



**SNP Administrative Review Findings**

**Na Wai Ola PCS (2412-1)**

*Program Year 2018*

**Na Wai Ola PCS (2412-1)**

18-1355 Volcano Rd.  
Mountain View, HI 96771

**Food Service Contact**

Food Manager  
(808) 315-9453

**Executive Contact**

Principal  
(808) 968-2318

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

**Resource Management Comprehensive Review - Na Wai Ola PCS (2412-1)**

*755. Allowable expenses*

**Finding 9000: Unallowable Expenses-Delinquent fees**

On July 8, 2016, there was a late fee charge to the vendor. By federal regulations, late fees or delinquent charges cannot be charged to the nonprofit school food service account.

**Corrective Action:**

Remove these transactions from the nonprofit school food service account. Once completed, print out the general ledger and submit a copy to HCNP. Then revise the AFR and email it to HCNP.

*755. Allowable expenses*

**Finding 9000: Unallowable Purchases**

Remove these transactions from the nonprofit school food service account. Once completed, print out the general ledger and submit a copy to HCNP. Then revise the AFR and email it to HCNP.

**Corrective Action:**

Remove these transactions from the nonprofit school food service account. Once completed, print out the general ledger and submit a copy to HCNP. Then revise the AFR and email it to HCNP.

**Technical Assistance:**

Provided technical assistance to new business manager about the morning snack. She will remove any morning snack transactions. In 2017-2018 this SFA will participate in the FFVP so the morning snack will not be needed.

*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 SY 2016-2017, general expenses charged to the nonprofit school foodservice account were not reasonable, necessary and/or allocable. Unallowable expenses, purpose of expenditures and amounts:

**Corrective Action:**

Found a charge to the food service account (350) for a school employee and no receipt was provided.

**Technical Assistance:**

Remove this transaction from the account. Once completed, send an updated copy of the general ledger and revise the AFR.

**General Program Compliance - Na Wai Ola PCS (2412-1)**

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

**Finding 9000: Civil Rights - Complaint Form**

The SFA's civil rights binder does not contain the complaint form.

**Corrective Action:**



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1. Include the complaint form in the SFA's civil rights binder. The form is available on HCNP's website: <http://hcnp.hawaii.gov/overview/nslp/> (scroll down and click on "Civil Rights").
2. Assure HCNP this has been completed. Provide the date it was completed.

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

**Finding 9000: Civil Rights - Nondiscrimination Statement**

The incorrect nondiscrimination statement was on the monthly menus for October and November.

**Corrective Action:**

This was corrected during the on-site review on 11/29/17. No further action required.

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

**Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.**

The Local School Wellness Policy does not include all of the requirements. The following elements are missing in the Local Wellness Policy:

- A clearly identified wellness policy leadership responsible for policy compliance
- Permitting participation by the general public and the school community
- Evidence of updates/revisions made to policy - must conduct an assessment of the wellness policy every 3 years, at a minimum
- Updating the public on the wellness policy, including any updates to and about the wellness policy, on an annual basis and the triennial assessment.

**Corrective Action:**

1. Revise the wellness policy to include all of the USDA requirements.
2. Submit a copy of the revised wellness policy.

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

**Finding 9000: Professional Standards - Hiring Requirements for new Directors**

Documentation was not available at the time of the review so reviewers were unable to determine if the school nutrition program director met the hiring requirements.

**Corrective Action:**

Submit to HCNP documentation demonstrating the new school nutrition program director met the hiring standards. If the new school nutrition program director did not meet the hiring requirements, assure HCNP that the SFA will ensure the minimum hiring requirements are met when hiring a new school nutrition program 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.

*1213. Validate OFS #1203 - Did new Director meet food safety certification and training requirements?*

**Finding 9000: Professional Standards - Food Safety Training Requirement**

The school nutrition program director did not meet the 8 hour food safety training requirement that was to have been completed within 30 days of hire.

**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?qs=cEIEPTU=>
2. Submit a copy of the certificate demonstrating the food safety training has been completed.

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



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**Finding 9000: Professional Standards - Tracking Training Hours**

Two school staff included Department of Health food safety training on their log. However, on the training documentation, it indicated that both staff were out sick. The SFA must only list trainings that they completed.

