



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

*Program Year 2019*

#### DOE School Food Services Branch (1434-6)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

No. of Sites / Reviewed: 265 / 21

Month of Review: October 2018

#### Commendations

\* Sponsor: Meal Applications

- For the high volume of applications that the SFA processes, the SFA does a good job with the processing of free and reduced price applications.

#### Technical Assistance

\* Sponsor: Carryover Period

- Explained to Albert that the 30-day carryover is thirty operating days, not 30 calendar days.

\* Sponsor: Direct Certification

- SFSB's benefit issuance system does not identify students who are directly certified for SNAP/TANF on reports. The SFA stated that they are working with the current vendor to ensure the DC SNAP/TANF is easily identified when reports are run.

\* Sponsor: Smart Snacks

- Schools are to follow BOE Policy 103-7 from the start of the school day till the end of the school day. BOE Policy 103-7 Food Sales allow the sale of food prepared by culinary arts classes as part of their educational program. There is no mention that the Smart Snacks requirements must be met. Albert stated that SFSB is in the process of getting the policy updated to reflect the most current USDA policies.

- Provided the Smart Snacks Hawaii Exemption Policy to SFSB. Albert stated that he will be working on an official communication that will be sent to the schools regarding the exemption.

\* Sponsor: Local Wellness Policy

- The Hawaii DOE Wellness Chart states, "If participating in USDA's afterschool snack program, end of school day is 30 minutes after snacks are served." Albert clarified that this is a SFSB rule. It was "based on the Wellness Guidelines of March 2017, which was based on the interpretation of SP 23-2014 (V. 3) and has been in place since the end of 2016." Explained to Albert that the school day does not include the Afterschool Snack Program. SP 23-2014 (V. 3) states, "How does this rule impact schools that also participate in the NSLP afterschool snack program or any part of the Child and Adult Care Food Program (CACFP)? The Smart Snacks standards are applicable during the school day, which is defined as the midnight before to 30 minutes after the end of the instructional day. If such programs are operated in the school during the school day, or if afterschool snacks or meals are provided within the 30 minute window after the end of the instructional day, any other food available for sale to students at that time must comply with the Smart Snacks requirements."



Suggestions

\* Sponsor: Meal Pattern Requirements

• To help make it easier to ensure compliance with the meal pattern requirements, consider not counting the vegetables in the entrée and serve vegetables on the side in ¼ cup or ½ cup portions. For example, if pizza is served, do not count the 1/8 cup of pizza sauce toward the vegetable requirement. Plan a total of ¾ cup of vegetables (1/2 cup + ¼ cup) on the side for K-8 or 1 cup of vegetables ( ½ cup + ½ cup) for 9-12.

\* Sponsor: Cycle Menu

Recommend cycle menu be posted on SFSB’s website.

\* Sponsor: Website

• SFSB should have their own website where the public can easily find it and find necessary information (meal charge policy, free and reduced price meal application and link to the online application, wellness policy, menu, how to contact SFSB, information on meal accommodations, etc.)

\* Sponsor: Local Wellness Policy

• DOE Wellness Policy contains numerous links to additional information – eliminate the links. Include the information in the links in the wellness policy so that the wellness policy is in one place in its entirety.  
• Recommend using the Alliance for a Healthier Generation Model Wellness Policy as a guide that DOE can customize. The model wellness policy is available at:  
<https://hcnp.hawaii.gov/wp-content/uploads/2019/09/AHG-Model-Wellness-Policy-2.docx>

\* Sponsor: Direct Certification

Highly recommend SFA increase the frequency of the Direct certification import to weekly instead of twice a month.

Certification and Benefit Issuance - DOE School Food Services Branch (1434-6)

123. On-site observation validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions?

**Finding 9000: Certification and Benefit Issuance - Direct Certification**

SFA's benefit issuance system identifies students who are directly certified foster, directly certified migrant, and directly certified homeless; it does not identify students who are directly certified SNAP/TANF. Albert Scales said on 11/27/18 via email, "SFSB is working with its current vendor to ensure that DC SNAP/TANF is easily identified when reports are run"

SFSB staff process applications that are submitted even though the students were directly certified. Staff stated that they cannot tell from eTrition whether the school printed out and distributed the direct certification letters to the households. Per the USDA Eligibility Manual for School meals, page 64, "As stated at 7 CFR 245.6(b), if a household submits an application for directly certified children, the direct certification eligibility determination will take precedence. If a match is found, the application is disregarded and all children in the household are categorically eligible for free meals through the direct certification process. Any application disregarded because all children in the household were determined categorically eligible through direct certification must be retained and the date of disregard must be documented."



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**Corrective Action:**

1. Provide documentation to show SFSB's benefit issuance system identifies students who are directly certified via SNAP and TANF.

2. Explain how SFSB resolved the issue with not knowing if the school printed out and distributed direct certification letters to households because the application is to be disregarded when the children are directly certified.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Certification and Benefit Issuance - Eligibility Start Date**

There were numerous issues found with the eligibility start date of applications. It appears the SFA tried to use the flexibility in determining the effective date of eligibility. However, the SFA is not using the flexibility correctly and is not being consistent for all children in all schools and did not inform HCNP that they were using this flexibility. The following is stated in the Eligibility Manual for School Meals, July 18, 2017, on page 53:

**“Flexibility in Determining Effective Date of Eligibility**

Children are eligible for free or reduced price meal benefits on the date their eligibility is determined; however, flexibility exists to allow LEAs to move the effective date of eligibility to an earlier date under certain circumstances. This applies to both traditional household applications and direct certification. An LEA electing to exercise this flexibility must notify its State agency. LEAs using this flexibility must do so consistently for all children, in all schools.

o Flexibility for Household Applications: LEAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves the application. This flexibility applies only to complete applications containing all required information at the time of submission. LEAs may use this flexibility when processing household income applications, as well as when waiting for documentation of other source categorical eligibility (e.g., for homeless or migrant children) indicated on a household application. See SP 11-2014: Effective Date of Free or Reduced Price Meal Eligibility Determinations, <http://www.fns.usda.gov/effective-date-free-or-reduced-price-meal-eligibility-determinations>.

o Flexibility in Data Matching: LEAs using automated data matching may establish the effective date of eligibility as the date of the automated data matching (or benefit recipient file from another agency) which first identifies the child as eligible for direct certification, rather than the date the LEA accesses and processes the automated data matching file into the local point of service system. To be used for this purpose, the data file must be generated and received by the LEA in the current school year. See SP 51-2014: Eligibility Effective Date for Directly Certified Students, <http://www.fns.usda.gov/eligibility-effective-date-directly-certified-students>.”

The following are issues found with the eligibility start date:

- There were students who were directly certified, but the eligibility start date was not the same as the DC match date. The SFA does the DC import twice a month, on the 1st and the 16th. When the import is done on the 1st, the SFA entered the start date as the 16th of the previous month. When the import is done on the 16th, the SFA entered the start date as the 1st of the month. This resulted in students whose eligibility start date was either before or after the DC match date. For example, a student was matched on 10/2/18 but the student’s eligibility start date was 10/1/18. The prior status of the student was paid.



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- For online applications, the SFA staff explained that the eligibility start date is the date the parent signed the application. If there is a reduction in benefit, the eligibility start date is the day after the parent signed the application. If there is a gain in benefit, the eligibility start date is the same day as the parent signed the application. While reviewing the applications, HCNP noted that the eligibility start date for an application that resulted in a reduction in benefit did not begin the day after the parent submitted the application, as explained by the SFA staff on the procedure that they followed. Application #73904: the parent submitted the application on 8/27/18. The calculated date was 9/1/18 and the eligibility start date was 9/2/18. The eligibility start date is not being consistently assigned the same way (the eligibility start date did not begin the day after the parent submitted the application). SFSB staff explained that during the beginning of the school year, they were told to stop backdating the eligibility start date to the day after the parent submitted the application but to instead start the eligibility the day after the application was approved.

Per the Eligibility Manual, July 18, 2017, page 57:

“All currently certified households for whom benefits are to be reduced or terminated must be given 10 calendar days’ written notice of the change prior to the date the change will go into effect [7 CFR 245.6a(j)]. The first day of the advance notice period is the day the notice is sent.”

- Application #67326: the DC match date was 7/1/18. The parent submitted an online application on 8/9/18, but the eligibility start date is 8/18/18. The SFA stated that this application was not backdated to the signed online submission date due to no change in status (Free to Free).
- Migrant students: the July 2018 Migrant Education Students Listing was emailed to SFSB on 7/23/18. The print date on the file was 7/20/18. SFSB staff stated that the eligibility start date for these students were backdated to 7/1/18. Add a column to migrant student list “Eligibility Date” so SFSB knows when to start the eligibility. Also, include page numbers on the list and a signature line on each page for the Migrant Administrator to confirm that the student list is accurate.
- Homeless student: the Homeless Student listing was dated 9/19/18. The family submitted an application on 9/20/18. The eligibility start date was backdated to 8/9/18. SFSB could not find a reason for the backdating. However, SFSB stated that the student had a carryover status (free) from SY 17-18 until 9/18/18 (30-day carryover period), therefore the student would have been free anyway.



