



**SNP Administrative Review Findings**

**Kona Pacific PCS (2417-1)**

*Program Year 2017*

**Kona Pacific PCS (2417-1)**

79-7595 Mamalahoa Hwy  
Kealahou, HI 96750

**Food Service Contact**

Nutrition Program Coordinator  
(808) 322-4900

**Executive Contact**

Director  
(808) 322-4900

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

**Certification and Benefit Issuance - Kona Pacific PCS (2417-1)**

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

**Finding 9000: Meal Applications**

The SFA is requiring all households to complete the free and reduced price application as stated in the SFA's Welcome Packet for SY 16-17. This is NOT allowed. Households cannot be required to complete and submit an application.

**Corrective Action:**

1. Describe to HCNP what action the SFA is going to take to stop this practice.
2. Submit to HCNP a copy of the text that will be included in the Welcome Packet regarding meal applications.

**Verification - Kona Pacific PCS (2417-1)**

207. *Verified applications on file match FNS-742 and Off Site question #200?*

**Finding 9000: Verification**

The following information on the FNS- 742, Verification Summary Report, was incorrect:

- #3-3: SFA reported 0 students directly certified through programs other than SNAP. The SFA has 3 students in this category.
- #5-4: SFA reported 3 error prone applications. The SFA marked at least 6 applications with "EP". However, the SFA is not correctly identifying error prone applications – SFA identified applications as error prone but they were not and vice versa.

**Corrective Action:**

1. Correct the information on the FNS-742, Verification Summary Report in HCNP Systems.
2. Describe to HCNP the definition of an error prone application.
3. Describe to HCNP how the SFA will accurately identify error prone applications in the future.

**Meal Counting & Claiming - Kona Pacific PCS (2417-1)**

314. *SFA following approved SFA-SA agreement?*

**Finding 9000: Meal Counting and Claiming**

The meal counting system in use for the kindergarten classes is not a point of service counting system. The SFA is using the same information for ordering and counting meals.

**Corrective Action:**

1. Change the meal counting system so that the kindergarten meals are counted at the point of service separately from the meal ordering system.
2. Describe to HCNP how the system has been changed and how it meets the requirements of a point of service meal count.
3. Submit copies of the forms that will be used for the kindergarten meal counting.

**Resource Management - Kona Pacific PCS (2417-1)**



705. Procedures to ensure that only allowable costs were charged to the nonprofit school food service account?

**Finding 9000: Resource Management -The SFA serves a fresh fruit or vegetable snack to the 7th and 8th graders every morning.**

The SFA serves a fresh fruit or vegetable snack to the 7th and 8th graders every morning. The cost for this snack cannot be charged to either FFVP or to the NSLP nonprofit food service account since this is a non-program cost.

**Corrective Action:**

1. Describe to HCNP how this non-program cost will be handled in the accounting system.

**General Program Compliance - Kona Pacific PCS (2417-1)**

810. Non-discrimination on appropriate Program materials?

**Finding 9000: Civil Rights**

The letter being used by the SFA to notify households of meal benefit status does not contain the full non-discrimination statement. USDA requires the full statement on the letter and has provided a template letter for use. A copy of this letter was provided at HCNP annual training and is posted on the Hawaii Child Nutrition Programs website.

**Corrective Action:**

Submit to HCNP a copy of the meal benefit letter with the correct, full non-discrimination statement on it that the SFA will be using in the future.

810. Non-discrimination on appropriate Program materials?

**Finding 9000: Civil Rights**

The SFA Civil Rights manual contains outdated forms. The older forms do not have the correct nondiscrimination statement.

**Corrective Action:**

1. Replace the outdated forms in the SFA Civil Rights manual.
2. The current forms can be found on the Hawaii Child Nutrition Programs website: <http://hcnp.hawaii.gov/overview/nslp/>
3. Notify HCNP that the manual has been updated.

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

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

It is stated in the LWP that it will be reviewed on an annual basis, but there is no record of this being done. Also, the current LWP does not clearly define who the stakeholders are that participate in the LWP committee and what their relationship is to the SFA.