**Corrective Action:**

Assure HCNP that all school nutrition program staff will only document the training hours that have been completed on their training log when demonstrating compliance with the annual training requirements.

*1216. Validate OFS #1206 - Did School Nutrition personnel meet annual training requirements?*

**Finding 9000: Staff not meeting required training requirements**

Two school nutrition staff have not yet obtained the total 4 hours of training required for SY 17-18.

**Corrective Action:**

Submit the training logs for both school nutrition staff demonstrating that they each met the required training hours. If the required training hours have not yet been met, submit a plan on how each employee will meet the required number of hours by the end of the school year.

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

**Finding 9151: SFA does not submit reports as required to the State agency.**

The SFA does not submit reports to the State agency according to reporting and recordkeeping requirements described in 7CFR 210.20. The Annual Financial Report was not submitted by the due date.

**Corrective Action:**

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

*1501. Records retained for 3 years?*

**Finding 9152: SFA not retaining Program records for a minimum of 3 years.**

1. The SFA is not retaining the appropriate records regarding program management for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. Numerous records were not maintained. For the month of September 2017, the SFA does not have any Afterschool Snack Program production records. During the month of September 2017, the SFA does not have breakfast and lunch production records for the following days: 4, 14, 15, 18, 19, 20, 21, 22, 25, 26, 27, 28, 29.

For October 3, 2017, the SFA does not have breakfast production records.

Fiscal action will be taken on all of these meals.

2. Civil rights documentation is not being maintained for at least three years plus the current year. Past civil rights training, complaint logs, and the Civil Rights Ethnic Data Reports were not on file for at least three years plus the current year.

**Corrective Action:**

1. Assure production records will be completed daily for all meals served.

2. Describe to HCNP how the SFA will ensure all program records are maintained for at least three years plus the current year.

**IX Special Provision Options - Na Wai Ola PCS (2412-1)**

*2115. CEP most recent approval – documentation support ISP and claiming percentages?*

**Finding 9182: SFA documentation does not support the Identified Student Percentages and CEP claiming percentages for all of its CEP sites.**

Certification documentation used to determine the ISP that was submitted to the State agency for the latest approval to operate CEP was not validated by the State agency during the review. The SFA submitted an enrollment of 181 for April 3, 2017, but the State agency validated the enrollment was 183 on April 3, 2017 during the onsite review.



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**Corrective Action:**

The SFA must maintain documentation to support the CEP data submitted for approval. This includes maintaining documentation to support the identified students and enrollment for the date specified by HCNP in April. Assure HCNP all appropriate documentation will be maintained annually.



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**Na Wai Ola PCS (398-PCS)**

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**Food Service Contact**

Food Manager  
(808) 315-9453

Month of Review: October 2017

Date of Onsite Review: November 27, 2017

**Other Federal Programs - Na Wai Ola PCS (398-PCS)**

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

**Finding 9000: Afterschool Snack Program (ASP) - Meal Counting**

Meal counting was not done at the point of service. Papaya was served to the students but the milk crate was placed in the middle of the table for the students to help themselves at any time. The service of snacks must be done in an orderly manner to ensure each student has a reimbursable snack and meal counting is done at the point of service. Point of service means the point when each student receives a reimbursable meal.

**Corrective Action:**

Submit to HCNP the SFA's meal counting procedures for the Afterschool Snack Program that ensures that meal counting is done at the point of service.

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. \*Repeat Finding**

ASP review was not completed within the first four weeks of operation. The ASP must be reviewed twice each school year, the first review must be conducted during the first four weeks of operation and the second review must be conducted before the end of school.

**Corrective Action:**

1. Conduct the first review of the ASP.
2. Submit to HCNP a copy of the completed ASP review form.

1700. *ASSP – areas identified requiring TA, CA?*

**Finding 9000: Afterschool Snack Program (ASP) - Attendance**

Attendance was not taken on 11/27/17 and 11/28/17. It is required that attendance be taken daily for the Afterschool Snack Program.

