact

Consultant Dietician
(808) 521-8647

Executive Contact

Director of Oahu Programs
(808) 681-1586

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

Resource Management Comprehensive Review - Child & Family Service RCCI (1401-0)

755. Allowable expenses

Finding 9117: Unallowable general expenses charged to the nonprofit school food service account.

Based on the SFA's accounting records for the most recently completed fiscal year, general expenses charged to the nonprofit school foodservice account were not reasonable, necessary and/or allocable. Unallowable expenses include the following:

- 1) DG choc 1pc (chocolate milk must be fat-free)
2) CKNFRIEDRIC (dinner)
3) BUTRFLYSHRI (dinner)
4) TERIYAKICHK (dinner)
5) MC CKN PIE (dinner)
6) FISHSTICKS3 (does not meal pattern requirements)
7) CHICK WING (dinner)
8) SWC FC HBBQ (dinner)
9) PORTABELLA (dinner)
10) STEAK CHEES (dinner)
11) CORN COB (dinner)
12) MELONA8CNT
13) COOKIES FUN
14) CRACKERS GO
15) COOKIES GRA
16) CHIPS POTAT
17) CRACKERS OR
18) CHEX MIX
19) TOSITIOS SCP PARTYPC
20) SILK ALMOND
21) COCOFUSION
22) TENDERLOIN (dinner)

Corrective Action:

FFY 2018 Found unallowable expenses charged to Account 5114. Remove these unallowable expenses from Account 5114. Once completed, send a copy of the updated General Ledger to HCNP.

General Program Compliance - Child & Family Service RCCI (1401-0)

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

Finding 9000: Civil Rights

The Civil Rights Ethnic Data Report and the Complaint Log for the current school year were not completed.

SFA did not have a copy of the non-discrimination statement, Justice For All poster, and FNS-113 instructions in civil rights binder.



Program Year 2018

**Corrective Action:**

The SFA corrected all findings during the on-site review. No further corrective action required.

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

**Finding 9000: Local Wellness Policy (LWP)**

SFA did not have a LWP. Starting June 30, 2017, all SFAs were required to have a written wellness policy implemented.

**Corrective Action:**

1. Create and implement a Local Wellness Policy. For guidance on creating a LWP, please refer to [https://fnsprod.azureedge.net/sites/default/files/tn/LWPsummary\\_finalrule.pdf](https://fnsprod.azureedge.net/sites/default/files/tn/LWPsummary_finalrule.pdf).
2. Submit to HCNP a copy of the LWP.

1217. Frequency of tracking training hours

**Finding 9000: Professional Standards**

SFA is not maintaining a log of training hours for each individual staff member. Food service director was provided HCNP's training tracker template during on-site review. Food service director was able to complete a few of the logs while reviewers were on-site.

Reviewers noted that 2 staff members did not have a training log. Based on information provided, one of the two staff members has yet to receive the required training hours.

One school nutrition staff has no record of training. This employee may count hours from HCNP trainings and time spent training staff towards her training requirements.

It was observed that training sign-in sheets kept on file do not include the specific date the training was held on. All training documentation must include the date the training was conducted.

Food service director did not meet the hiring standards upon hiring. New school nutrition program directors that begin duties after July 1, 2015 must meet the new hiring standards set forth by USDA - [https://fnsprod.azureedge.net/sites/default/files/cn/profstandards\\_flyer.pdf](https://fnsprod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf). SFA must seek prior approval from HCNP before hiring an individual that does not meet the minimum hiring standards.

**Corrective Action:**

1. Submit a copy of the training log for each meal program staff member.
2. For staff that has yet to complete required training hours, submit a training plan that shows how each staff member plans to obtain required training hours by the end of SY 2017-18.
3. Food service director must obtain the required 8 hours of food safety training. The Institute of Child Nutrition provides an online food safety course called "Serving It Safe". Complete the course and submit to HCNP the certification of completion.
4. Assure HCNP that the SFA will seek prior approval before hiring a new food service director that does not meet the requirements.

1501. Records retained for 3 years?

**Finding 9000: Recordkeeping**

Records are not maintained for at least three years plus the current year. The SFA is missing production records for days during the review period (November), missing original meal counting documentation for May, June, and September 2017, missing civil rights complaint log, Ethnic Data Report, and civil rights training documentation for previous years, and discarded the last food safety inspection.

**Corrective Action:**

Assure HCNP that the SFA will maintain meal program related documents for the required three years plus the current school year.