**Corrective Action:**

1. Revise the LWP to identify the stakeholders that make up the Wellness Committee. Include a list of the committee members (name and position or relation) in the LWP.
2. Establish a plan for reviewing and measuring the implementation of the LWP on an annual basis.
3. Identify who on the Wellness Committee will be responsible for ensuring compliance with the LWP regulations.
4. Post the revised LWP on the SFA website.
5. Submit to HCNP a copy of the revised LWP.
6. Describe to HCNP the plan to fully comply with the LWP regulations. See the Summary of the Final Rule as a reference: [https://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](https://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)

1219. Frequency of tracking training hours



*Program Year 2017*

**Finding 9000: Professional Standards**

The SFA is not including all nutrition staff in the training records and count of employees that need Professional Standards training hours. The kitchen staff has not been included.

**Corrective Action:**

1. Add all nutrition staff to the training tracking tool.
2. Submit to HCNP a copy of the training tracking tool that has been updated with all nutrition staff.
3. Develop a training schedule that shows how all the nutrition program staff will meet the required training hours by the end of the current school year.

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

**Finding 9000: Food Safety \*Repeat Finding**

1. The Food Safety Plan for the SFA is for vended meals. The SFA is considered self-preparation and should have a Food Safety Plan that reflects self-preparation.
2. The cook is unaware of the written Food Safety Plan. All nutrition staff employees need to be aware of the Food Safety Plan, have a copy readily available and be trained on Food Safety annually. This is a repeat finding.

**Corrective Action:**

1. Establish a written Food Safety Plan for a self-preparation meal program. A template is available on the Hawaii Child Nutrition Programs website: <http://hcnp.hawaii.gov/overview/nslp/>
2. Implement the Food Safety Plan.
3. Submit to HCNP a copy of the signed Food Safety Plan.
4. Train all nutrition staff on the Food Safety Plan.
5. Submit to HCNP a copy of the training records, including the agenda and sign in sheets.
6. Place copies of the implemented Food Safety Plan in appropriate locations so it is available to all nutrition staff employees.
7. Notify HCNP of the location of the copies of the Food Safety Plan.

*1502. Records maintained for PLE and revenue from nonprogram foods?*

**Finding 9000: Resource Management**

The DOD Fresh total in the Annual Financial Report does not match the amount received from the USDA for SY15-16. This information is provided at the end of the year by HCNP.

**Corrective Action:**

1. Correct the Annual Financial Report and submit a corrected version to HCNP.

*1502. Records maintained for PLE and revenue from nonprogram foods?*

**Finding 9000: Resource Management**

Unallowable costs have been charged to the nonprofit food service account. This is a repeat finding. See the AR Summary report for details.

**Corrective Action:**

1. Remove the unallowable costs from the nonprofit food service account.
2. Describe to HCNP the procedure that will be followed to prevent unallowable costs from being charged to the nonprofit food service account.



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**Kona Pacific (566-PCS)**

79-7595 Mamalahoa Hwy  
Kealahou, HI 96750

**Food Service Contact**

Nutrition Program Coordinator  
(808) 322-4900

Month of Review: January 2017

Date of Onsite Review: February 28, 2017

**Meal Components & Quantities - Kona Pacific (566-PCS)**

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**

The SFA states it provides a vegetarian meal. There is no vegetarian menu and no indication of a vegetarian meal on the production record. This is a separate menu and must be listed as such on the menu and the production record.

**Corrective Action:**

If the SFA is going to continue to offer a vegetarian meal, add it to the menu and submit copies of the menu and production records to HCNP.

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?  
Enter data.

**Finding 9000: Production Records**

The production records do not contain enough specific information. The information on the production record needs to be specific enough for a nutrient analysis to be completed. This includes what was prepared, what was served and what was leftover. The following needs to be on the production records:

1. The specific fruit that is served for both breakfast and lunch, including the size that is purchased or the can size. ("Fruit" is not acceptable.)
2. The specific breakfast cereal served. (Whole Grain Cereal is not acceptable.)
3. The size of the serving utensils needs to be specified, i.e. #8 scoop, 4 oz. spoodle.
4. All condiments and extras must be listed on the production record
5. When lettuce is on the menu, the type needs to be specified.
6. The color of the sweet potatoes needs to be specified.
7. The correct portion size of the grain products needs to be listed
8. Ingredients such as tomato sauce in chili and sloppy joe can be listed and credited toward the meal components.

