



Program Year 2018

**Wai'alaie Elementary Public Charter School
(1429-0)**
1045 19th Ave.
Honolulu, HI 96816-4606

Food Service Contact
Chief Operating Officer
(808) 733-4880
FSMC: Sodexo

Executive Contact
CEO/Head of School
(808) 733-4880

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

Commendations

- * The salad bar has a nice variety of fresh fruits and vegetables, and the students seem to really like the choices.
- * Sodexo does a good job at buying local produce and bread – very appealing signage relating to local produce sources.
- * Menu documentation is well organized.
- * Staff is very attentive and quick to correct findings.

Suggestions

- * Recommend self-monitoring of meal counting and claiming procedures (MC-7 Form) since there are two serving locations.
- * Preschool meal counters are distracted during meal service. Recommend having another staff member point students to the table they should sit at, and have the meal counter stand by each table and focus on counting meals as the student sit down to their meal.

Technical Assistance

- * Informed SFA to complete ECW daily or weekly, not at one time at the beginning of the month.
- * Informed SFA to forward complaint to HCNP within 5 working days. Follow HCNP procedures.
- * Informed staff to update POS immediately when students withdraw from the school to prevent any meal counting errors.
- * The SFA started using an online application system this school year. Informed SFA to check income eligibility guidelines (IEG) in the electronic application system prior to the approval of applications to ensure they are correct before processing applications each school year. Hawaii has different IEGs than the rest of the country.
- * Provided TA that the applications chosen for verification must be confirmed - reminded to print application and have confirmation official sign after confirming.
- * Provided TA to the meal clerk that if a child takes one half of a banana, it credits as ¼ cup of fruit. Therefore, they must take ¼ cup more fruit to meet the ½ cup requirement. This applies to preschoolers that are co-mingled during the breakfast service.
- * Assisted in correcting student eligibility status in POS system.

Certification and Benefit Issuance - Wai'alaie Elementary Public Charter School (1429-0)

126. *Certification Benefits/Issuance Review Method, applications correctly approved?*

Finding 9017: The application approval process is not implemented correctly.

One application (two students) was not approved correctly. The application was approved as reduced price but should have



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been free. For a gain in benefit, notify the household and change the POS within 3 operating days.

Corrective Action:

1. Submit a copy of the letter sent to the household notifying them of the change in the benefit.
2. Submit a copy from the POS system that shows the date the status was changed.

127. Correct income eligibility guidelines used to certify applications?

Finding 9000: Income Eligibility Guidelines

At the beginning of the school year, the wrong Income Eligibility Guidelines were used. The SFA's new electronic application system had the wrong Income Eligibility Guidelines in it.

Corrective Action:

Assure HCNP the SFA will check that the electronic application system has the correct Income Eligibility Guidelines for Hawaii before processing any applications each school year.

Technical Assistance:

The SFA started using an electronic application system this school year. Informed SFA to check income eligibility guidelines (IEG) in the electronic application system prior to the approval of applications to ensure they are correct before processing applications each school year. Hawaii has different IEGs than the rest of the country.

131. Applications denied incorrectly?

Finding 9022: The SFA denied some applications incorrectly.

Three applications (four students) were not approved correctly. The applications were approved as paid but should have been reduced price. For a gain in benefit, notify the household and change the POS within 3 operating days.

Corrective Action:

1. Submit a copy of the letter sent to the household notifying them of the change in the benefit.
2. Submit a copy from the POS that shows the date the status was changed.

138. Updating Benefits Issuance documents accurately, timely?

Finding 9000: Updating POS

According to the SFA's Off-site Assessment, the POS is not updated in a timely manner when a student withdraws from the school. The POS is updated when staff have time to do it which can be up to a week.

Corrective Action:

Describe to HCNP the SFA's current process that has been implemented of updating the POS in a timely manner when students withdraw from the school.

Technical Assistance:

Informed staff to update POS immediately to prevent any meal counting errors.

Verification - Wai'alaie Elementary Public Charter School (1429-0)

208. Confirmation Review – documentation on file, required procedures followed?

Finding 9037: Confirmation review not conducted as required.

Documentation demonstrating that a confirmation review took place was not on file at the SFA. SFA did not complete the confirmation review of the applications selected for verification.

Corrective Action:



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Describe to HCNP the SFA's plan/procedure that will be used beginning SY 18-19 to correct the issue listed above.

Technical Assistance:

Provided TA that the applications chosen for verification must be confirmed - reminded to print application and have confirmation official sign after confirming.