**SNP Administrative Review Findings**

**Child & Family Service RCCI (1401-0)**

*Program Year 2018*

**Child & Family Service RCC (902-RCC) Food Service Contact**

91-1841 Fort Weaver Road  
Ewa Beach, HI 96706

Consultant Dietician  
(808) 521-8647

Month of Review: November 2017

Date of Onsite Review: December 20, 2017

**Meal Counting & Claiming - Child & Family Service RCC (902-RCC)**

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

**Finding 9000: Meal Counting and Claiming**

Meal counting is conducted both at the point-of-service (POS) and at the end of each month on the computer. There are discrepancies between the POS count and the monthly meal count. A student may be marked absent on a given day on the POS count but included on that day in the monthly meal count (and vice versa).

For example, for breakfast on November 9, 2017, the POS count indicated 2 meals were served; however, the monthly count claimed 3 meals were served. A total of 4 breakfast meals were incorrectly claimed during the month of November (11/8, 11/9, 11/10, 11/18). This resulted in an over claim of 2 meals. A total of 2 lunch meals were incorrectly claimed during the month of November (11/9, 11/10). This resulted in an over claim of 1 meal.

Fiscal action will occur for the meals that were over claimed.

**Corrective Action:**

1. Train all meal counting staff on the proper meal counting and claiming procedures. Submit to HCNP the training agenda, sign-in sheet, and any materials used. Training materials may be located on the HCNP website at <http://hcnp.hawaii.gov/training-resources/>.
2. Explain to HCNP how the SFA intends to conduct meal counting in a way that provides clear and accurate meal counts.
3. Submit one week of meal counts to HCNP for review.

**Technical Assistance:**

POS counts should always clearly indicate how many reimbursable meals were served. If an error is made, it should be clearly crossed out with the staff member's initials and the date with the correct information inputted.

**Meal Components & Quantities - Child & Family Service RCC (902-RCC)**

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

**Finding 9000: Meal Components and Quantities - Day of Review**

Staff stated that Kraft American cheese is served on sandwiches. This is a repeat finding. Kraft American cheese is not a creditable food item.

**Corrective Action:**

Purchase a credible cheese in place of the Kraft American cheese. Submit the label of the product that will be used moving forward.

*403. DOR - two varieties of milk available, allowable substitutions? Enter data.*

**Finding 9000: Meal Components and Quantities - Day of Review**

One participant is lactose intolerant and receives Lactaid milk. Lactaid milk is compliant with the meal pattern requirements as long as it is nonfat or 1%. It was observed that the participant was served Lactaid 2%. The participant must have a medical statement on file stating that they need Lactaid 2% in order for meals to be considered reimbursable.

**Corrective Action:**



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Submit to HCNP a medical statement for the participant showing the need for 2% Lactaid milk. If 2% is not required, assure HCNP that nonfat or 1% Lactaid milk is provided to the participant.

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

**Finding 9000: Resource Management**

SFA did not separate program and non-program purchases. Several items that are served either at dinner meal service or snack were found on program receipts.

**Corrective Action:**

- 1.Explain to HCNP how the SFA plans to keep program vs. non-program purchases separate.
- 2.Submit a week of program receipts to HCNP for review.

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

**Finding 9000: Meal Components and Quantities - Review Period**

SFA does not always serve what is on the cycle menu. Food service director frequently substitutes food items based on various reasons (cannot find in grocery store, participants do not like it, to give variety).

Items on the menu do not always credit the same as the products that are purchased.

Production records are completed after the meal service. Completing the production records after the meal service does not always provide accurate information. For lunch on 12/20/17, none of the participants took milk, yet the production record showed that three milks were served.

Production records are not completed properly. Based on labels, food items are not credited correctly. The same temperatures are documented for most food items. This looks as if temperatures are not really being taken. While on-site, reviewers observed staff only taking the temperature of the chicken. SFA must take and document temperatures of all hot and cold foods/beverages. If the temperature was not taken for an item, the SFA must not make up a temperature.

**Corrective Action:**

- 1.Explain to HCNP how the SFA and menu planner will communicate and serve meals that credit as the menu intends.
- 2.Train meal program staff on crediting menu items. Submit to HCNP the training agenda, sign-in sheet, and any training materials used. Training materials may be found at <http://hcnp.hawaii.gov/training-resources/>.
- 3.Train meal program staff on the proper completion of production records. Submit to HCNP the training agenda, sign-in sheet, and any training materials use. Training material can be located on the HCNP website at <http://hcnp.hawaii.gov/training-resources/>.
- 4.Create production record templates for each day of the cycle menu and have the cook complete the 'day-of-review' information during meal production and immediately following the meal service each day.
- 5.Submit to HCNP two weeks of menus with corresponding production records and product labels.