**Corrective Action:**

Submit to HCNP copies of the production records that match the cycle menus and that have with the required information added.

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?  
Enter data.

**Finding 9000: Production Records**

There is confusion about the use of production records and transport records. Both are being sent to the serving area.

1. The Production Record is used in the kitchen to plan and record all food produced for each meal. In this case, it includes Kona Pacific Charter School and the other schools that get vended meals from the Kona Pacific Public Charter School kitchen. This record should be completed and kept in the kitchen with the cook/manager.
2. A Transport Record should be delivered with the food that is sent to Kona Pacific Public Charter School serving area. A



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sample Transport Record with the required information has been sent to the school to be used.

**Corrective Action:**

1. Clarify with the cook/manager and the NSLP coordinator how the production records and the transport records will be used.
2. Notify HCNP the date when the system was implemented to correctly use production records and transport records.

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

**Finding 9000: Meal Components and Quantities**

The SFA is not meeting the weekly meal pattern for breakfast. The menu is the same every week. It is short 3 grain ounce equivalents for the week.

**Corrective Action:**

1. Correct the breakfast menus. If cereal is on the menu, write the name of the cereal on the menu and the portion that will be served.
2. Complete the USDA certification worksheets.
3. Submit to HCNP copies of the corrected menus and the completed USDA certification worksheets.

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

**Finding 9000: Meal Components and Quantities \*Repeat Finding**

The SFA is not meeting the weekly meal pattern for lunch. Three of the weeks in the Month of Review were entered in the USDA worksheet. The results are as follows:

1. January 9-13, 2017-- short on red/orange vegetable (none for the week) and short ¼ cup vegetable quantity for Tuesday.
2. January 23-27, 2017 –short 1 grain serving for the week.
3. January 30-February 3, 2017—short 3/8 cup dark green vegetable for the week.

This is a repeat finding.

**Corrective Action:**

1. Correct the cycle menus so that they meet the meal pattern requirement using the HCNP menu planning template.
2. Complete the USDA certification worksheets for all lunch menus.
3. Submit to HCNP copies of the corrected menus and the completed USDA certification worksheets.

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

**Finding 9000: Meal Components and Quantities**

Whole grain rich products are not being served. The requirement is for all grains on the menu to be whole grain rich.

1. Labels were provided for “Red Berries” and “Special K” breakfast cereal. These are not whole grain rich.
2. The bun used for the sandwiches is not whole grain rich.
3. Milled brown rice is in the kitchen storage area. This is not a whole grain rich product.

**Corrective Action:**

1. Stop using products that are not whole grain rich for NSLP/SBP.
2. Submit to HCNP copies of the production records that specify the whole grain rich product being used.
3. Submit to HCNP copies of the food labels for the whole grain rich products being served.

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

**Finding 9000: Offer Versus Serve (OVS)**

OVS has not been properly implemented at the school. (It is not required for the grade levels at this school.) The only food item the students are allowed to refuse is the milk.



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**Corrective Action:**

1. Train/retrain nutrition staff on OVS using the powerpoint on the Hawaii Child Nutrition website: <http://hcnp.hawaii.gov/training-resources/> ( National School Lunch Program-Offer Vs Serve Powerpoint)
2. Describe to HCNP how the school will change the meal service so that OVS is being properly followed.
3. Describe to HCNP how the students will be trained on OVS.
4. Submit copies of the training records to HCNP, including the agenda and sign in sheets.

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

**Finding 9000: Signage**

The breakfast menu is not posted in a location near the serving area for students to see. The lunch menu is posted in a location that is not easily seen by the students. This is a repeat finding.

**Corrective Action:**

1. Post the breakfast and lunch menus in a location in the serving area where they are easily seen by the students.
2. Notify HCNP of the date this was completed.

