



SNP Administrative Review Findings

Kamalani Academy PCS (1444-3)

Program Year 2018

Kamalani Academy PCS (1444-3) **New SFA**

1403 California Ave
Wahiawa, HI 96786

Food Service Contact

NSLP Coordinator
(808) 622-5457
Vendor: Kama'aina Catering

Executive Contact

Principal
(808) 622-5457

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

Commendations

- * -SFA kitchen facility is clean and orderly.
- Staff was interactive with students during the lunch meal service.
- Staff was attentive, quick to retrieve requested information/documentation, and eager to make corrections as requested.

Suggestions

- * -Consider applying for a POS system using the NSLP Equipment Grant (SY 2018-19)

Technical Assistance

- * TA provided on proper food safety practices and requirement of having a food safety plan. TA also provided on the meal pattern requirements, crediting of menu items, production records, recipes/labels.
- * TA provided on professional standards requirements, meal counting and claiming, meal charge policy, local wellness policy, MC-7 self-monitoring review, food safety plan, sanitation inspection requirements.

Certification and Benefit Issuance - Kamalani Academy PCS (1444-3)

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

Finding 9000: Certification and Benefit Issuance

The following issues were noted during the review of meal applications:

Three students are receiving free meal benefits; however, there is no application or direct certification documentation on file to support this. The SFA used a letter from another SFA where the fourth child in the household is receiving free meals. One application was approved as reduced price, but student was issued free eligibility. One application was approved as free, but should have been reduced price.

Corrective Action:

1. Change the benefit status of the three students to paid status. The family must be given 10 calendar days' notice prior to changing the benefit status. Inform household they have the right to submit a meal application.
2. Submit to HCNP a copy of the notice letter sent to each household.
3. Submit to HCNP a copy of the master list showing the date the benefit status was changed for each error identified above.
4. Submit a copy of POS list to show date eligibility status changed for each student.
5. If the household submitted a new application, submit a copy of the application and an updated copy of the master list.
6. Train all staff with meal application duties on Free and Reduced price meal applications. Submit to HCNP a copy of the training agenda, sign-in sheet, and any training materials used. Training materials can be located on the HCNP website at <http://hcnp.hawaii.gov/training-resources/>.
7. The SFA will be required to conduct an independent review of the applications for SY 2018-19. This requires the confirming official to review all applications before the household is notified of their child's eligibility status. A report is required to be completed and submitted to HCNP.
8. Assure HCNP the SFA will conduct the independent review of applications for SY 18-19 and submit the completed report to HCNP.

Technical Assistance:

For households that have an increase in benefit, the SFA must notify the household and change the benefit status in the POS system within 3 operating days. For households with a decrease in benefits, the SFA must give the household 10 calendar days' notice and change the benefit status on the 11th day



131. *Applications denied incorrectly?*

Finding 9000: Certification and Benefit Issuance

Two students should have been approved for reduced price meals and one student should have been approved for free meals.

Corrective Action:

1. Update each student's benefit status on the master list and point-of-service (POS) list.
2. Notify the households about the change in benefit status.
3. Submit to HCNP a copy of the notification letter sent to each household.
4. Submit to HCNP a copy of the SFA's master list and POS list showing where each student's benefit status has been updated including the date the status was changed.

Verification - Kamalani Academy PCS (1444-3)

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

Finding 9000: Verification

The verification report (FNS-742) contains incorrect information. One of the three verified applications responded with proof of income that indicated a benefit status of reduce-priced meals. Correct the FNS-742 report to show that one of the three applications is 'responded, changed to reduced' status rather than 'no change' status.

Corrective Action:

1. Correct the FNS-742 report on HCNP Systems to show that one of the three applications is 'responded, changed to reduced' status rather than 'no change' status.
2. Provide the date the change is made.

General Program Compliance - Kamalani Academy PCS (1444-3)

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

Finding 9000: Civil Rights

The current nondiscrimination statement is not included on the monthly menu that is distributed to the students. The statement is also not on the school handbook and school website under Lunch Program sections. The nondiscrimination statement used on notification to household about eligibility status is not the most current statement.

The current statement must be included on all program materials with the size of the statement being no smaller than the smallest font on the document/web page.

The Justice for All poster in the kitchen is not visible to the students in the meal service line. The poster was relocated to a more visible location during the on-site review.

