



**SNP Administrative Review Findings**

**Kua 'O Ka La PCS (2415-5)**

*Program Year 2018*

**Kua 'O Ka La PCS (2415-5)**

14-5322 Kalapana-Kapoho Rd  
Pahoa, HI 96778

**Food Service Contact**

Business Manager  
(808) 965-2188  
Vendor: Pahoa High School

**Executive Contact**

Head of School  
(808) 640-3439

No. of Sites / Reviewed: 3 / 1  
Month of Review: January 2018

**Commendations**

- \* There has been improvement in the implementation of the programs at Kua O Ka La since the last review.
- \* Meals looked appealing.
- \* Documents were organized.

**Suggestions**

- \* Use a smaller but taller container to store the plastic forks so that students can grab the handle portion of the forks
- \* Suggested the SFA use a meal counting roster (not the order roster) to count the 1st and 2nd graders that eat breakfast at the main campus so that the POS computer system meal count totals can be used for the main campus. Also suggested that if meal orders need to be tracked by student, highlight the square to indicate the student ordered a meal. Then use a "X" when a student receives a reimbursable meal.
- \*

**Technical Assistance**

- \* Reviewers provided technical assistance on how to try to determine their identified students using DC lists that the SFA did have on file.
- \* Informed NSLP Coordinator where the civil rights documentation is available on the HCNP website.
- \* Provided TA on completing the Annual Financial Report.
- \* TA provided on nonprogram food cost (adult meals).
- \* TA provided - must have two milk types available throughout the meal service, including Kindergarteners. The school needs to inform the vendor to send two types of white milk if the school does not want chocolate milk as an option for the Kindergarteners. Explained to the SFA to inform the vendor to send more of the popular milk type. It was observed that a number of students chose chocolate milk but placed it on the sharing table. Suggest informing students that if they do not want their milk to take the white milk and place it on the sharing table since the school ran out of chocolate milk during meal service.
- \* Technical assistance was provided to the SFA that the delivery receipts must have all of the food items listed. It is the SFA's responsibility to make sure that they received all of the items that are in the meal. The delivery receipt serves as proof of the receipt of reimbursable meals.

**Meal Counting & Claiming - Kua 'O Ka La PCS (2415-5)**

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

**Finding 9000: Meal Counting and Claiming - Back up system**

During breakfast service, the computer POS system stopped operating in the middle of meal service. The meal clerk used the meal order roster to mark who took a reimbursable meal. The SFA should have had a meal counting roster ready as a back up to their POS computer system to keep the meal order information separate from the meal counting information to prevent any confusion and it is clear which students were counted manually once the computer POS system stopped working. It was quite difficult to determine which students were marked as having received a reimbursable meal once the computer POS failed to operate.



**SNP Administrative Review Findings**

**Kua 'O Ka La PCS (2415-5)**

*Program Year 2018*

**Corrective Action:**

1. Describe to HCNP how the issue above has been corrected. Submit to HCNP supporting documentation demonstrating how the issue has been corrected.
2. Provide the date this has been completed.

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

**Finding 9000: Meal Counting and Claiming - Computer POS and Manual Roster**

The SFA is not maintaining and updating the computer POS system or the manual meal counting roster.

1. The computer POS system has students listed in the wrong grade. Students in the computer POS system are listed in different grades when compared with the manual meal counting roster.
2. The manual meal counting roster is not being updated in a timely manner. For example, when a student has withdrawn from the school, the name of a new student is handwritten next to the name of the student who has left. This was found on the meal counting records for January, February, and March. There are also students who were added by hand on the meal counting roster in January that are still being added by hand in March.

These practices are unacceptable and must be corrected. There appears to be a disconnect between the staff who are responsible for the student enrollment, staff responsible for maintaining the POS systems, and staff doing the meal counting.