**General Program Compliance - Kona Pacific (566-PCS)**

811. Justice for All poster displayed in prominent location?

**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 where it is visible to recipients of benefits. The Justice for All poster is not posted in the administration area. An 11" by 17" poster must be displayed in a prominent location where program recipients can read the text without obstruction.

**Corrective Action:**

1. Post an 11" by 17" poster in a prominent location where program recipients can read it.
2. Notify HCNP that the poster has been put up in the administrative area.

1403. Food safety plan - written, copy available?

**Finding 9000: Food Safety**

Several observations were made of poor sanitation and poor food handling:

1. Uncovered plates of food are being carried to classrooms in the open air for the meal service and Fresh Fruit and Vegetable Program.
2. Employees and volunteers are using one pair of gloves throughout the time they handled the food and plates. The employees and volunteers were observed opening doors, touching their hair and touching ready to eat foods with the same pair of gloves on.
3. The meals for kindergarten classes are stacked on top of each other without any cover on the food and plates and then carried uncovered to the classroom.
4. On the day of review, in grades 7 and 8 classrooms, the students were observed each using their own fork to eat off of a common "community" plate of melon. The students would re-use the fork to help themselves to more melon after putting the fork in their mouth.

**Corrective Action:**

1. Write correct procedures (or identify the SOPs in the Food Safety Plan) to ensure proper food handling.
2. Train all staff that handle or transport food on proper procedures.
3. Submit to HCNP copies of the procedures.
4. Submit to HCNP copies of the training records, including the agenda and sign in sheets.



1404. Food safety inspection dates?

**Finding 9000: Food Safety**

A copy of the most recent Health Department sanitation inspection was not posted in a publicly visible location. This is a repeat finding.

**Corrective Action:**

Post a copy of the most recent Health Department sanitation inspection in a publicly visible location in the meal service area.

1404. Food safety inspection dates?

**Finding 9000: Food Safety**

The screen on the door to the kitchen is not fastened down and needs to be repaired.

**Corrective Action:**

1. Notify the landlord that the screen needs to be repaired.
2. Submit to HCNP a copy of the request for the repair.
3. Notify HCNP the date the repair was completed.

1407. Temperature logs available?

**Finding 9000: Food Safety**

The temperature log for the refrigerator in the meal service area has been pre-filled in an unacceptable manner (arrows are drawn down the page in 4 columns indicating the information is repeating). A monthly temperature log template is available from HCNP.

**Corrective Action:**

1. Correct the procedure for taking the temperature of the refrigerator in the meal service area so that the information is recorded daily and not ahead of time.
2. Post the temperature log on the refrigerator and ensure a temperature is recorded each school day.
3. Submit to HCNP a copy of the refrigerator temperature log for the months of March and April, 2017.

1408. Storage violations observed, on-site, off-site?

**Finding 9000: Food Safety**

Two refrigerators are being used for both the meal program and the staff. The food for NSLP/SBP should only be accessible to meal program staff and not all school staff.

**Corrective Action:**

1. Clean out the refrigerator in the meal service area and label it for NSLP/SPB only.
2. Use this refrigerator to store NSLP/SBP food only.
3. Do not store NSLP/SBP food in a staff refrigerator.
4. Notify HCNP the date this was implemented.

**Other Federal Programs - Kona Pacific (566-PCS)**

1901. FFVP: Cost documentation support the school's reimbursement claim? Enter data.

**Finding 9000: Resource Management**

The Fresh Fruit and Vegetable (FFVP) reimbursements, \$12, 000, were more than the FFVP expenses of \$10, 000. A review of the FFVP claims for March, 2016 revealed that an invoice for Sustainable Island Products of \$1078.59 was missing.



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**Corrective Action:**

1. Provide a copy of the missing invoice. This has been completed.
2. Correct the general ledger so that all FFVP expenditures are recorded properly.
3. Submit to HCNP a copy of the general ledger showing the corrections.
4. Correct the Annual Financial Report and submit a corrected version to HCNP.