The civil rights binder did not include the complaint log, complaint procedures, and a copy of the complaint form. This was completed during the on-site review.

SFA did not complete the Ethnic Data report. The report must be completed by October 31 every year and kept on file for three years plus the current school year.

Corrective Action:

1. Submit a copy of the May 2018 monthly menu that is distributed to students showing that the non-discrimination statement has been added.
2. Assure HCNP that that the non-discrimination statement will be added to the student handbook for SY 2018-19.
3. Add the non-discrimination statement to the school website under the meal program section. Provide the link for the website.
4. Assure HCNP that the SFA will use HCNP's most current version of the notification to household of approval/denial letter.



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5. Complete the Ethnic Data report and submit to HCNP for review.
6. Assure HCNP that the SFA will complete the Ethnic Data report by October 31 every school year. Include who will be responsible for completing the report.

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

Finding 9000: Local Wellness Policy

The LWP is not posted on the school website. Recommend including the LWP in the school handbook.

The SFA is new and has not yet conducted an assessment on the LWP.

Corrective Action:

1. Upload the LWP to the school website. Provide the link to the LWP.
2. Explain to HCNP how the SFA will communicate to the community their ability to participate in future meetings to review the LWP.

1217. Frequency of tracking training hours

Finding 9000: Professional Standards

SFA is not currently tracking each meal program staff member's training hours.

The food service director did not meet hiring standards. New school nutrition program directors that begin duties after July 1, 2015 must meet the new hiring standards. SFA must seek prior approval from HCNP before hiring an individual that does not meet the minimum hiring standards.

Maile had yet to meet the required training hours for SY 2017-18.

Corrective Action:

1. Nutrition program director completed the required 8 hours of food safety training following the on-site review. Certificate of completion submitted via email. No further corrective action.
2. Assure HCNP that the SFA will seek prior approval before hiring an individual for the meal program director position that does not meet the hiring standards.
3. Submit a training plan to show how Maile will meet training requirements by the end of SY 2017-18. If annual training hours have already been met, submit the completed training log.

1500. Reports submitted to State agency as required?

Finding 9000: Recordkeeping

SFA is not timely in submitting requested documents and claims by the due date. A calendar of HCNP due dates was given during the on-site review.

Corrective Action:

Describe to HCNP what process changes will be made to ensure reports are submitted to HCNP by the specified deadlines.



Meal Counting & Claiming - Kamalani Academy PCS (553-PCS)

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

Finding 9000: Meal Counting and Claiming

Meal counts are not totaled accurately. The Edit Check Worksheets are not completed correctly. The SFA is using the averages for each student to complete the Edit Check Worksheet. This is not acceptable. For the month of December, the SFA over claimed 4 free lunches, over claimed 1 reduced price lunch, and under claimed 28 paid lunches. Fiscal action will occur for the over claimed meals.

HCNP suggests using the document provided during the on-site review for meal counting.

Corrective Action:

1. Explain to HCNP the meal counting method the SFA is using. Include in the explanation how the SFA transfers the point-of-service counts to the edit check worksheet.
2. Assure HCNP that a second staff member will review meal counts daily for accuracy.
3. Submit to HCNP a week of meal counts along with a copy of the edit check worksheet that corresponds with the meal counts in May.

Meal Components & Quantities - Kamalani Academy PCS (553-PCS)

400. DOR – all required components available during entire meal service, all lines? Enter data.

Finding 9000: Meal Components and Quantities – Day of Review

The following issues were noted on the day of review – January 30, 2018:

- The elbow macaroni is not whole grain rich.
- The vendor served two rolls. The original menu was for one roll. The production record credited the rolls as 2 oz. One roll is equivalent to 1.5 oz.; therefore two rolls should credit as 3 oz.
- The serving size of the elbow macaroni was not included on the production record.
- The salad is not credited correctly on the production record. A ½ cup of salad credits as ¼ cup.
- The broccoli is credited as ¼ cup on the production record. Only one piece of broccoli was served with the salad. This amount is not enough to credit towards the meal pattern.
- The production record listed 3/8 cup of ‘vegetables’. The vendor stated the ‘vegetables’ he is crediting is the tomatoes, tomato paste, and onions in the macaroni recipe.
- The menu is short 1/8 cup of vegetable.