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#### Corrective Action:

1. Read the "Processing Applications" section of the USDA Eligibility Manual for School Meals on pages 50-59.
2. SFSB must determine whether or not they will implement the "Flexibility in Determining Effective Date of Eligibility" for household applications and data matching (direct certification). Explain to HCNP what SFSB's decision is.
3. If SFSB would like to implement the flexibility, SFSB must notify HCNP in writing prior to the start of the school year. Implement the flexibility consistently for all children in all schools. Create a standard operating procedure (SOP) on the procedures for implementing the flexibility, including addressing items as described in SP 11-2014 Effective Date of Free or Reduced Price Meal Eligibility Determinations and SP 51-2014 Eligibility Effective Date for Directly Certified Students.
4. If SFSB does not want to implement the flexibility, create an SOP on the eligibility start date for household applications and direct certification. Specify the start date when there is a gain in benefit versus a reduction in benefit.
5. Submit the SOP.
6. Train all appropriate staff on the SOP implemented by SFSB.
7. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

##### Finding 9000: Certification and Benefit Issuance - Household Members

The following issues were found with applications in which the number of names listed on the application did not match the total number of household members. SFSB said these were a "system issue".

Application #60232: The "EZMealApp Applications, Application Details" lists 7 household member names. The online application lists 8 household member names, but shows that the "Total Household Members (Children and Adults)" is only 7 individuals. It was noted that two of the names listed are similar (Filisione vs Filisone), which may have caused the discrepancy. SFSB stated that the error was fixed, however could not explain why this occurred. It should also be noted that in this case, the difference between 7 and 8 household members would have affected the eligibility status (reduced versus free). SFSB provided documentation to show that there are only 7 household members (5 children and 2 adults). SFSB's response during the Administrative Review was eTriton corrected the issue for this application. Adam Hansen from Harris Tech Support stated on 12/15/18, "At this point I am unable to identify how the situation occurred."

Application #76447: four names (one child and three adults) are listed on the online application, but the total number of household members is listed as 5. SFSB provided a document, "EZMealApp Applications Application Details" that listed two students: Leandro Juan, Jr. and Leandro Juan, III. The online application system does not recognize these students as two different students.

SFSB's response during the Administrative Review was eTriton corrected the issue for this application. Adam Hansen from Harris Tech Support stated on 12/12/18, "An enhancement has been submitted, if two patrons with the same name are on the same application, they will each be listed on the Application Form. This will be included on a future update." For this application, the eligibility status would be free with 4 or 5 household members.



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#### Corrective Action:

1. Explain how the SFSB ensured that these issues will no longer continue with the application system.
2. Provide documentation supporting the response to show that the application system was corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### 129. Household notification consistent with Off-site Assessment responses?

#### Finding 9000: Certification and Benefit Issuance - Notification of Eligibility

One of the applications selected for review was not approved within 10 operating days. According to SFSB, 10 operating days starts when SFSB receives the application. SFSB said they have no control over how long schools hold on to applications.

According to 7 CFR 245.6(c)(6)(i), within 10 operating days of receipt of the application:

- An eligibility determination must be made,
- The family must be notified of its status, and
- The status must be implemented.

To help meet the USDA regulation, have the schools submit the applications to SFSB on a daily basis. Include a cover sheet that lists the school name, students' first name, middle initial, last name, and grade level.

#### Corrective Action:

1. Create a standard operating procedure (SOP) that is provided to all schools under SFSB's jurisdiction on the process of sending completed meal applications to SFSB on a daily basis to be in compliance with 7 CFR 245.6(c)(6)(i).
2. Submit the SOP.
3. Train all applicable staff on the SOP.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### 130. Household notification of denied benefits consistent with FNS requirements?



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#### **Finding 9000: Certification and Benefit Issuance - Denied Applications**

For denied applications, the SFA did not give 10 calendar days' written notice.

Per the Eligibility Manual, July 18, 2017, page 57:

"All currently certified households for whom benefits are to be reduced or terminated must be given 10 calendar days' written notice of the change prior to the date the change will go into effect [7 CFR 245.6a(j)]. The first day of the advance notice period is the day the notice is sent."

"A notice of adverse action cannot be provided if the household fails to reapply during the carryover period because eligibility during the carryover period is based on the previous years' eligibility determination. The household has no right to appeal a discontinuation of benefits based on the expiration of the carryover period. LEAs are encouraged to remind families of the end of the carryover period, but may not send a notice of adverse action, as this would confer the right to appeal."

#### **Corrective Action:**

1. Train all appropriate staff who review and approve meal applications that households must receive 10 calendar days' written notice when their benefits are being reduced or terminated as specified in the Eligibility Manual cited above.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*137. Eligibility determination correctly transferred to POS Benefits Issuance document?*



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#### **Finding 9029: The eligibility determination benefit category is not accurately transferred to the benefit issuance document.**

Based on a review of documentation for selected students, certified eligibility is not always transferred correctly to the benefit issuance system (i.e., electronic POS terminal).

Application #85251: the system matched student (Crisologo-Pascua, Jared) with a wrong student of a similar name in a different school and grade level (Pascua, Jared). This resulted in both students receiving the incorrect benefit status from 8/9/18 to 10/23/18.

Crisologo-Pascua, Jared: should have been free, but was receiving reduced from 8/1/18 to 9/19/18, then paid from 9/24/18 to 10/23/18. The student first purchased a meal on 8/13/18, and reverse charges were issued for meals charged to the student's account from 8/13/18 to 10/23/18. To correct the student's eligibility, the SFA stated that a new application (backdated to 10/1/18) was created for this student on 10/23/18 because the original application included siblings and the system does not allow backdating for only one student on the same application.

Pascua, Jared: should have been paid, but was receiving free benefits from 8/1/18 to 10/19/18. The student's status was changed to paid on 10/22/18. The SFA stated that in lieu of sending a letter, the household was contacted over the phone and verbally notified that the child's status would be changed to paid.

This problem could have been prevented if there were other criteria (i.e., school name, grade, DOB) to distinguish students with identical or similar names in the matching process. The SFA stated that the system has a field that allows the parent to select the school name, grade and DOB, however the SFA cannot see this information when reviewing the application. Also, the SFA stated that the Harris system cannot make all fields (i.e. school name) required on the application. SFSB should use additional fields to match (birthdate, school, and address).

#### **Corrective Action:**

1. Implement other criteria (i.e., school name, grade, date of birth, address) in the SFA's system to distinguish students with identical or similar names when matching the student on the application to the student in the POS system to ensure the eligibility status is given to the correct student.
2. Explain in detail the additional criteria that is used to ensure the SFA's system is assigning the eligibility status to the correct student.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### Verification - DOE School Food Services Branch (1434-6)

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





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#### Finding 9000: Verification

The SFA did not provide their verification procedure.

An issue was found with one of the applications that was verified:

One application had an error in the number of household members. The application is not error prone when the correct number of household members is used. The confirmation review was done after the family was notified. The confirmation review should have been done before the family was notified and the official should have caught the error in the household members so that an error prone application could have been selected instead.

#### Corrective Action:

1. Create a standard operating procedure of the the SFA's verification procedure that is in alignment with the USDA regulations (which can be found in the USDA Eligibility Manual: [https://fns-prod.azureedge.us/sites/default/files/cn/SP36\\_CACFP15\\_SFSP11-2017a1.pdf](https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf)).
2. Submit the SOP on the verification procedure.
3. Provide training to all appropriate staff on the SOP.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

## Meal Counting & Claiming - DOE School Food Services Branch (1434-6)

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

#### Finding 9000: Meal Counting and Claiming - Edit Check Worksheet

Numerous issues were found with the Edit Check Worksheets. Per 7 CFR 210.8(a)(3):

(3) Edit checks.

(i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.

• Upon HCNP's request for all Edit Check Worksheets for the month of October 2018, SFSB provided Edit Check Worksheets without the managers' comments. When asked where the managers' comments are, it was explained to HCNP that the managers keep the Edit Check Worksheets and that the School Food Services Supervisors review them during the on-site review. When the Edit Check Worksheet has any asterisks (\*), the meal counts need to be verified and an explanation needs to be provided. It appears there are managers who are not completing the comments section when there are asterisks.

The following schools appear to have comments written by the same person:

- o Maunaloa Elementary
- o Molokai High

The following schools appear to have comments written by the same person:



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- o Barbers Point Elementary
- o Lehua Elementary
- o Leihoku Elementary
- o Manana Elementary
- o Momilani Elementary
- o Nanaikapono Elementary
- o Nanakuli High and Intermediate
- o Waikele Elementary
- o Waipahu Elementary

The following schools appear to have comments written by the same person:

- o Fern Elementary
- o Kaewai Elementary
- o Kaiulani Elementary
- o Kalihi Elementary
- o Kauluwela Elementary
- o Kekaha Elementary – also appears white out was used on original document

The following schools appear to have comments written by the same person:

- o Kaahumanu Elementary
- o Kahala Elementary

• Most of the Edit Check Worksheets used the attendance factor of 95%. However, the following schools used different attendance factor percentages for both SBP and NSLP:

- o Alvah Scott Elementary (93.5%)
- o Ewa Makai Middle (93.5%)
- o Haleiwa Elementary (93.5%)
- o Kalaeloa ALC (used actual %, 80%)
- o Kalaniana'ole Elementary & Intermediate (93%)
- o Keaau High (93%)
- o King Kekaulike High (93.5%)
- o Kipapa Elementary (93.5%)
- o Mililani High (93.5%)
- o Mililani Mauka Elementary (93.5%)
- o Mililani Middle (93.5%)
- o Mililani Uka Elementary (93.5%)
- o Mililani Waena Elementary (93.5%)
- o Waiakea Intermediate (96.2%)
- o Waialua Elementary (93.5%)