**Corrective Action:**

1. Submit a copy of the ASP attendance for March 2018.
2. Assure HCNP that attendance for the ASP is taken daily.

**Meal Counting & Claiming - Na Wai Ola PCS (398-PCS)**

325. *Review Period meal counts by category correctly used in the claim? Enter data.*

**Finding 9000: Meal Counting and Claiming \*Repeat Finding**

During the month of September 2017, the SFA over claimed meals due to insufficient quantities of milk and missing production records. Production records serve as proof that a reimbursable meal was served. The reviewers could not tell if reimbursable meals were prepared and served on 9/14, 9/15, 9/18, 9/19, 9/21, 9/22, 9/25, 9/26, 9/27, 9/28, 9/29. All meals served on these days are considered nonreimbursable. The SFA also over claimed one meal on the 27th due to inconsistency of symbols on the meal counting sheets. Some meal counting sheets have an "A" for absent students and



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some are left blank. On this particular day, a blank box was counted as a meal.

**Corrective Action:**

1. Assure HCNP that production records will be completed and maintained daily for each meal service. Records must be kept for at least 3 years plus the current year.
2. Describe to HCNP the procedures in place to ensure enough milk is being ordered.
3. Revise the SFA's meal counting and claiming procedures. Describe the symbols that will be used when counting meals and include internal controls for double checking meal counts prior to submitting the claim for reimbursement.
4. Submit to HCNP the SFA's 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.**

The sum of the school's daily meal counts for the review period (October 2017) does not match the State agency's validated meal counts for the school for the review period. The SFA's claim for the school 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 under claimed 1 lunch. The SFA did not have two people double check the meal count totals prior to the claim submission.

**Corrective Action:**

1. Revise the SFA's 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 meal counting and claiming procedures.

**Meal Components & Quantities - Na Wai Ola PCS (398-PCS)**

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

**Finding 9000: Meal Components and Quantities - Portion Sizes**

The following issues were found when meeting with the vendor:

1. Vendor was plating ¼ cup of black beans for lunch instead of ½ cup as indicated on the production record and menu planning template. This would have resulted in the meals being a ¼ cup short of the daily vegetable requirement. The vendor was informed of the issue and corrected it immediately. It was found that the "Assembly Info" document that the serving staff follow stated 1/4 cup which did not match what was listed on the Menu Planning Template or production record.
2. Vendor used a #10 scoop X 2 to serve a 1 cup serving of rice. Two #10 scoops is equal to ¾ cup, not 1 cup. This resulted in the weekly grain requirement not being met. The vendor did not document this correctly on the production record.

**Corrective Action:**

1. Describe to HCNP how each issue above has been corrected. Submit documentation to support the response/explanation.
2. Provide the date each issue was corrected.

**Technical Assistance:**

Reviewed how to determine oz eq for rice. Informed vendor to purchase #8 scoop to serve 1/2 c rice. Use #8 scoop x 2 to serve 1 cup of rice.

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

**Finding 9000: Monthly Menu \*Repeat Finding**

The monthly lunch menu did not include all of the meal components on 11/23/17 and 11/25/17 (missing fruit).

**Corrective Action:**

1. Ensure all of the meal components and menu items that constitute a reimbursable meal are listed on the monthly menu.
2. Submit the monthly lunch menu for April to demonstrate the issue has been corrected.



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

**Finding 9000: Signage**

Menu was not posted at or near the beginning of the meal service line. The menu was posted in the food truck window which could not be easily seen by the students.

**Corrective Action:**

Post the menu at the beginning of food service line. This was corrected during the onsite review on 11/28/17. No further action required.

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 - Preschool**

Preschoolers are served in their classroom at breakfast and lunch but are receiving the same portions as the upper grade levels. The preschool meal pattern requirements must be followed when preschoolers are not co-mingled with the other grades. The granola that is currently used exceeds the sugar limit for the preschool meal pattern.

**Corrective Action:**

1. Revise the breakfast and lunch cycle menus to meet the preschool meal pattern requirements for preschoolers. This includes not using the granola that is currently used because it exceeds the sugar limit. Find an alternate granola product that does not exceed the sugar limit.
2. Submit the revised cycle menu for breakfast and lunch demonstrating the portions were adjusted for the preschool meals. Submit the completed HCNP Menu Planning Templates for each week of the breakfast and lunch cycle menus to show the difference between the preschool portions and the K-6 portions.
3. Submit the label (nutrition facts and ingredient list) for the granola product that is being used that meets the preschool meal pattern.