*Since the on-site review, the vendor stopped providing meals to the SFA. The SFA will have a new vendor (Marian’s Catering) starting April 2, 2018.

Corrective Action:

1. Assure HCNP that the SFA will oversee that the new Vendor is meeting the USDA NSLP meal pattern requirements.

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

Finding 9000: Production Records

Production records are not completed in their entirety. The amount needed, serving utensil, total servings prepared, time the temperature was taken, cooking or holding temperature, and leftovers are not documented.



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There seems to be substitutions made on a regular basis. Reviewer understands that substitutions will occur; however the vendor should follow the menu as closely as possible or change the menu to a product that is available on a more consistent basis.

SFA is documenting substitutions on the production record. The vendor should be the one to note the substitutions and include the portion size, etc. on the production record.

The crediting of the menu items on the production record does not always match the label or recipe. The following items were noted to be credited incorrectly:

- 12/1/17 – The cole slaw is credited as both $\frac{3}{4}$ cup and $\frac{1}{2}$ cup. This occurred several times throughout the month. Vendor must update the production record with the correct serving size and creditable amount.
- 12/4/17 – The hapa rice is credited as both 1 oz. and 2 oz. This occurred several times throughout the month. Vendor must update the production record with the correct serving size and creditable amount.
- 12/7/17 – Both the serving size and creditable amount of the romaine salad is $\frac{1}{2}$ cup. Raw, leafy greens credit as half the volume served.
- 12/11/17 – Whole wheat buns are credited as both 1.5 oz. and 1 oz. After receiving the bun label while on-site, the bun credits as 2 oz. Green beans are substituted on the production record for corn. The monthly menu includes corn. Production record template should be updated with the correct menu item.
- 12/15/17 – Green peas and carrots must be credited separately since they are in two different vegetable subgroups (starchy and red/orange, respectively). If the product comes with peas and carrots mixed together, the vendor must contact the manufacture to obtain the ratio of peas and carrots in a single serving. If this information cannot be obtained, the vendor may either credit the vegetables towards the total amount of vegetables for the week (may not credit towards any of the subgroups) or purchase each vegetable separately to add to the recipe so that the vendor may credit the accurate amount per serving.

The vendor stated that he does not always serve the portions listed on the production record. The production record must reflect what is served.

Corrective Action:

1. Assure HCNP that the vendor will follow a cycle menu.
2. Assure HCNP that the vendor will document substitutions on the production record.
3. Train meal program staff as well as vendor on completing production records. Submit to HCNP the agenda, sign-in sheet, and any training materials used. HCNP's production record template and training materials can be located on the HCNP website - <http://hcnp.hawaii.gov/>.
4. Submit one week of completed production records in May.

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 noted during the week of review – December 11-15, 2017:

- The daily vegetable requirement was not met on 12/12/17 and 12/13/17.
 - o On 12/12/17, the romaine and broccoli salad is marked through and the comment “didn’t have” is written out to the side. Diced carrots are listed in the Meat/Meat Alternate section of the production record; however, no further information is included for the carrots. The reviewer is unable to distinguish if a vegetable was served on this day.
 - o On 12/13/17, diced carrots are listed on the production record but are marked through. Mashed potatoes are listed in the grain section of the production record. Potatoes credit only as a vegetable and not as a grain. The serving size of $\frac{1}{2}$ cup of potatoes was credited towards the meal pattern. This is less than the $\frac{3}{4}$ cup requirement.
- The weekly vegetable subgroup requirements were not met:
 - o The menu is short $\frac{1}{2}$ cup of dark green vegetables.
 - o The menu is short $\frac{1}{2}$ cup of red/orange vegetables.
 - o The menu is short $\frac{1}{2}$ cup of other vegetables.
- The reviewer is unable to verify the crediting of the following entree due to the recipe not being submitted: Mushroom Chicken
- The reviewer is unable to verify if the whole grain rich requirement is being met for the hamburger bun. The vendor must



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contact the vendor to inquire about the ingredients of the bun.