• The Edit Check Worksheets for CEP schools show claimed amounts for Free, Reduced and Paid statuses. All students enrolled in CEP schools receive Free benefits and therefore there should be no values for Reduced and Paid statuses. These schools include:

- o Aiea Elementary
- o Blanche Pope Elementary
- o Central Middle
- o Chiefess Kapiolani Elementary



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- o Hana High and Elementary
- o Hilo Union Elementary
- o Honaunau Elementary
- o Hookena Elementary
- o Fern Elementary
- o Kaala Elementary
- o Kaewai Elementary
- o Kahaluu Elementary
- o Kalaniana'ole Elementary and Intermediate
- o Kalihi Elementary
- o Kau High and Pahala Elementary
- o Kauluwela Elementary
- o Kaunakakai Elementary
- o Ke Kula o Ehunuikaimalino
- o Keaau Elementary
- o Keaau High
- o Keaau Middle
- o Keaukaha Elementary
- o Kekaha Elementary
- o Keonepoko Elementary
- o Kilohana Elementary
- o Lanai High and Elementary
- o Leihoku Elementary
- o Linapuni Elementary
- o Maili Elementary
- o Makaha Elementary
- o Maunaloa Elementary
- o Molokai High
- o Molokai Middle
- o Mountain View Elementary
- o Naalehu Elementary
- o Nanaikapono Elementary
- o Nanakuli Elementary
- o Nanakuli High and Intermediate
- o Olomana
- o Pahoa Elementary
- o Pahoa High and Intermediate
- o Palolo Elementary
- o Princess Victoria Kaiulani Elementary
- o Puuhale Elementary
- o Sanford B. Dole Middle
- o Waianae Elementary
- o Waianae High
- o Waianae Intermediate
- o Waimanalo Elementary and Intermediate
- o Waimea Elementary
- o Waipahu Elementary



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o William P. Jarrett Middle

• The Edit Check Worksheet does not match the claim in HCNP Systems:

- o Eleele Elementary (breakfast)
- o Kailua Elementary (breakfast)
- o Makawao Elementary (breakfast)
- o Pearl City High (breakfast)
- o Prince Jonah Kuhio Elementary (breakfast)
- o Aliiolani Elementary (lunch)
- o Palolo Elementary (lunch)
- o Queen Kaahumanu Elementary (lunch)

• The Edit Check Worksheet with managers' comments does not match the claim in HCNP Systems:

- o Abraham Lincoln Elementary (lunch)
- o Keaukaha Elementary (lunch)
- o Kipapa Elementary (lunch)
- o Koko Head Elementary (lunch)
- o Lehua Elementary (lunch)
- o Naalehu Elementary (lunch)
- o Nanaikapono Elementary (breakfast & lunch)
- o Waipahu Elementary (lunch)

• The following Edit Check Worksheets are missing comments:

- o Aiea Elementary (lunch on 10/4/18 paid)
- o Haaheo Elementary (lunch)
- o Hana High & Elementary (breakfast)
- o Hauula Elementary (lunch on 10/31/18)
- o Hokulani Elementary (lunch)
- o Honowai Elementary (lunch)
- o Kahala Elementary (lunch): "See Comment on 1st page" is written, but there are no other pages attached
- o Kalihi Elementary (breakfast)
- o Kalihi Kai Elementary (lunch)
- o Linapuni Elementary (lunch): comments are only written for Reduced claimed. No comments for Free and Paid claimed
- o Molokai High (breakfast)
- o Momilani Elementary: no comment for Reduced claimed (lunch on 10/18/18)
- o Naalehu Elementary (breakfast)
- o Nanakuli Elementary (breakfast)
- o Nanakuli High & Intermediate (breakfast)
- o Queen Kaahumanu Elementary (lunch): comments say "refer to attached note" but there was no note attached.
- o Wahiawa Elementary (lunch): need comments for October 2018. The comments that were provided were for November 2018
- o Waipahu Elementary: missing comment for lunch, 10/31/18

• The comments written on the Edit Check Worksheets are unclear or ambiguous:

- o Chiefess Kapiolani Elementary (lunch): comments only provide total attendance number.
- o Hilo Union Elementary (lunch): on 10/1/18, Reduced claimed flagged, but comments say "CEP School 431". It is also unclear what is meant by "(checkmark symbol) All Reduced students in school with \*". Does this mean that the numbers need



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to be double-checked?

- o Honaunau Elementary (lunch): numbers are written in the Comments section, but it is unclear what these numbers represent.
- o Hookena Elementary (breakfast): only provides total number of absent students
- o Hookena Elementary (lunch): on 10/4/18, "3 Absent" is written under the Comments section. Both Free and Reduced claimed are flagged.
- o Kaewai Elementary (lunch): bottom of the page says "Meals claimed did not go above total attend factor". Numbers are written under the Comments column, but it is unknown what these numbers represent. Example: on 10/1/18, under the Comments column, "Total Attend" is listed as 304.3
- o Kalaniana'ole Elementary and Intermediate (lunch): numbers are written in the Comments section, but it is unknown what these numbers represent.
- o Kau High and Pahala Elementary (lunch): comments only provide total attendance number.
- o Ke Kula o Ehunuikaimalino (breakfast & lunch): comments only provide total attendance number.
- o Keaukaha Elementary: comments only provide total attendance number.
- o Keonepoko Elementary (breakfast): comments only provide total attendance number.
- o Mountain View Elementary (lunch): comments only provide total attendance number.
- o Naalehu Elementary (lunch): comments only provide total attendance number.
- o Pahoa Elementary (lunch): unable to read the comment for Paid claimed on 10/25/18.
- o Pahoa High & Intermediate (lunch): comments only provide total attendance number.
- o Paia Elementary (lunch): the comment that is written is unclear. Reduced claimed is 59. The comments say "58 reduced claim", then "1 monitor", then "59" and "all reduce students present".
- o Palolo Elementary (lunch): comments only provide total attendance number.

- The edit check worksheet for Kalaeloa ALC is incomplete because it is missing 14 days of attendance adjusted eligibles.
- The SFA does not have current Monthly Edit Check Worksheet procedures. The procedures have not been updated to reflect current practices. The SFA no longer has the Edit Check Worksheet (Form SL-6A) Excel template. Albert stated that he is in the process of updating the procedures but is currently going out for bid for a new system. Albert explained that the managers do not need to enter the data. The only thing that the managers manually enter are the comments whenever there is a flag on the Edit Check Worksheet. The procedures state that the managers are to sign and date the Edit Check Worksheet and submit to SFSB by the 5th business day of each month.



### *Program Year 2019*

#### **Corrective Action:**

1. Update the SFA's Monthly Edit Check Worksheet procedures. The procedures must ensure Monthly Edit Check Worksheets are fully completed and completed correctly, which includes the manager documenting in the comments section an explanation for any areas that are flagged on the Edit Check Worksheet prior to the submission of the claim. Specify how managers are to enter their comments (e.g., provide a standardized format for commonly used comments) so the comments address the area(s) that flagged on the Edit Check Worksheet. The SFA must review the Monthly Edit Check Worksheets prior to the submission of the claim to verify the Edit Check Worksheet was completed and that the meal counts are accurate. The documentation must be maintained and be readily available upon request.
2. Submit the updated procedures.
3. Train all applicable staff on the procedures.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



### Program Year 2019

#### **Finding 9000: Unpaid Meal Charge Policy**

The following issues with the Meal Charge Policy were found at the schools selected for review:

##### Ewa Elementary:

- Staff do not understand the school's meal charge policy. One meal clerk stated that students were allowed to charge up to 5 meals if there is no money left in their account. When asked what happens if the student exceeds the 5 meal limit, the meal clerk replied that this has never occurred because students are informed of a low balance far in advance.
- The second meal clerk was asked the same question. The second meal clerk stated that students are allowed to charge a maximum of 10 lunch meals with no money left in their account. The second meal clerk stated that this has never happened, but if it were to occur, the student would not receive a meal and must go to the office for guidance.

##### Mililani High School:

There is no evidence of Unpaid Meal Charge Policy distribution to households. Based on a conversation with the meal clerk, it appears the Unpaid Meal Charge Policy is not being followed. The meal clerk explained that students with a negative balance are allowed to charge one meal per day but there is no limit as to how large the negative balance is allowed to reach.

##### Mililani Middle:

- The meal clerks were not aware of SFSB's meal charge policy. They explained that when students do not have any money in their account, the first meal is always charged. If the students take a second meal, the meal clerk takes the meal away and will not let them charge the second meal.
- No documentation was provided on the distribution of the meal charge policy to school staff.

