



SNP Administrative Review Findings

Ke Ana La'ahana PCS (2411-2)

Program Year 2018

Ke Ana La'ahana PCS (2411-2)

162A Baker Ave
Hilo, HI 96720-0997

Food Service Contact

SASA
(808) 961-6228
Vendor: Keaukaha Elem

Executive Contact

PCS Director
(808) 961-6228

No. of Sites / Reviewed: 1 / 1
Month of Review: February 2018

Commendations

- \* Despite using manual meal counting, Month of Review (February) was free of counting and claiming errors.
\* Staff was extremely responsive to our requests for documentation.
\* Documents were well organized and ready for reviewers upon arrival.

Suggestions

- \* Vendor is not using low sodium shoyu. Recommended to School Food Services Branch to use low sodium shoyu as a way to reduce sodium in the meals.

Technical Assistance

- \* TA was provided on the LWP requirements. Provided template for Local Wellness Policy (Alliance for Healthier Generation) as well as a Local Wellness Policy tool that can be used to revise policy annually. Suggested the SFA complete the assessment tool annually at the annual meetings.
\* - Reviewed lunch meal pattern requirements with the Food Service Manager. Explained that a grain cannot be substituted for a vegetable. If substitutions need to be made for a vegetable, it should be from the same vegetable subgroup. Reviewed the vegetable subgroups with the Food Service Manager.
- Explained to the Food Service Manager that an apple banana does not credit the same as a Cavendish banana - two apple bananas are needed to credit as 1/2 cup of fruit.
- Explained to the vendor to maintain the Child Nutrition Labels and food labels for products that are served. Suggested he keep them organized by each week of the cycle menu by meal type.
- Explained to the Food Service Manager how to read the crediting information on the Child Nutrition Labels to update the production record templates.
\* - Explained to the Food Service Manager that with pre-plating as a reimbursable meal under OVS, only 3 components need to be plated, one of which is 1/2 cup fruit or vegetable. Other items should be left as a choice for the students to select. School Food Services Branch Supervisor stated she will train the manager on OVS requirements and how to bundle the meals correctly.
\* - Vendor is not checking refrigerator/freezer temperatures prior to beginning meal prep. Explained that temperatures should be checked first thing in the morning before starting. If there are temperatures out of appropriate ranges, manager is to determine steps to take to correct issue(s). Also reminded manager to maintain all temperature logs for appropriate timeframe.
- Reminded kitchen manager to ensure all items in refrigerators/freezers are labeled with item names and dates.
\* With the current menu, the SFA may continue to serve the same menu for grades 7-8 and 9-12.

Resource Management - Ke Ana La'ahana PCS (2411-2)

700. SFA accurately track all revenues and expenses?

Finding 9000: Other Finding

The SFA's Annual Financial Report (AFR) needs to be revised. Line 10 and Line 20 (USDA Foods Value) should be



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\$1,907.00. Based on the provided documentation, Line 19 also needs to be revised. Revisions completed during on-site review. No further action needed.

**Corrective Action:**

The SFA's Annual Financial Report (AFR) needs to be revised. Line 10 and Line 20 (USDA Foods Value) should be \$1,907.00. Based on the provided documentation, Line 19 also needs to be revised. Revisions completed during on-site review. No further action needed.

**Technical Assistance:**

Provided Technical Assistance on revising Annual Financial Report (AFR).

705. *SFA have internal controls to ensure only allowable costs charged?*

**Finding 9000: Other Finding**

There was an expense for \$21.25 for Supplies and Materials which was charged to the food service account by error. Since these are closed audited financial statements, it cannot be removed. Since this amount is immaterial, it will be disregarded. No further action needed.

**Corrective Action:**

There was an expense for \$21.25 for Supplies and Materials which was charged to the food service account by error. Since these are closed audited financial statements, it cannot be removed. Since this amount is immaterial, it will be disregarded. No further action needed.

**General Program Compliance - Ke Ana La'ahana PCS (2411-2)**

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

**Finding 9000: Civil Rights - Ethnic Data Report**

The SY 2017-18 Civil Rights Ethnic Data Report is incomplete. The ethnicity (Hispanic or Non-Hispanic) information was not completed. This was corrected on site.

**Corrective Action:**

Complete the Civil Rights Ethnic Data Report. This was corrected during the onsite review. No further action required.

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

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

The civil rights complaint process that is posted on the school's website does not contain the nondiscrimination statement.

**Corrective Action:**

1. Add the current nondiscrimination statement to the civil rights complaint process that is posted on the school's website. Submit a copy to HCNP.
2. Post the updated civil rights complaint process on the school's website. Provide the date this was completed.

