



SNP Administrative Review Findings

Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory PCS (2414-7)

Program Year 2018

**Ke Kula 'o Nawahiokalani'opu'u Iki
Laboratory PCS (2414-7)**
16-120 Opukaha'ia St.,
Kea'au, HI 96749-8135

Food Service Contact
Office assistant III
(808) 982-4260
Vendor: Island Catering Services,
INC.; Keaau Middle; Waimea
Elementary

Executive Contact
V.P.
(808) 982-4260

No. of Sites / Reviewed: 3 / 1
Month of Review: December 2017

Commendations

- * -Documents were readily available upon reviewers' arrival.
- Staff was attentive and quick to answer questions/retrieve needed documents.
- Applications were well organized and processed correctly.

Suggestions

- * Have Afterschool Snack students line up for snack in the order they are listed on the meal counting sheet.

Technical Assistance

- * TA provided on error prone applications. Two of the four applications that were marked error prone were not truly error prone. The SFA verified the correct applications.
- * Initialing and dating any changes made on the meal applications.
- * Maintaining equipment temperature logs, removing produce stickers, washing ready to eat fruit prior to prepping and serving.
- * Proper implementation of Offer vs Serve.
- * Excel sheet for Afterschool Snack Program meal counting not required if counts are made on tally sheet. Transferring counts to excel sheet increases the chance of errors.

Meal Counting & Claiming - Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory PCS (2414-7)

313. *On-site observation validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions?*

Finding 9000: Meal Charge Policy

The SFA does not have a written meal charge policy.

Corrective Action:

1. Create and submit a written meal charge policy. Refer to <https://www.fns.usda.gov/school-meals/unpaid-meal-charges> for guidance.
2. Distribute the policy to all school staff and households. Explain to HCNP how the policy was distributed.

Technical Assistance:

No later than July 1, 2017, all SFAs operating the National School Lunch and/or School Breakfast Program must have a written policy in place to address situations where children participating at the reduced price or paid rate do not have money to cover the cost of a meal at the time of the meal service.

Resource Management Comprehensive Review - Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory PCS (2414-7)

750. *Statement of Revenue and Expenses*



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Finding 9000: Other Finding

Annual Financial Report was not completed correctly.

Corrective Action:

Corrective action completed on site. Annual Financial Report was corrected/revised.

General Program Compliance - Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory PCS (2414-7)

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

Finding 9000: Civil Rights

The following issues were noted related to Civil Rights:

- Outdated civil rights forms in the SFA's civil rights binder
- The Ethnic Data Report was not kept in the same binder as all other civil rights documents. The report was not dated. This was corrected during the on-site review.
- The public release used for SY 17-18 did not contain the most current nondiscrimination statement.

Corrective Action:

1. Assure HCNP all outdated civil rights documents were removed from the civil rights binder.
2. Place a copy of HCNP's civil rights complaint procedure flowchart in the binder. Provide the date this was completed.
3. Assure HCNP that the SFA will use the most current version of the public release provided by HCNP each school year.

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

Finding 9000: Local Wellness Policy (LWP)

The LWP does not contain all of the requirements. A copy of the needed changes was provided during the on-site review. The following was noted:

- The SFA has yet to update or modify the LWP as required for the triennial assessment.
- An identified leader to be responsible for overseeing the LWP has yet to be appointed and specified in the LWP.
- The LWP does not establish when and how often committee members plan to meet.
- The LWP does not contain specific goals for physical activity.
- The SFA has yet to provide updates on the LWP to the public.

Corrective Action:

1. Update the LWP with the changes listed above. Submit a copy of the updated LWP to HCNP for review.
2. Post a copy of the most current LWP and assessment of the LWP on the school's website. Provide the link in which the LWP can be located on the website.
3. Assure HCNP that a copy of each assessment will be kept on file for three years plus the current school year.

Technical Assistance:

The USDA LWP requirements can also be located at https://fns-prod.azureedge.net/sites/default/files/tn/LWPsummary_finalrule.pdf.

1217. Frequency of tracking training hours

Finding 9000: Professional Standards

SFA does not maintained individual training logs for each meal program staff member. The log that is kept on file for all staff contained incorrect information.