SFAs must ensure the policy is provided in writing to all households at the start of each school year and to households transferring to the school or school district during the school year. SFAs also must provide the written meal charge policy to all school or SFA-level staff responsible for policy enforcement. This includes school food service professionals responsible for collecting payment for meals at the point of service, staff involved in notifying families of low or negative balances, and staff involved in enforcing any other aspects of the meal charge policy. SFAs also must maintain documentation of the methods used to communicate the policy to households and school or SFA-level staff responsible for policy enforcement. Information on USDA's Unpaid Meal Charge Policy guidance is available at: <https://www.fns.usda.gov/cn/2017-edition-overcoming-unpaid-meal-challenge-proven-strategies-our-nations-schools>



Program Year 2019

**Corrective Action:**

1. Review the USDA's Unpaid Meal Charge Policy guidance.
2. Create a standard operating procedure (SOP) on how SFSB will meet the Unpaid Meal Charge Policy requirements annually. Implementing the Unpaid Meal Charge policy correctly is an area that is reviewed by the SFA every year during the on-site review, under the general areas section of the SFA On-site Review Checklist MC-7 form. The SFA must review the school for compliance with the federal requirements. If there are any issues, the SFA must ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up onsite review to determine that the corrective action resolved the problems.
3. Submit the SOP.
4. Train all appropriate staff on the SOP.
5. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Counting and Claiming - Hilo Hawaiian Language Immersion Program Site**

For the review period (October 2018), the Edit Check Worksheet was incomplete for the Hilo Hawaiian Language Immersion Program site (aka Nawahi site). Based on a conversation with Albert, Micah and Cindy, it was determined that meals for this site are being claimed under both the home school (Hilo High) and the Hilo Hawaiian Language Immersion Program site. Therefore, meals for this site are being double-claimed. Reimbursement for all meals claimed for the Hilo Hawaiian Language Immersion Program site for October 2018 will be taken back.

Since meals were double-claimed for the month of October, the meals claimed for reimbursement were reviewed for this site for the entire school year. HCNP reviewed the information and documentation provided by the SFA and found numerous meal counting errors throughout school year 2018-2019 for the Hilo Hawaiian Language Immersion Program site.

On 11/22/24, SFSB's Accountant stated the following:

"Upon review, I discovered that the claims for August through October were processed incorrectly. Specifically, Nawahi's meal counts were not subtracted from the POS serving line, resulting in over claimed meal counts for those months."

"Additionally, I identified discrepancies in the calculations for November through January:

November: Nawahi's meal counts were subtracted, but the counts were deducted twice for each meal category.

December: Meal counts were subtracted correctly, but 15 free lunches at Hilo High were underreported.

January: The 15 free lunches that were underreported in December were added back."

It is an unacceptable practice for the SFA to overclaim meals in the next month's claim because an underclaim was made to a prior month, and vice versa. The SFA may revise the claim within 60 calendar days of the end of the specified claim month. Each claim submitted for reimbursement must accurately reflect the number of reimbursable meals served to students by eligibility status for that claim month.

Based on the review of information and documentation provided by the SFA for the meals that were claimed for the Hilo Hawaiian Language Immersion Program site in school year 2018-2019, fiscal action will be taken on the following meal





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counting and claiming errors:

##### August 2018

Breakfast: overclaimed 189 free meals; underclaimed 1 reduced price meal; underclaimed 8 paid meals.

Lunch: overclaimed 505 free meals; underclaimed 5 reduced price meals; underclaimed 31 paid meals.

##### September 2018

Breakfast: overclaimed 244 free meals; overclaimed 3 reduced price meals; overclaimed 47 paid meals.

Lunch: overclaimed 516 free meals; overclaimed 23 reduced price meals; overclaimed 123 paid meals.

##### October 2018:

Breakfast: overclaimed 161 free meals; overclaimed 21 reduced price meals; overclaimed 82 paid meals.

Lunch: overclaimed 269 free meals; overclaimed 44 reduced price meals; overclaimed 218 paid meals.

##### November 2018:

Breakfast: underclaimed 134 free meals; underclaimed 14 reduced price meals; underclaimed 88 paid meals.

Lunch: underclaimed 266 free meals; underclaimed 48 reduced price meals; underclaimed 250 paid meals.

##### December 2018:

Lunch: underclaimed 15 free meals.

##### January 2019:

Lunch: overclaimed 15 free meals.

#### Corrective Action:

1. Each claim for reimbursement must be accurate. Immediately stop adjusting the next claim month when an error is found with a prior claim month. When a claim needs to be revised, revise the claim in HCNP Systems within 60 calendar days of the end of the specified claim month. Include this step in SFBSB's standard operating procedure on processing claims. Submit the SOP.
2. HCNP highly recommends claiming meals under the student's home school instead of having a separate site (such as the Hilo Hawaiian Language Immersion Program and ALC/ILCs) to help prevent future meal counting errors due to double claiming meals and not deducting the correct number of meals. Revisions will need to be made to SFBSB's site application to correctly reflect the corrective action taken to resolve this issue.
3. Create a standard operating procedure (SOP) that specifies the process that will be followed so all appropriate staff at the SFA level and school level understand how to implement the change to ensure the correct number of meals are claimed for reimbursement at the student's home school.
4. Submit the SOP.
5. Train all appropriate staff on the SOP implemented by SFBSB.
6. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

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



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

For the review period (October 2018), there are differences between the SFA's claim and the State Agency's validated counts for breakfast and lunch for one or more schools. The SFA is not consolidating meal claims correctly. The Edit Check Worksheets provided by the SFA does not support the claim for reimbursement for the following schools:

- o Eleele Elementary (breakfast): underclaimed 1 free; overclaimed 1 reduced
- o Kailua Elementary (breakfast): underclaimed 5 free; overclaimed 5 paid
- o Makawao Elementary (breakfast): underclaimed 1 free; overclaimed 1 paid
- o Pearl City High (breakfast): underclaimed 1 free; overclaimed 1 paid
- o Prince Jonah Kuhio Elementary (breakfast); underclaimed 5 paid
- o Aliiolani Elementary (lunch): overclaimed 1 reduced; underclaimed 1 paid
- o Palolo Elementary (lunch): underclaimed 1 free
- o Queen Kaahumanu Elementary (lunch): oveclaimed 2 free; underclaimed 2 paid

Fiscal action will be taken back on these meal counting errors.

#### **Corrective Action:**

1. Create a standard operating procedure (SOP) on reviewing the Edit Check Worksheets and ensuring the correct number of meals are claimed for reimbursement in the SFA's claim. Include in the SOP what appropriate corrective actions will be taken when errors are found.
2. Submit the SOP.
3. Train all applicable staff on the SOP.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

### General Program Compliance - DOE School Food Services Branch (1434-6)

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



**Program Year 2019**

**Finding 9000: Civil Rights - Complaint Log**

SFSB does not maintain their Civil Rights Complaint Log. The following issues were found:

There is no information before the School Year 2017-18.

The Civil Rights Complaint Log for the School Year 2017-18 is incorrect. There is a hand written notation on the 2017-18 page stating "No complaints for SY 2017-18". This statement is incorrect. HCNP has records of Civil Rights complaints during that school year.

The Civil Rights Complaint Log for School Year 2018-2019 is incomplete. A Civil Rights complaint was previously brought to the attention of HCNP for the current school year, but it was not logged on the SFSB Civil Rights Complaint Log. This was corrected onsite.

There is a deficiency in SFSB's handling of Civil Rights complaints. An HCNP CACFP Program Specialist inquired with SFSB in regards to a reported Civil Rights complaint. The response provided by SFSB was inadequate. SFSB could not provide written procedures for handling Civil Rights complaints, and could not provide invoices to report the financial expenses incurred in relation to this complaint.

**Corrective Action:**

1. SFSB must maintain the Civil Rights Complaint Log annually by having a complaint log for each school year, even if there are no civil rights complaints. If no civil rights complaints are received in a school year, make a note on the complaint log that there were no civil rights complaints. If there are any civil rights complaints received during the school year, it must be documented on the complaint log.
2. Train all SFA staff on the SFA's civil rights complaint procedures.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with all staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Civil Rights - Press Release**

The press release was not provided by the SFA. As required at 7 CFR 245.5(a), near the beginning of each school year the public must be notified that free and reduced price meals and free milk are available. This notice must include the eligibility criteria for free and reduced price meals or free milk. The public notice must be provided to the local news media, the unemployment office, and any major employers contemplating large layoffs in the attendance area of the school [7 CFR 245.5(a)(2)].

**Corrective Action:**

Submit documentation that shows SFSB did a press release and that it was provided to the local news media, the unemployment office, and any major employers contemplating large layoffs in the attendance area of the school.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



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

**Finding 9000: Civil Rights - Training**

It appears not all appropriate staff were trained in Civil Rights. SFSB must track and compile a list of the employees that did not attend SFSB's Civil Rights training and provide opportunities to receive Civil Rights training. SFSB must ensure all appropriate staff are trained on Civil Rights annually and maintain all training documentation.

- a. 19 of the 20 office staff attended the Civil Rights training within the SFSB office on 7/31/18 and/or 8/1/18. The Director did not attend the training.
- b. 29 of the 363 employees did not attend the Free and Reduced Meal Benefits Application Instructional Sessions in the summer of 2018.
- c. 40 in-house employees and 119 employees via the web were trained on the Cashier Training and Civil Rights. This number is much less than the number of cashiers in the 265+ school cafeterias. In addition, there is no documentation that there were 119 employees online during the training.
- d. 64 of 115 did not attend SFSB Meal Count Asst. training in August. SFSB should investigate the reason why there was low participation in this training since it includes important and vital information such as Civil Rights and Meal Counting.