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

**Finding 9000: Local Wellness Policy**

The wellness policy does not contain the following:

- Specific goals for nutrition and physical activity
  - Designated meeting dates
  - Schedule of when the policy is to be updated
  - Permit participation by the general public and the school community in the wellness policy process
- An assessment has not been completed on the policy.

**Corrective Action:**

1. Update the wellness policy to include the requirements listed above. A summary of the requirements is available at: [https://fns-prod.azureedge.net/sites/default/files/tn/LWPsummary\\_finalrule.pdf](https://fns-prod.azureedge.net/sites/default/files/tn/LWPsummary_finalrule.pdf)



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2. Submit a copy of the revised policy. Provide the date the revised policy will be posted on the school's website.
3. Assure HCNP the assessment will be completed as required.

**Technical Assistance:**

TA was provided on the LWP requirements. Provided template for Local Wellness Policy (Alliance for Healthier Generation) as well as a Local Wellness Policy tool that can be used to revise policy annually. Suggested the SFA complete the assessment tool annually at the annual meetings.

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

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

1. The vendor's food safety plan (dated January 2018 from School Food Services Branch) is incomplete. The charts, such as the Monitoring Log, were incomplete. The SOPs in this binder have not been signed as having been reviewed or implemented.
2. The vendor had SOPs in a separate file that were signed by all staff on January 23, 2018. These SOPs are outdated. The SOP for Receiving Deliveries listed 45 degrees for milk and eggs. Cold foods must be held at 41 degrees or below.

**Corrective Action:**

1. Complete the food safety plan dated January 2018 from School Food Services Branch. Provide the date when the food safety plan has been completed. This includes completing the charts and reviewing, signing, and dating all of the SOPs in the food safety plan.
2. Assure HCNP that the food safety plan will be reviewed annually and all appropriate staff will be trained and documented annually.

1501. *Records retained for 3 years?*

**Finding 9000: Recordkeeping**

The SFA has not been receiving delivery receipts for the meals received from their vendor for SY 17-18. The delivery receipts serve as documentation that the SFA received reimbursable meals and are needed to validate the invoice from the vendor.

**Corrective Action:**

Submit one week of delivery receipts for breakfast and lunch from April to demonstrate the vendor is providing delivery receipts to the SFA.

**Technical Assistance:**

Explained to the vendor that daily delivery receipts must be provided to the SFA so the SFA has documentation on what was received each day. Explained to the SFA that they need to ensure the vendor provides delivery receipts and that they must maintain this documentation.

1602. *On-site observation validate Off-Site Assessment Tool responses to SFSP & SBP Outreach questions?*

**Finding 9000: SBP Outreach**

The SFA has completed outreach for the School Breakfast Program once during this school year. The SFA is required to do outreach at the beginning of the school year and multiple times throughout the school year to inform families of the availability of school breakfast.

**Corrective Action:**

Submit documentation of breakfast outreach that has been done since the Administrative Review. If outreach has not been completed, explain the SFA's plan on completing breakfast outreach multiple times throughout the remainder of the school year.



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**Food Service Contact**

SASA  
(808) 961-6228

Month of Review: February 2018

Date of Onsite Review: March 8, 2018

**Meal Components & Quantities - Ke Ana La'ahana (549-PCS)**

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

**Finding 9000: Signage**

The breakfast menu and signage posted in the cafeteria do not list the second choice of cereal and toast that is available to the students. Signage must identify all items that constitute a reimbursable meal.

**Corrective Action:**

1. List all items that are available to the students on the calendar menu as well as on the daily breakfast signage that is posted in cafeteria.
2. Submit a copy of the April menu and a photo of the breakfast signage posted in the cafeteria for two days in April demonstrating that the two breakfast choices are included on the signage.

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 February 5-9, 2018. The daily vegetable requirement was not met on February 8, 2018 (short ½ cup for grades 7-8 and short ¾ cup for grades 9-12). Rice had been substituted for mashed potatoes. During the onsite review, the manager revised the production record template - rice was removed and mashed potatoes were added.

The review was expanded to the rest of February. The following issues were found.

On February 1, 2018, the daily grain requirement was not met for grades 9-12 (short 1 oz eq). During the onsite review, the manager corrected the production record template for the meal served on this day to show that the roll is 2 oz instead of 1 oz for grades 9-12.