214. Student eligibility change due to verification – update Benefits Issuance list?

Finding 9046: Change in student benefit levels due to Verification results not updated as required.

For students whose eligibility changed due to Verification, the SFA did not update the eligibility status on the benefit issuance document(s) according to regulations. One application that was verified changed from reduced price to paid. The SFA did not update the POS accordingly. Even though Pre-K students are not charged for meals, the SFA must update the status in the POS system.

Corrective Action:

Submit documentation from the POS system showing the date the status was changed.

Meal Counting & Claiming - Wai'alaie Elementary Public Charter School (1429-0)

314. SFA following approved SFA-SA agreement?

Finding 9049: SFA not following the approved SFA-SA Agreement and/or Application.

The SFA is not following their approved SFA-State agency Application, including the Point of Service procedures. The following discrepancies were found between the approved application and observations during the review:

1. SFA is using Etrition, not Meal Tracker.
2. Meals are served in locations other than the main dining area - SFA is serving Pre-K lunch in the classroom.

Corrective Action:

Revise the SFA's application in HCNP Systems to reflect the SFA's current practices. Remember to complete and submit the offline form, On-Campus Meal Service and Counting Locations.

Resource Management Comprehensive Review - Wai'alaie Elementary Public Charter School (1429-0)

750. Statement of Revenue and Expenses

Finding 9000: Incorrect Annual Financial Report (AFR)

AFR was completed incorrectly. It had incorrect amounts for federal sources, USDA commodities, did not include USDA foods used expense, and did not include the general fund transfer in.

Corrective Action:

SFA revised AFR during on-site review. No further action required.

755. Allowable expenses

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

There was an unallowable expense charged to the nonprofit school food service account. This was due to miscoding. The Alert Alarm invoice 4/1/2017 for \$50.76 was for the administration office.

Corrective Action:

There was an unallowable expense charged to the nonprofit school food service account. This was due to miscoding. The Alert Alarm invoice 4/1/2017 for \$50.76 was for the administration office. This charge was removed, GL and AFR were revised. No further action required.



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General Program Compliance - Wai'alaie Elementary Public Charter School (1429-0)

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

Finding 9000: Special Dietary Needs

The following issues were found regarding special diets:

1. After reviewing the Special Diet list, one student is listed as having a peanut allergy when their medical statement states that they have a cashew allergy.
2. Three preschoolers receive soy milk. Only two of the three students have a medical statement on file. The soy milk that is served is not nutritionally equivalent to regular cow's milk, therefore the third student must have a medical statement on file in order to claim the meals for reimbursement.

Corrective Action:

1. Assure HCNP the SFA's Special Diet list has been corrected to reflect the correct allergy for the student.
2. Describe how issue #2 has been corrected.

810. Non-discrimination on appropriate Program materials?

Finding 9000: Civil Rights - nondiscrimination statement is not current

The most current nondiscrimination statement is not on the notification letter to parents. Also, the font size is smaller than the smallest font on the document.

Corrective Action:

1. Update the Parent Notification of Eligibility letter to include the most current nondiscrimination statement. The font size of the nondiscrimination statement cannot be smaller than the smallest font on the document.
2. Submit to HCNP a copy of the revised letter.

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:

- An identified leader of the wellness policy
 - Permit participation by the general public and the school community (parents, students, representatives of the SFA, teachers of physical education, school health professionals, the school board, school administrators) in the wellness policy process
 - Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness
 - Nutrition guidelines for all foods and beverages for sale on school campus during the school day
 - Food and beverage marketing is not addressed
- 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
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, at a minimum, every three years.

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

Finding 9000: Professional Standards - Hiring Requirements

A new school nutrition program director was hired after July 1, 2015. The new school nutrition program director does not



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meet the hiring requirements. The SFA did not seek HCNP's approval prior to hiring.

Corrective Action:

1. Assure HCNP that the SFA will ensure the minimum hiring requirements are met when hiring a new school nutrition program director.
2. 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 Requirement

The new school nutrition program director has not yet received the required 8 hours of food safety training.

Corrective Action:

1. The new school nutrition program director must complete the food safety training requirement of at least 8 hours. A 12 hour food safety course called "Serving It Safe" is available at:
<http://www.theicn.org/Templates/TemplateDivision.aspx?qs=cEIEPTU=>
2. Submit training documentation (certificate) to demonstrate the food safety training requirement has been met.