**Corrective Action:**

1. Create a standard operating procedure (SOP) on how SFSB will ensure all SFA level staff and appropriate school level staff are trained on Civil Rights annually. Maintain a master list of all SFA level staff and school level staff who must receive Civil Rights training annually. Designate staff to keep the master list current, document the date training was completed for each staff, and ensure all staff complete Civil Rights training annually.
  2. Create a training plan to have multiple opportunities for SFA level staff and school level staff to complete the Civil Rights training in a timely manner for those who were not able to attend the initial Civil Rights training opportunity.
  3. When conducting training virtually, such as a webinar, take attendance at the start of the training and at the end of the training as a way to confirm that they attended the entire webinar. Maintain documentation of those who were in attendance for each training with SFSB's training records.
  4. Submit the SOP, training plan, and training documentation to show all staff were trained on Civil Rights.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

810. *Non-discrimination on appropriate Program materials?*



### Program Year 2019

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

All program materials must use the most current nondiscrimination statement. The following issues were noted with the nondiscrimination statement on program materials:

- o SFSB's Discrimination Complaint Form (Attachment H-1) provided by Albert does not contain the nondiscrimination statement.
- o SFSB's Accommodating Children with Special Dietary Needs in School Nutrition Programs (Attachment J) does not have the correct nondiscrimination statement. Also, it was noted under the references that the most current guidance from USDA was not used. The reference cited is the 2001 guidance. USDA released a new guidance in 2017, Accommodating Children with Disabilities in School Meal Programs.
- o Notification of Approval/Denial Letter and Direct Certification Letter: the nondiscrimination statement needs to be corrected.

The following changes need to be made:

- ? "largeprint" must be changed to "large print"
- ? "AmericanSign" must be changed to "American Sign"
- ? Add the numbering (1, 2, 3) so it reads:

(1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

o School Food Services Non-Discrimination Procedures: the bottom of the first page states, "USDA is an equal opportunity provider and employer". This statement is incorrect. The incorrect statement is also included in the training materials. The current short version of the nondiscrimination statement is, "This institution is an equal opportunity provider." Also, the long version of the nondiscrimination statement in the training material is incorrect.

#### Corrective Action:

1. Use the most current nondiscrimination statement on all program materials. The current nondiscrimination statement is available at: <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>. Review the document. The full statement is everything listed in the large box on the document.

2. Provide documentation demonstrating the corrections were made to the program materials.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



### Program Year 2019

#### Finding 9000: Local Wellness Policy

The following issues were found with the Local Wellness Policy from the SFA:

- Wellness Leadership: the wellness policy does not include the name and title of the school official(s) responsible to ensure each school complies with the policy.
- Public Involvement: add information on efforts to review and update the wellness policy, who is involved, and how stakeholders are aware of their ability to participate.
- The Nutrition Guidelines refer to follow Board Policy 103-7 Food Sales. Board Policy 103-7 includes the sale of “food prepared by culinary arts classes as part of their educational program.” There is no mention that food prepared and sold by the culinary arts classes to students must meet the USDA Smart Snacks standards as specified by USDA SP 40-2014 Smart Snacks Nutrition Standards and Culinary Education Programs: <https://fns-prod.azureedge.us/sites/default/files/cn/SP40-2014os.pdf>.  
Board Policy 103-7 also specifies that, “Beverage selections from school vending machines that are available to students shall contain only healthy beverages as deemed appropriate by the Department of Education. Beverages, other than water, shall not be sold during meal serving periods.” This is confusing – one is using the term only healthy beverages deemed appropriate by the Department of Education and the other specifies only water shall be sold.
- The wellness policy includes a number of links that must be clicked on to find the required information. Include descriptive verbiage in the policy to better explain what will be in the links for the following:
  - o Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for:
    - School meal nutrition standards, and the
    - Smart Snacks in School nutrition standards.
  - o Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).



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**Corrective Action:**

1. Establish wellness policy leadership in the Local Wellness Policy of one or more SFA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy.
2. To meet the public involvement requirement, in the wellness policy, add information on efforts to review and update the wellness policy, who is involved, and how stakeholders are aware of their ability to participate.
3. Read SP 40-2014 Smart Snacks Nutrition Standards and Culinary Education Programs and the USDA's A Guide to Smart Snacks in School: <https://fns-prod.azureedge.us/sites/default/files/resource-files/smartsnacks.pdf>. Review and revise Board Policy 103-7 Food Sales so that it is in alignment with the USDA Smart Snacks Standards and so it is clear what beverages can and cannot be sold at school to students.
4. Include descriptive verbiage in the wellness policy to better explain what will be in each of the numerous links for the following:
  - o Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for:
    - School meal nutrition standards, and the
    - Smart Snacks in School nutrition standards.
  - o Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).
5. Submit the revised revised wellness policy and on the revised wellness policy and the Board Policy 103-7 Food Sales.
6. Update the DOE website with the revised wellness policy and Board Policy 103-7 Food Sales. Provide the two links to HCNP to access the two policies.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Local Wellness Policy (School Level)**

The following issues with the Local Wellness Policy were found at the schools selected for review:

Washington Middle:

The school is making progress towards becoming a Blue Zones school and has offered numerous activities throughout the school year to support the school's wellness goals. However, the current wellness policy does not meet USDA guidelines in the following ways:

- The wellness policy does not explicitly permit participation by the general public and school community. USDA guidelines for the Local Wellness Policy require that the school permit participation by the general public in the wellness policy process.
- Reminder: the school must conduct a review of the wellness policy every 3 years, at a minimum. The wellness policy, including any updates and assessments, must be made available to the public on an annual basis.

Chiefess Kamakaha Middle:

School does not have a Local Wellness Policy. Wellness Policy should contain specific, measurable nutrition and physical activity-related goals for students. A committee list, as well as the last committee meeting (1/23/18), was provided. School did not provide evidence that the public was notified about their ability to participate in revising the Policy.

Model policies can be found at <http://teammnutrition.usda.gov/healthy/wellnesspolicy.html>

Aliamanu Elementary:



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The wellness guidelines that were provided do not meet USDA requirements. Per USDA regulations, the local wellness policy must permit participation by the general public and school community in the wellness policy process. The wellness policy, including any updates to and about the policy, as well as progress towards meeting the goals of the policy, must be made available to the public. The "Wellness Update" that was provided was not dated and therefore it cannot be determined when this update was completed.

The school holds multiple fundraising events throughout the school year during the school day, many of which include the sale of food items. This is not in compliance with BOE Policy 103-7 as described on the "Hawaii DOE Wellness Chart: Nutrition Guidelines (NG)". The BOE Policy 103-7 states that "no food and beverage [be] sold (outside of the school meals program) except for plain water".

"The Hawaii DOE Wellness Chart: Nutrition Guidelines (NG)" states that if the school is participating in USDA's afterschool snack program, the end of the school day is 30 minutes after snacks are served. This information is incorrect. The USDA defines the school day as the hours between midnight to 30 minutes after the end of the school day.

**Ewa Elementary:**  
School does not have a Local Wellness Policy on site.

**Keonepoko Elementary:**  
The school is making great strides towards promoting wellness within the school community and recently became a Blue Zones school. However, the current wellness guidelines that were provided do not meet USDA requirements. Per USDA regulations, the local wellness policy must establish leadership and permit participation by the general public and school community in the wellness policy process. The wellness policy, including any updates and progress towards meeting the goals of the policy, must be made available to the public.

**Pukalani Elementary:**  
The HI State DOE Wellness Guidelines that were provided is not the complete document: missing the second page. Be sure to include the second page, as it includes specific goals for physical activity/education, health education, and nutrition promotion (as required by the USDA).  
Great start! However, the documentation provided is not an actual policy and does not meet USDA wellness policy requirements in the following ways:

- Does not permit participation by the general public
- The wellness policy, including any updates to the policy, must be made available to the public. Posting the wellness policy committee's meeting minutes on the school's website would be acceptable.

**Kekaha Elementary:**  
Local Wellness Policy (LWP): school does not have a local wellness policy. DOE guidelines are not acceptable as they do not include a wellness committee team, dates of policy revision.

**Kaunakakai Elementary:**

- Reviewers asked school staff for the Local Wellness Policy (LWP) and follow up questions on 1/24 upon arrival. The team received a Wellness Policy manual the next day (1/25).
- Include the school's LWP (which should be based on DOE Wellness criteria), including who is on the Wellness Committee, with the Back to School package on the start of school, along with updates on the LWP in PTA newsletters. Additionally, post LWP information on School Website. Principal immediately placed Wellness information on the school website, i.e. corrected on site.





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##### Kohala Middle School:

'Health and Wellness Policy 103-1' link on Kohala Middle School's website contains direction stating that a Wellness Policy must be distributed, including directions about what should be included in the policy. This is NOT a wellness policy.

##### Kahaluu Elementary:

The school does not have a wellness policy.

##### Kauluwela Elementary:

School provided reviewers with an incomplete Local Wellness Policy. The LWP was missing the designation of its committee members but provided the names upon request. Additionally, school did not provide evidence of how the LWP was distributed. The school website contains a 'Health Policy' link, though the content was different from the LWP document that was provided to the reviewers.

##### Lanai High and Elementary:

Wellness Policy is not available on website at this time.

School does not have a Wellness Policy or a Wellness Committee as required by USDA regulations. Wellness Policy includes Specific School goals, Standards and polices, Wellness leadership at the school, Public Involvement, Triennial Assessments, and Documentation.

##### Keaukaha Elementary:

- Unable to locate Blue Zones Project information or the wellness policy on the school's website. The wellness policy, including any updates or progress made towards meeting goals of the policy, must be made available to the public.
- The wellness policy does not explicitly permit participation by the general public and school community. USDA guidelines for the Local Wellness Policy require that the school permit participation by the general public in the wellness policy process.
- The Local Wellness Policy shows that Keaukaha Elementary is part of the State-wide Farm to School Program. To HCNP's understanding, the school is no longer participating in the Farm to School Program.

##### Mililani High School:

- School did not have a Local Wellness Policy. Form provided during on-site review was a DOE Policy stating a wellness policy must be created.