**Corrective Action:**

1. Create written procedures on maintaining and updating the computer POS system. Include in the procedures what actions are taken whenever a student withdraws from the school and enters the school in the middle of the school year. Specify the staff (job titles) who are responsible for each task and when the task is to be completed. Also, include what steps will be taken to ensure the students are entered in the correct grade.
2. Create written procedures on maintaining and updating the manual meal counting roster. Include in the procedures what actions are taken whenever a student withdraws from the school and enters the school in the middle of the school year. Specify the staff (job titles) who are responsible for each task and when the task is to be completed. Change the meal counting roster that is being used to be either daily, weekly, or monthly as opposed to 12 days. Include the change in the procedures.
3. Submit the written procedures on maintaining and updating both the computer POS system and the manual meal counting roster. Submit supporting documentation demonstrating the procedures are being followed. Supporting documentation includes the updated POS system print out and manual meal counting roster showing all students are listed in the correct grade, updated meal counting rosters showing students who entered the school in the middle of the school year are no longer being handwritten on the meal counting roster, and a meal counting roster that is no longer every 12 days.
4. Train all appropriate staff on these procedures. Submit training documentation (sign-in sheet, date of training, agenda).

**Technical Assistance:**

Explained to the NSLP Coordinator how to update the meal counting roster. When a student withdraws, black out the meal counting roster the rest of the week/month so meals cannot be claimed for that student. When a student enters the school in the middle of the week/month, black out the dates prior to when the student entered the school so that meals cannot be claimed for that student for any dates the student was not enrolled.

If the manual meal counting roster is set up to be submitted more frequently, such as weekly, staff would know which students are being added to or crossed off from the meal counting roster. The school also needs to have a system in place to communicate with the NSLP coordinator on the students who leave and enter the school so the POS systems can be updated in a timely manner.

316. *SA validated meal counts – school level meal counts consolidated correctly? Enter data.*

**Finding 9051: SFA's Review Period claim not validated.**

There are differences between the SFA's Review Period claim and the State agency's validated counts for lunch and breakfast for the review period.

- Pualaa (Main Campus): difference between the SFA's claim and the SA count was an underclaim of 27 breakfasts and an overclaim of 10 lunches.



## SNP Administrative Review Findings

Kua 'O Ka La PCS (2415-5)

### Program Year 2018

- Nanawale (Pre-K): difference between the SFA's claim and the SA count was an overclaim of 12 breakfasts and an underclaim of 12 lunches.
- Opihikao (Gr. 1-2): difference between the SFA's claim and the SA count was an overclaim of 11 breakfasts and an overclaim of 6 lunches.

The differences appear to have resulted from the following issues:

1. During lunch, a few students at the main campus are using the incorrect PIN number. They are using the PIN number for students in grades 1 and 2 that are at another site.
2. Students are listed in the wrong grade in the computer POS system.
3. On 1/9/18 at the main campus, the primary meal clerk was not working so the roster was used instead of the POS computer system. The information on the roster was entered into the POS computer system. There were discrepancies between what was on the roster and what was in the computer POS system.
4. During breakfast, some of the students in grades 1 and 2 eat at the main campus instead of at their site. These students enter their PIN number into the POS computer system. Because of this, the meal clerk used a combination of the meal order roster and the POS computer system count to determine the total number of the main campus students who ate versus the 1st and 2nd graders. The meal counts for the 1st and 2nd graders at the main campus were included in the claim for the other site.
5. Different symbols are used at the different sites.
  - Main Campus: "I" means the student received a reimbursable breakfast for grades 1-2.
  - Grades 1-2: "I" means a meal was ordered. "X" means the student received a reimbursable meal.
  - Pre-K: "I" means the student received a reimbursable meal.
  - Kindergarten: the meal counting roster is being used to count meals and take attendance. This is not acceptable. The way the "X" and "A" is written makes it very difficult to distinguish one from the other. The other symbols used are a backwards check with a circle around it and a "X" with a circle around it. The circles mean that the student was tardy but got a meal.
6. Meal counts on the rosters are not being totaled correctly.
7. Nanawale's (Pre-K) meal counting roster:
  - Breakfast meal counts are not recorded under the correct date listed; they are recorded under the previous day. For example, breakfast counts for January 10, 2018 are recorded under the date of January 9. This practice must be stopped.
  - Breakfasts are being claimed when the students are absent. The meal counts were compared to the attendance. There were a total of 11 breakfasts in January that were claimed but the students were absent. These meals will be disallowed.