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

Finding 9000: Professional Standards - Non-nutrition Program Staff

10 non-nutrition program staff have not yet met the required 4 hours of annual training this school year.

Corrective Action:

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

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

Finding 9000: SBP Outreach

SFA has only done breakfast outreach at the beginning of the school year. The SFA must also do outreach 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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Wai'alaie Elementary Public Charter School (149-PCS)
1045 19th Ave.
Honolulu, HI 96816-4606

Food Service Contact
Food Service Manager (Sodexo)
(808) 733-4884

Month of Review: November 2017
Date of Onsite Review: December 13, 2017

Meal Counting & Claiming - Wai'alaie Elementary Public Charter School (149-PCS)

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

Finding 9000: Meal Counting and Claiming - Preschool Meals

A checklist is used to count the preschool lunches served in the classroom. The checklist and students' ID cards (those present and absent) are given to the meal clerk in the cafeteria. The meal clerk separates the ID cards for those who are absent and then scans all other ID cards. The meal clerk is not checking that each card scanned is for a student who received a reimbursable meal as indicated on the checklist.

Corrective Action:

1. Revise the current meal counting procedure for entering the preschool student meals in the POS system.
2. Submit the SFA's revised procedure that is being followed that describes how the SFA is ensuring that the meal clerk scanned the correct ID cards daily for the preschool lunches.
3. Provide the date the new procedure has been implemented.

Meal Components & Quantities - Wai'alaie Elementary Public Charter School (149-PCS)

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

Finding 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.

As observed on the Day of Review, signage explaining what constitutes a reimbursable meal is not identified near or at the beginning of each meal service line. The menu was only posted for one serving line.

Corrective Action:

Post the menu at the beginning of the second meal service line. This was corrected during the onsite review. No further action required.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

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

Finding 9000: Meal Components and Quantities

The following issues were found during the review of menu documentation for the review period (11/13-11/17/17):

1. The daily and weekly grain requirements were not met for breakfast and lunch. The FSMC used non-enriched white rice for Hapa rice because the enriched white rice product typically used was infested with bugs. Therefore, 1/2 cup Hapa rice credits as 1/4 cup for the brown rice portion.
2. Breakfast: when students take all three grain/meat/meat alternate choices, the weekly grain requirement is greatly exceeded (over by 6.5 oz eq for the planned menu for the review period). The maximum grain requirement for grades K-5 is 10 oz eq. Exceeding the weekly maximum requirement may result in meals that are in excess of calories, saturated fat, and



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sodium.

3. The whole grain-rich requirement was not met. The hamburger buns are not whole grain-rich (contained oat bran which was more than 2% of the product's formula).
4. Although English muffin was not served during the review period (toast was substituted), the English muffin typically served contains farina (which is not a whole grain). The FSMC checked with the vendor and the farina is not enriched. This product can no longer be served.

Corrective Action:

1. Describe how each issue has been corrected. Provide supporting documentation for products currently being used (product labels, ingredient lists). Provide the date each issue was corrected.
2. For issue #2 described above, revise the breakfast cycle menu to better meet the weekly grain requirement. Submit the revised HCNP Menu Planning Template and USDA Certification Worksheet for each week of the revised breakfast cycle menu.

Technical Assistance:

Provided technical assistance to the FSMC that white rice must be enriched. White rice that is not enriched is considered not creditable. Should this happen in the future, the FSMC should serve all brown rice.

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

Finding 9000: Meal Components and Quantities - Preschool

Preschool meals are served in the classroom during lunch. During the review period, preschoolers received the same portion sizes as grades K-5 for lunch. The preschool meal pattern requirements must be followed when preschoolers are not co-mingled with the other grades.

Note: On the day of review, 12/13/17, it was observed that the SFA began making changes to the preschool meals. The preschoolers received a smaller portion of fruit and vegetable (1/4 cup each).

Corrective Action:

1. Revise the lunch cycle menu to meet the preschool meal pattern requirements.
2. Submit a copy of the revised HCNP Menu Planning Template for each week of the lunch cycle menu demonstrating the portions were adjusted for the preschool meals.