##### Mililani Middle:

School does not have a Local Wellness Policy. Form that was provided to HCNP is a Wellness Guidelines 'checklist' that is intended to be used as a guidance for schools when creating their Policy. Policy must be made available to the public.

##### Kailua High School:

The school does not have a wellness policy. The school provided documentation of the most recent wellness fair in February which shows the school's efforts in promoting wellness.

##### Kalaniana'ole Elementary & Intermediate School:

- Policy does not have a designated committee, nor are households explicitly made aware of their ability to participate in policy revisions

##### Pahoa Elementary:

Good start! However, the wellness policy does not meet the USDA requirements:

- Does not permit participation by the general public
- Does not identify leadership



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- Does not mention how and how often the wellness policy will be assessed and how the assessment will be made available to the public

Waianae Intermediate:

The school does not have a wellness policy.

**Corrective Action:**

1. Review the USDA Local Wellness Policy requirements. The USDA requirements are available at: <https://www.fns.usda.gov/tn/wellness-policy>.

2. Ensure all schools are in compliance with the USDA Local Wellness Policy requirements. Submit the SFA's plan to complete this.

3. The Local Wellness Policy is an area that is reviewed by the SFA every year during the on-site review, under the general areas section of the SFA On-site Review Checklist MC-7 form. The SFA must review the school for compliance with the federal regulations. If there are any issues, the SFA must ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up onsite review to determine that the corrective action resolved the problems.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1110. Did on-site observation validate responses to Smart Snacks Questions #1100-1103 on the Off-Site Assessment Tool?

**Finding 9000: Smart Snacks**

• The Hawaii DOE Wellness Chart states, "If participating in USDA's afterschool snack program, end of school day is 30 minutes after snacks are served." This is incorrect. USDA SP 23-2014 (V. 3) Questions and Answers Related to the "Smart Snacks" Interim Final Rule states on page 14, Q&A #1 states, "How does this rule impact schools that also participate in the NSLP afterschool snack program or any part of the Child and Adult Care Food Program (CACFP)?"

The Smart Snacks standards are applicable during the school day, which is defined as the midnight before to 30 minutes after the end of the instructional day. If such programs are operated in the school during the school day, or if afterschool snacks or meals are provided within the 30 minute window after the end of the instructional day, any other food available for sale to students at that time must comply with the Smart Snacks requirements."

**Corrective Action:**

1. Revise the Hawaii DOE Wellness Chart to accurately reflect what is specified about the NSLP afterschool snack program as specified in the USDA guidance.

2. Submit the revised Hawaii DOE Wellness Chart.

3. Update the DOE website with the revised Hawaii DOE Wellness Chart. Provide the link to the revised Hawaii DOE Wellness Chart.

4. Provide communication from SFSB that demonstrates how all schools under the jurisdiction of the SFA were informed of the revisions.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



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

##### **Finding 9000: Professional Standards - Training Requirement Hours Not Met**

For Professional Standards training, SFSB made a change from the last Administrative Review. Previously, SFSB stored all professional standards hours in the SFSB office. SFSB now has each school track its own hours but SFSB did not monitor, track, or provide the training hours from all of the schools. SFSB only provided training information for the staff at SFSB. Per Albert Scales via email on 11/27/18, "...beginning in February 2019 there will be annual training for all staff. Also, SFSB is procuring software to help with the training and documentation of staff training."

SFSB provided a "Professional Standards Requirement Training Log" for SY 2017-2018 to show the number of training hours completed by each SFSB staff member, in addition to providing training certificates for each event. After reviewing this log, it has been determined that the following staff members did not complete the necessary hours of training required by USDA Professional Standards guidelines:

- Pang, Catherine: completed 4.5 hours of training (managers are required to complete 10 hours of training annually)
- Matsumoto, Micah: completed 1.5 hours of training (managers are required to complete 10 hours of training annually)
- Yamamura, Sandra: completed 4.75 hours of training (all other full time staff are required to complete 6 hours of training annually)
- Yoshioka, Miho: completed 4.75 hours of training (all other full time staff are required to complete 6 hours of training annually)

##### **Corrective Action:**

1. SFSB must maintain a master list of all school nutrition program employees and keep the master list current. SFSB must monitor annual training hours for all school nutrition program employees at the SFA level and at the school level and ensure all employees meet the annual training hours requirement. SFSB must clearly document all required information and keep it consolidated in one place. USDA has a Training Tracker Tool which is a resource to assist SFAs track and record the annual training hours completed by each school nutrition program employee (<https://pstrainingtracker.fns.usda.gov/>). HCNP also has a Training Tracker Tool available on HCNP's website (<https://hcnp.hawaii.gov/wp-content/uploads/2021/05/HCNP-Training-Tracker-Tool-Indiv-Rev-5.14.21.xlsx>) that is available for SFAs to use. In addition to tracking training hours, all training documentation must be readily available upon request by the State Agency.
2. Create a standard operating procedure (SOP) detailing how SFSB will ensure all school nutrition program employees at the SFA level and at the school level have met the required professional standards hours training requirement annually. Include in the procedures how the SFA will have all required information readily available for review upon request by the State Agency.
3. Submit the SOP.
4. Train all appropriate staff on the SOP.
5. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

#### 1216. Validate OFS #1206 - Did School Nutrition personnel meet annual training requirements?



### Program Year 2019

#### Finding 9000: Professional Standards (School Level)

The following issues with Professional Standards were found at the schools selected for review:

##### Washington Middle:

Three staff members have yet to meet their annual training hours. Brenda Tome and Donna Okada must complete 1.25 more hours of training before the end of the school year. Cheryl Chock must complete 2 more hours of training before the end of the school year. Part-time staff must complete a minimum of 4 hours of training annually.

##### Chiefess Kamakaha Middle:

Meal Clerks Brandi, April, Elisa, Lichelle, and Verlyn each need 1 more hour of training to meet annual training requirements for part-time food service employees (4 hours total needed). HCNP recommends they receive the additional training hour on a relevant topic, such as meal counting.

##### Aliamanu Elementary:

- The SFSS Staff training log indicates that the Dept of Health Food Handler's Training was held on 3/8/18, which was in SY 17-18. The SFSB supervisor explained that this was a mis-type.
- Not all school nutrition staff met the required annual training hours. The following staff must complete required training hours before the end of the school year:
  - Trisha-Ann Patterson (need 4 hours)
  - Natalie Cortez (need 4 hours)
  - Noriko Sogawa (need 4 hours)
  - Carol Mann Molay (need 4 hours)
  - Patrick Kim (need 6 hours)

##### Ewa Elementary:

- Food Service employees have not met annual training requirements for SY 18-19. Allen Narcisco, Erlene Hutchinson, and Tammy Tong have each completed 3 hours; Amy Kapihe has completed 5 hours; and Janice Olita does not have any documented training hours.
- Training logs for the cashiers were not available on the day of review. Staff stated that this documentation is on file and will provide it promptly.
- Per USDA regulations, staff that work 20 hours or more in the food service program must receive 6 hours of annual training, while those working less than 20 hours must complete 4 hours annually.

##### Keonepoko Elementary:

Unable to determine if all staff met required training hours for the current school year due to incomplete and/or unclear documentation due to the following: dates were missing or incorrectly written; number of hours credited were unclear and/or did not match the times listed on the sign-in sheet; staff were listed on the training log but did not have backup documentation to support the training; staff names and signatures were on training sign-in sheets but not credited on the training log. TA was provided to the manager on the necessary corrections.

##### Pukalani Elementary:

- All staff involved in the meals program must meet the minimum required training hours and be trained annually in Civil Rights. Additional training topics should include OVS and meal counting practices. Retain all training documentation, including sign-in sheets, agendas and training materials.
- Log each training sign-in sheet on only one line of the training tracker spreadsheet. Do not list each topic separately on a different line. This simplifies the spreadsheet and makes it easier to read. Note: the sign-in sheet for 8/6/18 shows that the training was 2.5 hours long, however on the training tracker spreadsheet only 2 hours was credited to each employee.



#### Program Year 2019

##### Hana High & Elementary:

Food service staff did not meet annual training requirements. Manager Sean Roback, Cook Muriel Yamashita, and Baker Sherwood Oliveira each have 2 hours and 40 minutes of annual training in SY 18-19. Sean Roback will need 7 hours and 20 minutes of additional training. Muriel Yamashita and Sherwood Oliveira will each need 3 hours and 20 minutes. There is no record of any training for the Meal Counting Clerk – Jonelle Pi'imauna-Beck – she requires 4 hours of training. Training for the meal counting clerk should include Civil Rights, meal counting procedures and OVS.

##### Kaunakakai Elementary:

- For cashiers (located at POS during meal service) Elsa, Ilana, Brittany, and Rory: only Elsa has documentation of any training completed (13.75 hrs total). All staff that work in any part of the food service operation must have annual training – for part-time staff (less than 20 hrs per week), the requirement is 4 hours; for full-time staff (more than 20 hrs per week), the requirement is 6 hours. Civil Rights must be included in this annual training for all staff. Ilana, Brittany, Rory will each need at least 4 hours of annual training (including Civil Rights).
- Additional training for manager regarding both forecasting and meal pattern is recommended – during observed lunch service on 1/24, serving line ran out of apples and staff needed to cut apples during service, slowing the line. During kitchen observation/meal prep on the morning of 1/25, reviewers noted that the vegetable component (per Production Records) was not met. Prior to service, kitchen manager corrected the issue by increasing serving size of greens.