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

**Finding 9000: Production Records and Delivery Receipts (Vendor)**

1. The vendor's production records were not completed correctly. The number of meals served were recorded in the Total Amount Prepared column instead of the total amount of the food item needed to serve the number of planned meals.
2. The delivery receipts (Event Order Sheet) for the week of review did not contain the portion sizes/credited amounts for the menu items for the SFA to verify upon receipt.

**Corrective Action:**

1. The vendor must document the amount of each food item needed on the production record. The vendor demonstrated this has been corrected during the review of menus for another SFA's AR. The production records submitted by the vendor in January showed the amount of food needed to produce meals for all SFAs, including Na Wai Ola PCS. No further action required.
2. The vendor must document the portion sizes/credited amounts on the delivery receipt/Event Order Sheet. The vendor demonstrated this has been corrected with the Event Order Sheet provided to the SFA on 11/28/17. No further action required.

**Technical Assistance:**

Provided the latest version of the production record to the vendor with the instructions for her to use.

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

**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Meal pattern requirements were not met. Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals served with insufficient portion sizes or insufficient



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quantities of meal components are incomplete and are not reimbursable.

The following issues were found:

#### Breakfast:

- The daily grain requirement was not met on October 23, 24, and 27. The SFA used a #16 disher for oatmeal (1/4 c) and a #8 disher for fried rice (which had egg and ham). This resulted in the weekly grain requirement not being met as well.
- Granola is not whole grain rich. SFA must find another product that meets the whole grain requirement.
- Two breakfast meals in October (10/5/17 and 10/17/17) are non-reimbursable due to the grain component was missing on the production records. These meals are nonreimbursable. Fiscal action will be taken on these meals.

#### Lunch:

- The vendor uses Boca crumbles for lunch. Additional information is needed from the manufacturer to determine how the product credits towards the meal pattern requirements.
- Lunch weekly grain requirement was not met (short 1 oz eq).

#### Corrective Action:

1. Revise the breakfast cycle menu to meet the meal pattern requirements. Document the correct serving utensil to use on the production record. The most current production record template has a "Serving Utensil" column. This is available at: <http://hcnp.hawaii.gov/overview/nslp/> (Click on Program Resources. Then, click on Production Record and Transport Daily Record).
2. Submit the revised Menu Planning Templates, USDA Certification Worksheets, and Production Record templates for each week of the breakfast cycle menu to show that all documents have been updated.
3. Discontinue serving the granola that was served in October. If the SFA chooses to keep granola on the menu, find another granola product that meets the whole grain-rich criteria. Consider finding one that is also acceptable for preschoolers (one that does not exceed the sugar limit). Submit the label (nutrition facts and ingredient list) for the product that is being used.
4. Revise the lunch cycle menu to meet the meal pattern requirements. Submit the revised Menu Planning Templates, USDA Certification Worksheets, and Production Record templates for each week of the lunch cycle menu to show that all of the documents have been updated.
5. Submit labels for the grain items that have not been previously submitted to demonstrate all grain items meet the whole grain-rich criteria, such as bread crumbs for the chicken nuggets. If any grain products are not whole grain-rich and a whole grain-rich equivalent cannot be obtained or is significantly higher in cost, complete the exemption request form.
6. Ask the manufacturer for additional information for the Boca crumbles that were used for lunch that specifies how the product credits towards the meal pattern requirements. In order to credit a product as an Alternate Protein Product (APP), the manufacturer would have to submit specific documentation. There are several APP crediting resources listed on this website: <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry> (under the Helpful Links section). Submit the documentation to HCNP. If the documentation cannot be obtained, describe how the menu was changed to meet the meal pattern requirements.

#### Technical Assistance:

Reviewed meal pattern issues with the SFA. Provided TA to food service staff at the SFA on the scoop sizes and cup measurement equivalents. A copy of the Basics at a Glance chart was provided to post in the food truck. The SFA found the Basics at a Glance poster that they had laminated and will post that.

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

#### Finding 9000: Offer vs Serve - Signage

Offer vs. Serve (OVS) signage was posted in both service areas (main serving area and the preschool classroom). The SFA does not participate in OVS.

#### Corrective Action:

Remove the OVS signage. This was corrected during the onsite review. No further action required.