Corrective Action:

1. Complete and submit HCNP's training tracker log template for each meal program staff member. Submit to HCNP a copy of each staff member's training log. Training tracker template can be found on the HCNP website at <http://hcnp.hawaii.gov/training-resources/> > 2017.
2. Submit to HCNP supporting documentation for the training listed on the training logs.



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

Finding 9000: Breakfast Outreach

SFA did not conduct breakfast outreach multiple times throughout the school year.

Corrective Action:

1. Explain to HCNP how the SFA plans to conduct more breakfast outreach. Include in the explanation the mediums in which the information will be distributed.

Technical Assistance:

Breakfast outreach must be done multiple times throughout the school year, not just at the beginning of the year.



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Laboratory (563-PCS)
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(808) 982-4260

Month of Review: December 2017

Other Federal Programs - Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory (563-PCS)

6. Day of review Menu, Meal Patterns, Production records.

Finding 9000: Afterschool Snack Program

The following issues were noted relating to the Afterschool Snack Program:

- The SFA did not have a product formulation statement on file for the Nutrigrain bar. The statement was obtained during the review period. The statement revealed that the Nutrigrain bar credits as 0.75 ounce equivalents (oz. eq.) of grain. This does not meet the snack meal pattern.
- Cereal is listed on the snack menu as a serving size of ¾ cup or 1 oz. eq., and it is listed on the production record as a 1 cup serving size. In order to meet the 1 oz. eq. requirement, 1 full cup of cheerios must be served.
- The meal counts from the day of review (1/18/18) were not transferred over correctly to the excel spreadsheet. The written meal counts show 64 snacks were served. The excel document and production record show that 65 snacks were served. The SFA may only claim 64 snacks.

Corrective Action:

1. Serve two Nutrigrain bars at snack to meet the grain requirements or replace the Nutrigrain bar with a different product that provides the minimum 1 oz. eq. Explain to HCNP how the issue will be corrected.
2. Update the snack menu to reflect the correct portion size of Cheerios. Submit to HCNP a copy of the updated menu.
3. Update Afterschool Snack Program records to reflect 64 snacks. If SFA continues to transfer meal counts to an excel sheet, SFA must have two staff members review the counts. Explain to HCNP the meal counting procedures the SFA intends to implement.

Meal Components & Quantities - Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory (563-PCS)

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

Finding 9000: Meal Pattern and Quantities - Day of Review

The following issues were noted on the day of review for the lunch meal service - January 18, 2018:

- The popcorn chicken is listed on the production record as providing 2 ounce equivalents (oz. eq.) meat and 2 oz. eq. grain. Based on the label, the chicken credits as 2 oz. eq. meat and only 1 oz. eq. grain.
- The corn muffin is listed on the production record as providing 1 oz. eq. grain. Based on the recipe, the muffin credits as 1.25 oz. eq. for grades K-8.
- The root vegetables are listed on the production record as dark green vegetables. Since the medley of vegetables contain a starchy vegetable, the medley can only credit as "additional vegetables".
- It was observed that the SFA serves grades 7-8 the same portion sizes as grades 9-12. The production record conveys that grades 7-8 are receiving the same portion sizes as grades K-6.

Corrective Action:

1. Correct production record templates with the above crediting changes. Submit a copy of the updated production record to HCNP for review.
2. The production records must be updated to reflect what is served to each grade. If the production record cannot be altered, the SFA must serve grades 7-8 the portion sizes indicated on the production records. Explain to HCNP how the issue will be



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corrected.

3. Update the production record template for when root vegetables are served showing the correct classification. Submit a copy of the updated production record 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

The week of 12/11-15/2017 was chosen for review. The following crediting issues were noted:

Breakfast:

-12/12/17: The vendor does not follow the exact banana bread recipe. The vendor does not include how many portions are in one pan on the recipe. The production record states that one slice of banana bread provides 1.5 ounce equivalents (oz. eq.).

After discussing the recipe with the vendor, the banana bread credits as 1.25 oz. eq. per slice.