##### Kahaluu Elementary:

- All school nutrition program staff have not yet met the required annual training hours for SY 18-19, including the meal clerk.

##### Lanai High and Elementary:

- Gordon has completed 8.5 hours of the 10 hours of required training in SY 18-19.
- Cashiers do not have any documentation of training.

##### Keaukaha Elementary:

- Training documentation was not provided for the meal clerks (Britney and Mona). Staff who work less than 20 hours a week need to have at least 4 hours of annual training.

##### Mililani Middle:

- Per conversation with the kitchen manager, four substitute kitchen staff are currently not required to undergo NSLP training on an annual basis and thus do not have proof of training documentation. Per USDA regulations, part-time staff (<20 hours/week) are required to obtain a minimum of 4 hours annually, while full-time staff must obtain 6 hours; the kitchen manager must receive 10 hours annually.
- Manager must determine what the weekly average number of hours each of the substitute employees have worked to determine if they must obtain full (6 hours) or part-time (4 hours) training. Additionally, all cashiers/meal clerks must be trained (Civil Rights and preferably OVS) on an annual basis.
- Per training logs, full-time staff have received approximately 2.5 hours of training for SY 18-19; there was no training documentation for the kitchen manager, substitute staff, or cashiers/meal clerks.

##### Kailua High School:

- Irwin and Lisa each had 5 hours of training (need one more hour of training by the end of the school year).
- Jerimae has not had any training (need six hours of training by the end of the school year).
- The ten staff who do meal counting have not had any training (need four hours of training by the end of the school year).
- Remember to maintain training documentation (date of training, length of training, agenda, sign-in sheets).



### Program Year 2019

Kalanianaʻole Elementary & Intermediate School:

- Derek Bentosino (cook) and Heidi Kawelu (driver) each need 5 more training hours to meet annual requirement of 6 hours. Ariel Tomono (baker) needs 1 additional hour.

Pahoa Elementary:

- There was no training documentation for the Meal Counter Kyle Domingo – he will need to receive 4 hours of training by the end of the school year. Training topics must include Civil Rights, and should include Offer-Versus-Serve and meal counting practices. All other employees meet professional standards.
- Reminder: training activities require a minimum of 15 minutes of instruction to be counted toward professional standards. Training logs provided contained several trainings that were 10 minutes in length and therefore should not count towards meeting requirements.

Waiānae Intermediate:

Not all school nutrition staff met the annual training hours requirement. The following staff need to be trained before the end of the school year:

- Natalie Dacquel (need 6 hours)
- Flame Kila (need 1 hour)
- Angela Baker (need 2 hours)
- Teresa Sarno (need 4 hours)
- Adric Mahealani (need 4 hours)
- Valerie Verano (need 4 hours)
- Tanya Evangelista (need 4 hours)
- Charlene Penitani (need 4 hours)

### Corrective Action:

1. Create a standard operating procedure (SOP) detailing all actions staff at the SFA level and at the school level will take to ensure all school nutrition program personnel meet the USDA Professional Standards training requirements every year. Include in the SOP clear instructions on how to document completed trainings accurately, how to maintain documentation that training was completed by staff, and how to have training documentation such as training log, certificates, sign-in sheets, agenda, etc. readily available upon request.
2. Submit the SOP.
3. Train all appropriate staff on the SOP.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1216. Validate OFS #1206 - Did School Nutrition personnel meet annual training requirements?



Program Year 2019

**Finding 9000: Professional Standards - Inaccurate and Inadequate Training Documentation**

Professional Standards training documentation is inaccurate. The following issues were found:

- 6/29/18 NSLP Training “Back to Basics”: a training certificate was provided for Dexter Kishida, he is not credited with hours for this training session on the Professional Standards Requirement Training Log.
- Harold Ferwerda is not included on the Professional Standards Requirement Training Log. TA supervisors must also meet professional standards requirements and be recorded in training documentation.
- The sign-in sheet for the NSLP Training “Admin Review Preparation” on 9/26/17 was reviewed and compared to the Professional Standards Requirement Training Log. Some staff members only signed in under the PM signature section but not the AM signature section. This suggests that they were only present for half a day (4 hours) of training. However, on the Professional Standards Requirement Training Log, these staff members were credited with completing 7 hours of training.

The staff members are:

- o Ivan Chee
- o Alcian Clegg
- o Elsa Ebisuya
- o Miho Yoshioka

Only count the number of hours that the staff attended the training toward their required training hours.

Professional Standards training hours are not adequately documented. On the sign-in sheets for the SFSB SY 18-19 Beginning of the Year (BOY) training, the following issues were found:

- The number of hours counted towards professional standards training requirements are not documented. Some sign-in sheets indicate the start and end times for the training; however, the number of hours being credited should be indicated because time spent for breaks and lunch break must be excluded from the number of training hours being credited.
- Two sign-in sheets (Kauai District Meeting and King Intermediate/District Office) listed the meeting time as 8:00am-2:20pm and length of training was listed as 8 hours. The number of hours was not calculated correctly - 8:00am - 2:20pm is less than 8 hours and, as noted above, any breaks need to be deducted from the length of the training.
- Not all staff members attended the BOY training. SFSB stated that staff members who were unable to attend the BOY training were trained on another date by the SFSB Supervisor, however there is no documentation (sign-in sheet, agenda) to demonstrate staff completed the training.

**Corrective Action:**

1. Create a standard operating procedure (SOP) on how all training documentation (training log, certificates, sign-in sheets, agenda, etc.) will be maintained properly to contain all information as required by USDA to demonstrate that staff completed the trainings and that training records are accurate. All training documentation must be readily available upon request to demonstrate your SFA is in compliance with USDA Professional Standards regulations.
2. Submit the SOP.
3. Train all appropriate staff on the SOP.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1501. Records retained for 3 years?



Program Year 2019

**Finding 9000: Recordkeeping - Not retaining records**

SFSB is not retaining program records for at least 6 years plus the current year after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. SFSB was unable to provide documentation for the CEP ISP data for the base years, Professional Standards training documentation, and the SFA On-site Review form (MC-7) for Kohala Middle for SY 17-18. Albert Scales stated the MC-7 form is missing. It was completed by the Supervisor that retired in 2017.

**Corrective Action:**

1. Create a standard operating procedure (SOP) for retaining all program records for at least the minimum required number of years or until the resolution of any audits. SFSB staff must be able to readily retrieve any and all program records even after staff are no longer employed at SFSB and at the school level.
2. Submit the SOP.
3. Train all appropriate staff on the SOP.
4. Submit the SOP and training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1501. Records retained for 3 years?

**Finding 9000: Recordkeeping - White out**

White out was found on an application with no notation. SFSB staff stated that the schools were trained at the beginning of the school year that they need to note if an application was received with white out.

Whiteout was used on the SFA's On-site Monitoring Review Form for Mililani Middle School. Do not use whiteout when making corrections – draw a line through the error.

**Corrective Action:**

1. Train all SFA-level staff and school-level staff on the use of white out on documentation annually. When documentation such as a meal application is received from the household with white out on it, the school staff must make a note on the application that the application was received with white out so it is clear that the school did not alter any information on the meal application.

SFA-level and school-level staff are not to use white out when an error is made on official documents such as meal applications, meal counting records, production records, and edit checks. Instead, put a line through the error, add the change, include an explanation if necessary, and initial and date the change.

2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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





### Program Year 2019

#### **Finding 9000: School Breakfast Program (SBP) Outreach**

The SFA did not do outreach for the School Breakfast Program for SY 18-19 as required per SP 40-2011. The SFA must inform eligible families of the availability of reimbursable breakfasts served under the SBP. Schools participating in the SBP must inform families of the availability of breakfasts. A notification of the availability of breakfast must be relayed just prior to or at the beginning of the school year in the informational packets that are sent to each household with free and reduced price meal applications for the new school year. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year. Schools can provide reminders to children through their public address systems in schools or through means normally used to communicate with the households of enrolled children. Other acceptable outreach activities may include developing or disseminating printed or electronic material to families and school children. For example, information about the SBP should be posted on the school's website.

The following issues with SBP outreach were found at the schools selected for review:

#### **Aliamanu Elementary:**

The school did not provide evidence of completing breakfast outreach. The breakfast promotion documentation that was provided promotes food and fitness for a healthy child, but it does not inform households that breakfast is available in the school. School breakfast outreach must be completed at the beginning of the school year and multiple times throughout the school year.

#### **Ewa Elementary:**

The School Breakfast Program is mentioned in the Start of Year Parent Bulletin, however documentation to show that breakfast outreach was done multiple times throughout the year was not provided.

#### **Pukalani Elementary:**

School breakfast outreach was sent to households on 8/7/18 and 9/6/18. This is a good start. As a reminder, school breakfast outreach must be done at the beginning of the school year, and multiple times throughout the school year.

#### **Hana High & Elementary:**

The school has not done breakfast outreach. SBP outreach must be done prior to or at the beginning of the school year and multiple times during the school year.

#### **Kekaha Elementary:**

Handbook includes both CEP and breakfast outreach. However, breakfast outreach is required to be done once at the beginning of the school year and multiple times throughout the year.

#### **Kaunakakai Elementary:**

School has flyer posted in cafeteria explaining availability of free breakfast for all students; however, no evidence was provided to reviewers that households were sufficiently made aware of breakfast availability. Per USDA regulations, breakfast outreach must occur once at the beginning of the school year and multiple times throughout the year (e.g. beginning of each quarter).