The week of review did not meet the meal pattern requirements; therefore the review period was expanded to the entire month of December. The following issues were noted during the week of December 4-8, 2018:

- The daily vegetable requirement was not met on 12/6/17 and 12/7/17.
 - o On 12/6/17, ¼ cup of cabbage and ¼ cup of cucumber is served. This is less than the requirement of ¾ cup.
 - o On 12/7/17, ½ cup of romaine is served. Raw, leafy greens credit at half the volume served; therefore, the romaine credits as ¼ cup. This is less than the ¾ cup requirement.
- The weekly vegetable requirement was not met. The week was short 1/8 cup of vegetables.
- The whole grain rich requirement was not met. The following items are not whole grain rich:
 - o Spaghetti noodles
 - o Elbow macaroni
 - o Pizza crust – label was never submitted. Vendor stated crust is not whole grain.

*Since the on-site review, the vendor stopped providing meals to the SFA. The SFA will have a new vendor (Marian's Catering) starting April 2, 2018.

Corrective Action:

1. Submit to HCNP the cycle menu (with portion sizes, crediting amounts, and labels) that Marian's Catering is using to serve the students.
2. Submit to HCNP production record templates for each day of the cycle menu.
3. Submit to HCNP labels and recipes that correspond with the cycle menu.

General Program Compliance - Kamalani Academy PCS (553-PCS)

1405. Food safety inspection dates?

Finding 9000: Food Safety - SFA

SFA has not requested two sanitation inspections for the current school year. The sanitation inspection request form was completed and mailed during the on-site review. SFA submitted sanitation inspection report following the on-site review. No further corrective action required.

Food safety plan is incomplete. Standard operating procedures (SOP) were printed but were not signed as implemented.

Corrective Action:

1. Complete the food safety plan with information specific to Kamalani Academy.
2. Sign and implement SOPs and combine with food safety plan. Assure HCNP that the food safety plan will be kept in the kitchen so that kitchen staff may refer to plan as needed.
3. Submit to HCNP the completed food safety plan and SOPs.
4. All meal program staff must be trained on food safety at least once a school year. Train meal program staff on the SOPs. Keep record of the training in the food safety binder. Submit to HCNP a copy of the training sign-in sheet.
5. Assure HCNP the food safety plan will be renewed annually and all appropriate staff will be trained, with annual documentation.

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

Finding 9000: Food Safety - Vendor

The following food safety issues were noted at the vendor's facility:

- Scoops are left in the flour, sugar, and salt bins. This is considered cross-contamination. Scoops must be stored outside of the bins.
- A bug was found in the rice bin. Vendor is to throw away rice and purchase a new lid for the bin that is not cracked.
- Several items were found in the freezer, refrigerator, and condiments shelf to be expired:
 - o Tortillas (12/2017)
 - o Hummus (2017)



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- o Mozzarella Cheese (4/2017)
- o Milk Carton (1/5/2018)
- o Blue Cheese (1/16/18)
- o Sriracha Mayonnaise (11/2017)
- o Olives (9/2016)
- o Unlabeled items in freezer dated 2016
 - Items on the condiment shelf had a layer of dirt and dust on the lids. Several condiment bottles were sticky.
 - An open bottle of Dijon mustard was stored on the condiment shelf rather than stored in the refrigerator.
 - Mayonnaise containers are reused to store other food items. This is unacceptable.
 - Thermometers are not kept inside of the refrigerators and freezers. Temperature logs are not maintained.
 - In the freezer, boxes are stacked in a way that is blocking the fan. The fan must not be blocked.
 - Rice and flour were found sitting on the floor. All food items must be stored at least 6 inches off the floor.
 - The vendor did not have a food safety plan. The vendor must have a food safety plan.
 - The vendor stated that his employees are only trained on food safety when they are hired. Staff must be trained on food safety at least once annually. Training must be documented and kept on file for 3 years plus the current school year.
 - The vendor was not including the time the temperature was taken of the food items. It was discovered that the food is pulled from the warmer to package around 8:30 each morning. Based on this time, meals must be consumed by 12:30pm.
 - It was noted during the review that the canned pineapple is packed in heavy syrup. Fruit must be packed in light syrup, juice, or water.

*Since the on-site review, the vendor stopped providing meals to the SFA. The SFA will have a new vendor (Marian's Catering) starting April 2, 2018.

Corrective Action:

1. Conduct an on-site review of Marian's Catering. Ensure that the new vendor implements proper food safety practices. Explain to HCNP the results/findings of the on-site review.
2. Assure HCNP that the vendor has established and implemented a food safety plan.
3. Explain to HCNP how often the vendor conducts food safety training.