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

**Finding 9000: Meal Components and Quantities - Review Period**

The following issues were noted during the review period (November 2017):

The whole grain rich requirement is not met. This is a repeat finding. The following items are not whole grain rich: bagel, English muffin, Oroweat double fiber bread, waffles, pancake mix, cream of wheat, Tyson breaded chicken strips, fish sticks

**Breakfast:**

- Week 2 of the breakfast cycle menu (served 11/13/17-11/19/2017) exceeds the grain requirement of 12.5-14 ounce equivalents. The menu is currently at 29.75 ounce equivalents. This is excessive. SFA will need to either reduce the amount of grains on the menu or allow the residents to take only one of the two entrée options.



Lunch:

•On 11/4/17, 11/18/17, 11/24/17 the menu was short on meat. SFA must serve a larger portion of deli ham since water is added to the product. Handout given during the on-site review to assist SFA in calculating needed amount of deli meats.

Reviewer is unable to determine if the meal pattern was met for the remaining weeks of cycle menu due to missing production records.

16 production records in November 2017 for the breakfast meal service were not completed and kept on file (11/1-3, 6-9, 20-24, 27-30). 16 production records in November 2017 for lunch meal service were not completed and kept on file (11/1-3, 6-9, 20-24, 27-30). Reviewers checked food receipts for the month of November 2017 to see if enough food was purchased to serve reimbursable meals. It could not be determined if enough food was purchased to serve the planned menu. 41 breakfast meals and 47 lunch meals will be disallowed.

**Corrective Action:**

1. Replace the above grain products with a comparable product that is whole grain rich. If SFA is unable to purchase a whole grain rich equivalent, SFA must complete and submit a whole grain rich exemption form for the products that cannot be found in a whole grain version. Form can be located on the HCNP website.
2. Explain to HCNP how the SFA will reduce the amount of grains for week 2 of the breakfast cycle menu. Submit to HCNP the updated menu showing how the amount of grains was reduced.
3. Submit a production record template showing the serving size and creditable amount of deli ham on a day in which a deli sandwich is served.
4. Assure HCNP that production records will be completed for every breakfast and lunch meal service.

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

**Finding 9000: Offer Versus Serve (OVS)**

OVS is not implemented correctly at breakfast. Participants are allowed to take all food items for breakfast. This results in the cycle menu exceeding the grain requirement.

**Corrective Action:**

1. Explain to HCNP if the SFA will continue to implement OVS for breakfast or switch to a Serve All service. Include in the explanation how the breakfast meals service will be set up.
2. If SFA continues to participate in OVS for the breakfast meal service, training meal program staff on the proper implementation of OVS. Submit training agenda, sign-in sheet, and any training materials used. Training materials can be found on <http://hcnp.hawaii.gov/training-resources/>.

**General Program Compliance - Child & Family Service RCC (902-RCC)**

1404. Food safety plan - written, copy available?

**Finding 9000: Food Safety**

The Food Safety Plan is not complete. This is a repeat finding. The Process #1, 2, and 3 charts have not been completed. The plan does not contain any Standard Operating Procedures (SOPs).

**Corrective Action:**

1. Complete the food safety plan. Include in the plan standard operating procedures. SOP templates can be located at <http://hcnp.hawaii.gov/overview/nslp/> > Food Safety.
2. Submit the completed food safety plan to HCNP for review.
3. Train meal program staff on the SOPs. Include training on proper hand washing procedures. Submit to HCNP the training sign-in sheet.
4. Assure HCNP that the training sign-in sheet will be kept in the food safety binder for the required 3 years plus the current school year.
5. Explain to HCNP who will be responsible for reviewing/updating the food safety plan and SOPs annually.



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

**Finding 9000: Food Safety**

The following issues were observed related to food safety:

Eggs are stored on the top shelf in the refrigerator above produce.

Bag of sugar was left open in the pantry.

Leftover rice from breakfast had not been put in the refrigerator by the time reviewers started to observe lunch preparation.

The full-size freezer has excessive frost.

Temperature gauges that are kept in the door of the equipment read higher than they should have.

Staff did not wash hands between glove changes.

**Corrective Action:**

1. Move thermometers to a shelf in the main part of the refrigerator/freezer. Assure HCNP that this was done.

2. Submit a photo of each the pantry, freezer, and refrigerator to show that foods are stored properly.