On February 15, 2018, the daily vegetable requirement was not met for grades 9-12 (short ¼ cup). For the week of February 12-16, 2018, the weekly bean requirement was not met for grades 7-8 and grades 9-12 (short ¼ cup). Although there was no school on February 16, 2018, the requirement would not have been met based on the documentation provided for what would have been served on that day. The manager updated the production record template for the meal served on February 15, 2018 to show that an additional ¼ cup of edamame will be served to grades 9-12 to meet the weekly bean requirement and the daily vegetable requirement. However, grades 7-8 needs an additional ¼ cup of beans to meet the weekly vegetable requirement.

Tortilla chips were served on February 5 and February 21, 2018. The chips are made with whole grain corn with a trace of lime. The vendor did not provide documentation that the product has the FDA health claim on the packaging. After the onsite review, School Food Services Branch (SFSB) provided documentation on company letterhead to show that the product meets requirements for the FDA whole grain health claim. Therefore, this product meets the USDA whole grain-rich criteria.

It appears that the food service manager is not following the SFSB's cycle menu. Changes are being made resulting in the meal pattern requirements not being met. This was discussed with the SFSB Supervisor that is responsible for the school providing meals to Ke Ana Laahana.



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**Corrective Action:**

1. Update the production record template for the the meal that was served on February 15, 2018. The K-8 grade group is not meeting the weekly bean requirement (short 1/4 cup).
2. Describe in detail what has been done to ensure the food service manager is following the cycle menu and understands how to make appropriate substitutions that meet the meal pattern requirements. Submit documentation to support the response, such as training documentation.

**Technical Assistance:**

- Reviewed lunch meal pattern requirements with the Food Service Manager. Explained that a grain cannot be substituted for a vegetable. If substitutions need to be made for a vegetable, it should be from the same vegetable subgroup. Reviewed the vegetable subgroups with the Food Service Manager.
- Explained to the Food Service Manager that an apple banana does not credit the same as a Cavendish banana – two apple bananas are needed to credit as ½ cup of fruit.

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

**Finding 9000: Production Records**

The following issues were found with the production records:

1. 2/1/18 for breakfast, the factors and amount needed for the turkey ham were not correct. The production record template was corrected during the onsite review.
2. 2/8/18 for lunch, the crediting amount for the popcorn chicken breading was not documented. The production record template was corrected during the onsite review.
3. 2/12/18 for lunch, the crediting amount of the breading on the breaded chicken strips was not documented correctly. The production record listed 0.75 oz eq, but it should be 1 oz eq. The production record template was corrected during the onsite review. Also, on 2/12/18 for lunch, 3/4 cup of rice and #8 scoop are listed for grades 9-12. A #8 scoop measures 1/2 cup, not 3/4 cup. Although 1 oz eq was served instead of 1.5 oz eq, the daily grain requirement was still met.
4. 2/15/18 for lunch, the amount of grilled chicken strips per portion should be 3.53 oz instead of 3.35 oz. The production record template was corrected during the onsite review.

**Corrective Action:**

1. Describe how the issue with the 3/4 cup of rice and the #8 scoop will be corrected. Submit documentation demonstrating how the issue has been resolved.
2. Describe in detail what has been done to ensure the food service manager is completing the production records correctly (correct portions, serving utensil, crediting information, etc.). Submit documentation to support the response, such as training documentation.

**Technical Assistance:**

- Explained to the vendor to maintain the Child Nutrition Labels and food labels for products that are served. Suggested he keep them organized by each week of the cycle menu by meal type.
- Explained to the Food Service Manager how to read the crediting information on the Child Nutrition Labels to update the production record templates.

501. *Cafeteria staff trained on OVS?*

**Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.**

There is no documentation that staff have been trained on Offer vs Serve (OVS) this school year. The Food Service Manager at the vendor needs to be trained on OVS requirements.

**Corrective Action:**

1. Train all meal clerks, including substitute meal clerks, and the food service manager on OVS requirements.
2. Submit to HCNP training documentation (sign-in sheet, date of training, agenda).

**Technical Assistance:**

The school was provided technical assistance during the on-site visit. Explained to the Food Service Manager that with pre-plating as a reimbursable meal under OVS, only 3 components need to be plated, one of which is ½ cup fruit or vegetable.



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Other items should be left as a choice for the students to select. School Food Services Branch Supervisor stated she will train the manager on OVS requirements and how to bundle the meals correctly.

**General Program Compliance - Ke Ana La'ahana (549-PCS)**

*1405. Food safety inspection dates?*

**Finding 9146: Less than 2 food safety inspections were done in the current school year and no documentation that 2 inspections have been requested.**

The school has not received two food safety inspection reports for the current school year and no documentation was available to validate the SFA had requested two food safety inspections for the current school year.

**Corrective Action:**

Provide documentation to show that a second inspection was requested for SY 2017-18.