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

Finding 9000: Production Records, Menu Documentation

Production records are not being completed correctly. The following issues were found during the review period:

1. On 11/14/17 (breakfast), a #12 scoop was listed for 1/2 cup rice. #12 scoop is 1/3 cup, not 1/2 cup. The FSMC stated that the wrong scoop was inadvertently listed on the production record.
2. On 11/13/17 (lunch), the chicken patty breading was incorrectly listed as 1 oz eq (the CN label indicated the breading provides 0.5 oz eq).
3. On 11/16/17 (lunch), cheese for the hamburger macaroni was not listed on the production record. The FSMC stated that cheese was served and a revised production record was submitted.
4. The serving size and credited amounts listed on the production record are the same amount. Raw leafy greens credit at half the volume served. Therefore, when 1/2 cup of lettuce is served, it credits as 1/4 cup of vegetable.
5. On most production records, "spoodle" or "scoop" is listed under "Serving Utensil". Identify the specific spoodle/scoop used to confirm the correct portion was served.
6. White out was used on the production records. Do not use white out on any official documents. To make corrections, line through the error, write the change/correction, then initial and date.

The following issues were found with the menu documentation for the review period:



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1. The Menu Planning Template for breakfast listed 1/2 cup fruit. 1 cup of fruit is required at breakfast. The Menu Planning Template was corrected.
2. The Menu Planning Template for breakfast listed #12 scoop for 1/2 cup of oatmeal and 1/2 cup of rice. #12 scoop measures 1/3 cup, not 1/2 cup. A #8 scoop must be used to serve 1/2 cup.
3. The product formulation statement submitted for the fajita seasoned chicken thigh strips was dated 2011. This could not be accepted because it was dated before the implementation of the new meal pattern requirements. An updated production formulation statement was provided.

Corrective Action:

1. Make production record templates that reflect the cycle menus for breakfast and lunch. Highly recommend typing out the planned sections of the production records so that it is not handwritten daily and to prevent errors identified above from occurring. Submit the production record templates that will be used/are being used for the week of the cycle menu that was used for 11/13-11/17/17 to demonstrate the first three issues identified above have been corrected.
2. Assure HCNP that the food service staff understand to no longer use white out to make corrections; a line will be used to strike through any errors and it will be initialed and dated.
3. Submit completed production records for one week to show that the Serving Utensil column is completed correctly and that white out is not being used.
4. Submit the revised Menu Planning Template for the week of the cycle menu used for 11/13-11/17/17 demonstrating the issues above have been corrected.
5. Assure HCNP all weeks of the cycle menu have been reviewed and that the errors identified above have been corrected for all weeks.
6. Assure HCNP that current product formulation statements will be used when determining the crediting of menu items.

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

Finding 9078: School is not properly implementing Offer vs. Serve.

During breakfast service on the day of review, there were two non-reimbursable meals. The meals did not contain at least 1/2 cup of fruit which is a requirement under Offer vs Serve (OVS). Half a banana credits as 1/4 cup of fruit, not 1/2 cup. Therefore, students need to take 1/4 cup more fruit to meet the 1/2 cup requirement.

It was also observed that the meal clerk sent students back to get a full serving of fruit/vegetable versus allowing students to take the minimum of 1/2 cup.

Corrective Action:

1. Retrain all meal clerks on what is a reimbursable meal under Offer vs Serve (OVS).
2. Submit training documentation demonstrating all appropriate staff have been trained, including substitute meal clerks (sign-in sheet, date of training, agenda).

Technical Assistance:

Provided TA to the meal clerk that if a child takes one half of a banana, it credits as 1/4 cup of fruit. Therefore, they must take 1/4 cup more fruit to meet the 1/2 cup requirement. This applies to preschoolers that are co-mingled during the breakfast service.

General Program Compliance - Wai'alaie Elementary Public Charter School (149-PCS)

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.

The most recent food safety inspection was not posted in a publicly visible location.

Corrective Action:

Post the most recent food safety inspection in a publicly visible location. This was corrected during the onsite review. No



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further action required.

1408. *Temperature logs available?*

Finding 9000: Food Safety - Temperature Logs

Equipment temperature logs had the same time (6:00 am) listed for all temperatures recorded.

Corrective Action:

1. Record the actual time the temperature is taken for the equipment on the temperature logs.
2. Submit the equipment temperature logs for March 2018.

Technical Assistance:

Explained to manager why it is important to put the exact time on the temperature logs.

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

Finding 9150: Storage violations were observed.

The SFA must ensure that all of its facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The following issues were found:

- Food is not stored 6 inches off the floor. Boxes of bananas were stored on the ground.
- Food is not labeled or dated. Condiment bottles, broccoli, and cheese were found unlabeled in refrigerator, unlabeled container of salt, white #10 can with no label.

Corrective Action:

Describe how each issue above has been corrected. Provide the date each issue was corrected.