### Corrective Action:

1. Revise the SFA's current meal counting and claiming procedure to address all of the issues noted above. The SFA's meal counting and claiming procedure must demonstrate the SFA is able to obtain accurate meal count totals, including when the back up system is used. Keep the meal counting procedure simple.
2. Determine which students are using the incorrect PIN number. Describe how this issue has been corrected to prevent students from using the incorrect PIN number.
3. Correct the computer POS system. Make sure the grade levels for each student are correctly entered.
4. Use the same meal counting symbols at all sites. Include the symbols that will be used in the meal counting and claiming procedure. Do not allow sites to use the meal counting sheet for attendance.
5. Assign at least two people to calculate the meal counting totals. Include this in the meal counting and claiming procedure.
6. Describe how Nanawale's meal counting issues will be corrected.
7. Submit to HCNP the revised meal counting and claiming procedure.
8. Train all appropriate staff, including meal clerks and substitute meal clerks, on the revised meal counting and claiming procedures. Submit training documentation demonstrating staff have been trained (sign-in sheet, agenda, date of training).
9. Provide the date the revised meal counting and claiming procedure was implemented.
10. Submit meal counting documentation for the month of May for each site (computer POS print out, meal counting rosters, Edit Check Worksheet, and any other documentation needed to confirm the number of meals that were claimed for reimbursement) that support the claim submitted for reimbursement.

### Technical Assistance:

Suggested the SFA use a meal counting roster (not the order roster) to count the 1st and 2nd graders that eat breakfast at the main campus so that the POS computer system meal count totals can be used for the main campus.

Also suggested that if meal orders need to be tracked by student, highlight the square to indicate the student ordered a meal.



**SNP Administrative Review Findings**

**Kua 'O Ka La PCS (2415-5)**

**Program Year 2018**

Then use a "X" when a student receives a reimbursable meal.

**Resource Management - Kua 'O Ka La PCS (2415-5)**

700. SFA accurately track all revenues and expenses?

**Finding 9000: Annual Financial Report**

The Annual Financial Report (AFR) was not completed correctly.

**Corrective Action:**

The AFR needs to be corrected. Corrective action completed on site. No further action required.

**General Program Compliance - Kua 'O Ka La PCS (2415-5)**

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

**Finding 9000: Civil Rights - Complaint Form, Procedures, Ethnic Data Report**

The civil rights folder did not contain the complaint form or procedures. This was corrected onsite on 2/20/18.

The SFA did not complete the Civil Rights Ethnic Data Report by October 31. This was corrected onsite on 2/21/18.

**Corrective Action:**

1. Include the civil rights complaint form and procedures in the SFA's civil rights folder. This was corrected onsite on 2/20/18.
2. Complete the Civil Rights Ethnic Data Report. This was corrected onsite on 2/21/18.

810. Non-discrimination on appropriate Program materials?

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

The CEP press release does not include the nondiscrimination statement.

**Corrective Action:**

Assure HCNP that the press release beginning with SY 18-19 will include the nondiscrimination statement.

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

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

LWP does not meet the USDA requirements. The LWP is not meeting the following:

- Identify wellness policy leadership
- Permit participation by the general public and school community
- Update the public on the wellness policy, including any updates to and about the wellness policy on at least an annual basis

**Corrective Action:**

1. Revise the LWP to include the requirements as listed above.
2. Submit to HCNP a copy of the revised LWP.
3. Provide the date the revised LWP will be posted on the school's website.