-12/13/17: The breakfast chicken patty is listed on the production record as 1 oz. eq. meat. Based on the label, the patty credits as 1 oz. eq. meat and 0.25 oz. eq. grain.

-12/15/17: The purchased cinnamon bun is listed on the production record as 2 oz. eq. grain. Based on the label, the bun credits as 1.25 oz. eq. grain.

Lunch:

12/12/17: The chicken nuggets are listed on the production record as 2 oz. eq. meat and 0.75 oz. eq. grain. Based on the label, the chicken nuggets credit as 2 oz. eq. meat and 1 oz. eq. grain.

Also on 12/12/17, the production record shows that the meal served is short ¼ cup of vegetables. After speaking with the food service director, the vendor left baby carrots off of the production record. The food service director was able to submit a picture of the meal that showed where ¼ cup of baby carrots was served. This will be accepted.

Corrective Action:

1. Create new recipe for the banana bread to reflect how the bread is actually made. Recipe should include number of portions per recipe and the correct crediting per serving. Submit a copy of the updated recipe to HCNP for review.
2. Update production record templates with the above crediting changes. Submit to HCNP each updated production record.

Technical Assistance:

All documents including the menu, production record, transport receipt, and menu planning templates must be consistent with the corresponding recipe or label.

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

Finding 9000: Offer Versus Serve (OVS)

Despite the SFA participating in OVS, there seems to be a large amount of waste. One of the purposes of OVS is to assist in reducing waste. At breakfast meal service on the day of review (1/19/18), all items were bundled except for the milk.

Suggestion: Bundle everything except for the juice and the milk. Staff may encourage students to take all components; however students cannot be made to take all components under OVS.

Corrective Action:

1. Explain to HCNP how the SFA will better implement OVS at the breakfast meal service.

General Program Compliance - Ke Kula 'o Nawahiokalani'opu'u Iki Laboratory (563-PCS)

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

Finding 9000: SFA Self-Monitoring

The SFA completed the MC-7 form for breakfast. The breakfast review resulted in findings. The SFA must conduct a follow up review of the breakfast service within 45 calendar days to ensure corrective action was implemented. The follow up review



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was not completed.

The SFA has yet to complete the MC-7 form for lunch meal service. All reviews must be completed prior to February 1.

Corrective Action:

1. Complete the follow up review for the breakfast meal service. Submit a copy of the MC-7 form to HCNP for review.
2. Complete the self-review for the lunch meal service. Submit a copy of the MC-7 form to HCNP for review. If review results in a follow up review, provide the projected date of the follow up review.

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

Finding 9000: Food Safety - SFA

The following issues were observed relating to food safety:

- The handwashing sink at the SFA did not have paper towels. Reviewer did not see staff and student helpers wash hands prior to putting on gloves. This was corrected during the on-site review.
- Produce stickers were left on the apples at the lunch meal service. Stickers must be removed during the washing process.
- It was observed that the kiwi for FFVP was not washed prior to prepping. Ready to eat fruits must be washed prior to serving with all produce stickers removed.
- Equipment temperature logs are not kept for the milk cooler and refrigerator at the SFA. Logs must be kept for all equipment that stores program food.

Corrective Action:

1. Train all kitchen staff on the proper hand washing procedures. Include in the training the proper procedures for handling ready-to-eat foods, such as fruit. Submit to HCNP the training sign-in sheet.
2. Explain to HCNP how the SFA intends to keep the hand washing sink stocked with paper towels and soap.
3. Begin maintaining temperature logs for the milk cooler and refrigerator containing program foods. Submit a week of temperature logs to HCNP for review.

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

Finding 9000: Food Safety - Vendor

Pans of beef stew were stored on the top shelf of the freezer at the vendor's facility and dated 8/2017. There were also pans dated 5/2017. This is not allowed. All foods that are out of date should be discarded immediately.

Corrective Action:

1. Designate staff to check refrigerators, freezers, and pantry for expired foods on a regular basis.
2. Create a standard operating procedure (SOP) on how staff is to check for and handle expired foods. Submit to HCNP a copy of the SOP.
3. Train kitchen staff on the new SOP. Submit to HCNP a copy of the training sign-in sheet.