## General Program Compliance - Na Wai Ola PCS (398-PCS)

811. Justice for All poster displayed in prominent location?





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**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 in the Pre-K classroom where it is visible to recipients of benefits.

**Corrective Action:**

1. Post the USDA "And Justice for All" poster where meals are served in the Pre-K classroom.
2. Describe where it was posted. Provide the date this was completed.

1404. Food safety plan - written, copy available?

**Finding 9000: Food Safety Plan - SFA**

The SFA's food safety plan is incomplete, the previous meal program staff is listed, and Standard Operating Procedures (SOPs) were last reviewed on 9/25/15. Cooking process #3 is not the updated version - the temperature danger zone listed is not correct.

**Corrective Action:**

1. Revise the SFA's food safety plan to include current food service employees and update the temperature danger zone for the cooking process #3 chart. The most current food safety plan template is available at: <http://hcnp.hawaii.gov/overview/nsfp/> (click on Food Safety).
2. Provide the date when the food safety plan has been updated. This includes all SOPs have been reviewed, signed, and dated this school year.
3. Assure HCNP that the food safety plan will be reviewed annually and all appropriate staff will be trained and documented annually.

1404. Food safety plan - written, copy available?

**Finding 9000: Food Safety Plan - Vendor**

The vendor's food safety plan is incomplete. The following are missing: Standard Operating Procedures (SOPs), staff training documentation, and the categorizing of food items into processes 1, 2, and 3.

**Corrective Action:**

1. Complete the food safety plan to include SOPs, staff training documentation, and ensure all food items are categorized into the appropriate process. The food safety plan template and SOPs are available at <http://hcnp.hawaii.gov/overview/nsfp/> (click on Food Safety).
2. Provide the date when the food safety plan has been completed. This includes all SOPs have been reviewed, signed, and dated this school year and staff have been trained.
3. Assure HCNP that the food safety plan will be reviewed annually and all appropriate staff will be trained and documented annually.

1406. 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. \*Repeat Finding**

Most current food safety inspection is not posted - Inspection dated 9/16/16 is posted.

**Corrective Action:**

Remove the 2016 inspection and post the most current one dated 9/1/2017. The SFA corrected this during the on-site review. No further action required.

1408. Temperature logs available?

**Finding 9000: Food Safety - Temperature Log (Vendor)**

Although the vendor had the equipment temperature recorded for 11/27/17, the vendor's records only went back to three days prior to our visit.



**Corrective Action:**

1. Document the temperature of all equipment daily. Record any corrective action taken when the equipment is out of temperature.
2. Submit the temperature log for March 2018 to show that temperatures are being recorded daily.

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

**Finding 9000: Food Safety - SFA**

The following issues were found at the SFA:

1. One of the refrigerators was not clean or organized. A pan of cucumbers was stored diagonally, milk was leaking, an orange slice was found at the bottom, and a screw was inside on the freezer door shelf.
2. On 11/29/17, a case of eggs had been left on the counter in the store room from 11/27/17.
3. Food was not labeled or dated in the refrigerators (bowl of dressing, pan of cucumbers).
4. One container of white milk had milk spillage on the bottom of the plastic container.

**Corrective Action:**

1. Clean and organize the refrigerator.
2. Store cold foods in appropriate storage areas immediately upon receipt.
3. Label and date all food items.
4. Discard the carton(s) of milk that were leaking/opened and clean the plastic container. Store milk in a way so that the weight of the milk in the plastic containers do not cause milk spillage.
5. Assure HCNP all of the above have been corrected.

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

**Finding 9000: Food Safety - Vendor**

The following issues were found at the vendor:

1. The vendor started plating meals shortly after 8:00am on the day of review - the last lunch service at the SFA is from 12:30-1:10pm. This is concerning due to the amount of time the food is in the temperature danger zone from the time it is packed to the time it is eaten. Hot and cold foods are being plated together and containers used to transport meals are not insulated to keep the food hot/cold.
2. Products were stacked too high in the refrigerator.

**Corrective Action:**

1. The SFA must ensure that all of its facilities for the handling, storage, and distribution of foods are properly safeguarded against theft, spoilage, and other loss. The SFA needs to include the requirement of using insulated transport containers (e.g. those suitable for hot/cold foods) in their bid.
2. Describe how each issue noted above has been corrected. Provide the date the issues were corrected.