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

**Finding 9000: Professional Standards - School Nutrition Program Director**

The school nutrition program director has not yet met the required training hours requirement of 12 hours for SY 17-18 (short 5 hours).

**Corrective Action:**

Submit to HCNP a plan on how the school nutrition program director will meet the required training hours requirement by the end of SY 17-18. If annual training hours have already been met, submit the completed training log.



**SNP Administrative Review Findings**

**Program Year 2018**

1215. *Validate OFS #1205 - Did School Nutrition Manager meet annual training requirements?*

**Finding 9000: Professional Standards - School Nutrition Program Manager**

The school nutrition program manager has not yet met the required training hours requirement of 10 hours for SY 17-18 (short 9.75 hours).

**Corrective Action:**

Submit to HCNP a plan on how the school nutrition program manager will meet the required training hours requirement by the end of SY 17-18. If annual training hours have already been met, submit the completed training log.

1217. *Frequency of tracking training hours*

**Finding 9000: Professional Standards - Training Log**

The SFA is not documenting the training hours on a tracking tool.

**Corrective Action:**

1. Complete the HCNP Training Tracker Tool for each school nutrition program employee.
2. Submit to HCNP the completed tool for each school nutrition program employee for SY 17-18.

1219. *Validate OFS #1209 - Employees outside of the School Nutrition Program with School Nutrition Program duties receive training?*

**Finding 9000: Professional Standards - Non-school Nutrition Staff**

The following employees did not meet the required training hours requirement:

- One staff completed 2.25 hours (short 1.75 hours)
- Another staff completed 1.75 hours (short 2.25 hours)
- Another staff completed 1.75 hours (short 2.25 hours)
- One staff did not complete any training (short 4 hours)

**Corrective Action:**

Submit to HCNP a plan showing how each employee will meet the required training hours requirement by the end of SY 17-18. If annual training hours have already been met, submit the completed training log for each employee.

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

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

SFA's food safety plan has not been updated. Jocelyn is still listed as the food service point of contact. The food safety plan also lists meals are vended by Keonopoko Elementary, which is not the current vendor. The Standard Operating Procedures (SOPs) are not signed as implemented and reviewed. Some SOPs were signed in 2012 by a former employee. The food safety plan has not been reviewed annually.

**Corrective Action:**

1. Update the food safety plan.
2. Review, sign, and date the SOPs.
3. Provide the date the food safety plan has been updated and the date the SOPs were reviewed and signed.
4. Assure HCNP that the food safety plan will be reviewed annually and all appropriate staff will be trained and documented annually.

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

**Finding 9000: Reporting and Recordkeeping**

The Annual Financial Report was not submitted to HCNP by the specified deadline.

**Corrective Action:**

Describe what the SFA will do differently to ensure reports are submitted to HCNP by the specified deadlines.



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***Program Year 2018***

*1501. Records retained for 3 years?*

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

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. The SFA did not maintain documentation to support the CEP data that was submitted to HCNP for SY 17-18.

**Corrective Action:**

1. Describe to HCNP how the SFA will maintain all program records for at least the required 3 years plus the current fiscal year or until the resolution of any audits.
2. Describe in particular how the SFA will maintain CEP documentation to support the data submitted to HCNP in April.

Note: CEP records will need to be maintained for at least 4 years.

**Technical Assistance:**

Reviewers provided technical assistance on how to try to determine their identified students using DC lists that the SFA did have on file. Emphasized to the SFA that they must keep their documentation.



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*Program Year 2018*

**Kaimu Kapoho (557-PCS)**

14-5322 Kalapana-Kapoho Rd  
Pahoa, HI 96778

**Food Service Contact**

NSLP Coordinator  
(808) 965-2193

Month of Review: January 2018

Date of Onsite Review: February 20, 2018

**Meal Counting & Claiming - Kaimu Kapoho (557-PCS)**

*318. DOR - accurate meal counts by category at POS? Enter data.*

**Finding 9000: Meal Counting and Claiming - Day of Review \*Repeat Finding**

The day of review meal counts for breakfast and lunch could not be validated. There was an overclaim of one breakfast and an overclaim of one lunch.

The following issues were found during the observation of breakfast:

1. The meal clerk is trying to do too many things at the same time (checking the roster to make sure the student ordered breakfast, taking lunch and breakfast orders, checking the meal is reimbursable, and ensuring the student entered the correct PIN number into the system). One person cannot be responsible to complete all of these tasks at once within a few seconds. The meal clerk needs to ensure that all meals counted are reimbursable and that the students are entering the correct PIN number. Assign another employee to check the ordering. It was observed that a number of students did not take milk at breakfast. The reviewer reminded the meal clerk multiple times to check that the students had their milk. Remember, meals that do not contain all of the required components are considered nonreimbursable. Having one person do the meal order and meal counting is a repeat finding.
2. During breakfast service, the POS computer system stopped operating in the middle of meal service. The meal clerk used their meal order form to mark who took a reimbursable meal. Instead of using the meal order form, have a copy of the most current roster/print out of students from the POS computer system on hand to use in the event the POS computer system is not working to record meal counts. It was difficult to determine the day of review count for breakfast using the POS computer system and the meal order form.

**Corrective Action:**

1. Revise the SFA's meal counting procedure to correct the issues identified above. Assign a second person to handle all of the ordering so that the meal clerk focuses on making sure each meal is reimbursable and that the student entered the correct PIN number.
2. Submit to HCNP the revised written meal counting procedure that is being followed, including the procedure that will be followed when the computer POS is not working. Keep the meal counting procedure simple.
3. Train all appropriate staff, including any substitutes on the new procedure. Submit training documentation demonstrating all appropriate staff have been trained (sign-in sheet, date of training, agenda).
4. Provide the date the procedure was implemented.

**Meal Components & Quantities - Kaimu Kapoho (557-PCS)**

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

**Finding 9053: Milk variety not offered throughout serving period on Day of Review. \*Repeat Finding**

As observed on the Day of Review, at least two required milk varieties were not available throughout the serving period on all meal service lines.

1. During breakfast and lunch services, the school ran out of fat free chocolate milk. Two types of milk must be available throughout the meal service (9 students at breakfast and 39 students at lunch did not have an option).
2. During the kindergarten lunch service, all 12 kindergartners were provided with 1% white milk (students did not have an option).

Not having two types of milk available is a repeat finding. Fiscal action will be taken on these meals.



**SNP Administrative Review Findings**

**Kua 'O Ka La PCS (2415-5)**

*Program Year 2018*

**Corrective Action:**

1. Inform the vendor to increase the count for the more popular milk type and lessen the count of the less popular milk type.
2. If the school chooses to only let the kindergarteners have white milk, inform the vendor to provide two types of white milk (fat free milk and 1% white milk).
3. Describe to HCNP how and when each issue was corrected. Submit supporting documentation such as delivery receipts demonstrating the issue has been resolved.

**Technical Assistance:**

TA provided - must have two milk types available throughout the meal service, including Kindergarteners. The school needs to inform the vendor to send two types of white milk if the school does not want chocolate milk as an option for the Kindergarteners. Explained to the SFA to inform the vendor to send more of the popular milk type.

It was observed that a number of students chose chocolate milk but placed it on the sharing table. Suggest informing students that if they do not want their milk to take the white milk and place it on the sharing table since the school ran out of chocolate milk during meal service. .

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

**Finding 9000: Delivery Receipts**

On 1/7/18, the delivery receipt for lunch listed French bread at the top in the menu section but was not listed on the bottom where the menu item and portion sizes are specified. The delivery receipt must list all food items and the portion sizes.

**Corrective Action:**

1. Describe to HCNP how this issue has been corrected. Highly recommend creating delivery receipt templates (typing the left side of the Serving Site Daily Record) for each day of the cycle menu.
2. Submit one week of completed production records and corresponding completed delivery receipts (in April) to demonstrate the issue has been corrected.

**Technical Assistance:**

Technical assistance was provided to the SFA that the delivery receipts must have all of the food items listed. It is the SFA's responsibility to make sure that they received all of the items that are in the meal. The delivery receipt serves as proof of the receipt of reimbursable meals.

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

**Finding 9000: Production Records and Recipes**

1. The production records did not indicate all of the crediting amounts for all menu items or listed the incorrect crediting amounts.

- On 1/16/18, the grain crediting for the chicken patty was incorrect (should be 1 oz eq instead of 0.75 oz eq).

- On 1/18/18, the grain crediting for the popcorn chicken was not listed (should be 0.75 oz eq for Pre-K and 1 oz eq for K-A).

Also, the grain crediting was not listed for the one time item for farm to school, banana cream pie.

The vendor corrected the production record templates onsite for the Popcorn Chicken and Chicken Patty.

2. The production records indicate enough food was prepared/would have been prepared but the recipes for the Kalua Pork and Cabbage, Kalua Pork and Spinach, and Beef Broccoli have not been updated to reflect the current portion sizes and the meal pattern contributions the staff are serving.

**Corrective Action:**

1. Assure HCNP that the vendor will include all crediting amounts on the production record template.
2. Update the Kalua Pork and Cabbage, Kalua Pork and Spinach, and Beef Broccoli recipes to reflect the current portion sizes and the meal pattern contributions.
3. Submit to HCNP a copy of the revised recipes.

**General Program Compliance - Kaimu Kapoho (557-PCS)**

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





**SNP Administrative Review Findings**

**Kua 'O Ka La PCS (2415-5)**

**Program Year 2018**

**Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.**

The SFA did not conduct an on-site review of the meal counting and claiming procedure at all sites prior to February 1 of the current Program Year.

Lunch: The SFA completed the lunch on-site review for two sites - Nanawale and Opihikao. The SFA must review lunch at all sites annually. Therefore, the SFA must complete an on-site review for the main site.

Breakfast: The SFA did not complete the breakfast on-site review at any of the three sites. The SFA must review breakfast at at least half of the sites this school year. The other half of the sites must be reviewed next school year prior to February 1.

**Corrective Action:**

1. Complete the on-site review for the main site for lunch.
2. Complete the on-site review for at least two sites for breakfast. The third site must be reviewed for breakfast next school year by February 1.
3. Submit to HCNP a copy of the completed reviews.

*1300. Potable Water – free and available to all students, lunch and breakfast?*

**Finding 9000: Potable Water**

The SFA did not have cups readily available next to the water jug during meal service. The SFA must provide cups at no cost to the child. Children cannot be required to bring their own cups for water provided in a bulk container.

**Corrective Action:**

1. Make cups available to the students next to the water jug.
  2. Describe how this issue has been corrected. Provide the date this was corrected.
- Suggested that the school place cups in a covered plastic container so students are able to access the cups when they would like water.

*1407. SFA written food safety plan implemented?*

**Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.**

During lunch meal service, high schoolers had the option to select an apple as part of their reimbursable meal. The apples were in a plastic re-sealable bag. The students used their hands to grab an apple from the bag.

**Corrective Action:**

1. Designate staff to serve fruit with gloved hands when the fruit does not have a peel to prevent contamination.
2. Provide the date this was corrected.

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

**Finding 9150: Storage violations were observed.**

The following issues were observed:

1. Rice seasoning in storage room was dated 10/24/13.
2. Refrigerator closest to the storage room contained an open bag of Halls cough drops and an unlabeled Styrofoam container of chili that seemed to be for personal consumption.
3. The walk-in freezer had boxes stored on the floor and appeared to be disorganized. Food must be stored at least 6 inches above the floor.

**Corrective Action:**

1. Describe how each issue identified above was corrected.
2. Provide the date each issue was corrected.