#### **Lanai High and Elementary:**

Breakfast Outreach not available on website but was provided in Back to School Handouts.

#### **Mililani High School:**

No evidence that breakfast outreach was conducted as required: at the beginning of the school year and multiple times during the school year.



### *Program Year 2019*

#### Kalaniana'ole Elementary & Intermediate School:

School uses a Parent Handbook at the beginning of the year to inform parents about school meal program, including breakfast and CEP information. Monthly menus are also posted on the school's website. However, USDA requires breakfast outreach be done once at the beginning of the year and multiple times during the year. School should conduct at least one additional breakfast outreach effort during the school year, for example via newsletter.

#### Waianae Intermediate:

The school could not provide evidence of conducting School Breakfast Program (SBP) outreach. SBP outreach must be provided to households at the beginning of the year and multiple times throughout the school year.

#### **Corrective Action:**

1. Explain in detail how the SFA will meet the SBP outreach requirement to inform families of the availability of breakfasts annually.
2. Explain in detail how the SFA will ensure all schools throughout the SFA that operate the SBP meet the SBP outreach requirement annually.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### **Other Federal Programs - DOE School Food Services Branch (1434-6)**

*1802. Changes in dates of operation from approved dates?*



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### **Finding 9000: SFA has sites that are not operating SSO as stated on their approved application and as advertised on press release.**

SFA has sites that are not operating the Seamless Summer Option (SSO) as stated on their approved site applications. Also, discrepancies were found with the start and end dates of SSO operation between the revised press release and the approved site applications.

- Kahuku Elementary was approved to operate SSO, but students walk to the high school for meals.

- Kahaluu Elementary: ended SSO early. The site was approved to operate SSO until 7/13/18. The SFSB Supervisor tried to do the SSO review on 7/3/18 but there was no SSO on that day. SFSB informed the school to continue SSO. SSO was resumed on 7/5/18.

- Hilo Intermediate: school canceled one of the SSO programs without notifying SFSB. Therefore, the press release did not match the date on the application. (revised press release listed start date was 7/2/18; site application approved to start on 7/16/18)

- Waimea Elementary: school had a second program that operated until 7/20/18. The press release did not match the end date on the application. (revised press release listed the end date was 7/3/18; site application approved to end on 7/20/18).

- Farrington High: last day of SSO was on 7/19/18. The press release did not match the end date on the application (revised press release listed the end date was 7/20/18; site application approved to end on 7/19/18). Also, the school's site application stated it was operating Monday-Friday but the site is operating any four days during the week. The SFA did not inform HCNP of this during the SSO application process.

#### **Corrective Action:**

For Kahuku Elementary, the SFA corrected the site application (selected "Not Participating" for SSO) for June 2018 on 7/16/18 and for July 2018 on 9/21/18.

To address all of the other discrepancies, SFSB must do the following:

1. Develop a standard operating procedure (SOP) that will be followed by the schools and SFSB staff to ensure the public is informed of the correct and most current information of the availability of free summer meals. Include in the SOP steps that will be taken to ensure HCNP is informed of the correct information, including revising the site applications when the schools make any changes to the SSO operation, and informing HCNP of operation details that cannot be explained on the site application (such as the site is operating any four days per week so SFSB selected the site is operating Monday-Friday on the site application).

2. Train all applicable school staff and SFSB staff who will be responsible for following and ensuring the SOP is followed. Maintain all training documentation (sign-in sheet, date of training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

1802. Changes in dates of operation from approved dates?



**Program Year 2019**

**Finding 9000: SFA Operations - Dates of Operation, Press Release \*Repeat Finding**

On 6/7/18, SFSB's School Food Program Administrator was informed by HCNP that the SSO Press Release needed to be revised to reflect the correct site information (dates of operation and meal service times) and add the additional site that was approved to operate SSO. Also, the nondiscrimination statement needed to be added to the "2018 Seamless Summer Option (SSO) Program" document that was posted and the correct long version of the nondiscrimination statement needed to be on the SSO Press Release. These issues are repeat findings from the SY 15-16 Administrative Review.

On 6/29/18, SFSB responded that everything was corrected. The nondiscrimination statement in both places was corrected. However, there were still issues with dates of operation with several sites.

The following sites did not operate according to the dates of operation that were approved.

**Farrington High:**

Revised Press Release: End date 7/20/18  
Site Application: End date 7/19/18

**Hilo Intermediate:**

Revised Press Release: Start date 7/2/18  
Site Application: Start date 7/16/18

Per SFSB, the school canceled one of the SSO programs without notifying SFSB. Therefore, the press release did not match the site data on the application.

**Kahuku Elementary:**

The school was approved to operate SSO in June. The SFA informed HCNP that the students walk to the high school for meals. The application was recently revised to "Not Participating" in mid-July.

**Kahaluu Elementary:**

Site Application: End date 7/13/18  
Per SFSB, the school ended SSO early. The SFSB Supervisor tried to complete the SSO review on 7/3/18 but the school did not have SSO that day. The school was informed by SFSB to continue SSO. The school resumed SSO on 7/5/18.

**Waimea Elementary:**

Revised Press Release: End date 7/3/18  
Site Application: End date 7/20/18  
Per SFSB, there was a second program that ran until 7/20.

**Corrective Action:**

1. Describe what will be done next school year to post accurate public notifications so the public knows which schools are participating in SSO and the dates of operation.
2. Describe to HCNP SFSB's plan to eliminate inconsistencies between the SFA level information and what is occurring at the school level.
3. Describe what action will be taken to ensure schools will not deviate from the publicized dates of operation.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



Program Year 2019

1805. SFA reviewed all SSO sites at least once?

**Finding 9239: SFA has not conducted a review of each of its Seamless Summer Options sites at least once during the site’s operation. \*Repeat Finding**

There were 69 SSO sites that were approved to operate SSO in the summer of 2018, but 68 sites were in operation (Kahuku Elementary’s application was revised to not participating in mid-July). HCNP received a total of 65 SSO on-site review forms on July 19, 2018.

The following on-site reviews were not submitted:

- Hilo Intermediate
- Waiakea Intermediate
- Kalihi Waena

SFSB stated that it was waiting on two review forms from the Hawaii district (Hilo Intermediate, Waiakea Intermediate). A review was not completed for Kalihi Waena Elementary. Not completing a review for each site is a repeat finding from the SY 15-16 Administrative Review.

Out of the 65 SSO reviews submitted, 38 had incorrect or incomplete forms due to the following:

- the general information section (top third of the first page) review questions were not answered correctly or not answered (Type of SSO Site, Dates of Operation – dates did not match the those listed on the Press Release, whether the site is considered “area eligible”)
- questions were not answered (#1, 2, 4, 5, 9, 10)
- question #8 (outreach materials) was answered incorrectly due to both ‘yes’ and ‘no’ boxes being checked
- number of children in attendance was not provided
- there were discrepancies between the reviewer’s count and the number submitted in the claim (differences in counts ranged from 1-19) with no explanation
- question whether a follow-up review was required was not answered

Not completing the SSO review forms correctly is a repeat finding from the SY 15-16 Administrative Review.

Kekaha Elementary’s on-site review form indicated that a follow-up review was required. The follow-up review was not submitted on July 19, 2018.

**Corrective Action:**

1. Submit the SSO review forms for Hilo Intermediate and Waiakea Intermediate.
2. Submit the follow-up review for Kekaha Elementary.
3. Describe how SFSB will ensure all SSO reviews will be completed for each site every summer.
4. Describe how SFSB will ensure all SSO reviews will be completed correctly every summer. Include retraining SFSB District Supervisors as part of SFSB’s plan. Train all SFSB Supervisors. Submit the training documentation (sign-in sheet, date of training, agenda).

**IX Special Provision Options - DOE School Food Services Branch (1434-6)**

2115. CEP most recent approval – documentation support ISP and claiming percentages?



Program Year 2019

**Finding 9000: Community Eligibility Provision (CEP)**

Based on a review of the documentation that was provided by SFSB for the SY 2018-2019 Administrative Review (AR), HCNP was not able to validate SFSB's CEP base year identified student percentages (ISPs) that were effective during SY 2018-2019 due to insufficient documentation. During the SY 18-19 AR, your SFA stated that it did not retain documentation of student names used to qualify schools for CEP, and that direct certification (DC) information was gathered from your SFA's former POS system, which it no longer had access to at the time of the SY 18-19 AR.

Missing documentation and the inability to validate a CEP ISP is a serious concern that impacts the integrity of claims for reimbursement. Ordinarily, in a situation in which the ISP cannot be validated, an ISP would have to be recalculated and fiscal action would be applied to the difference between the newly calculated ISP and whatever ISP was in place. However, given that ISPs that were being used in SY 18-19 are very old and no longer in use, the USDA Food and Nutrition Service is providing HCNP with the flexibility to require SFSB to establish new ISPs for SY 2024-2025 (in other words, SY 24-25 will be SFSB's new CEP base year). HCNP must validate the ISPs for SY 24-25 at the time of application. There will be no further action on validating the ISPs or applying fiscal action for invalidated and recalculated ISPs for SFSB's SY 18-19 AR.

SFAs are responsible for maintaining all documentation that supports the ISPs and CEP claiming percentages. Program records must be maintained for a minimum of six years plus the current year per DOE requirements. If audit findings have not been resolved, these records must be retained beyond the six-year period as long as required for the resolution of issues raised by the audit.

**Corrective Action:**

1. Create a standard operating procedure (SOP) explaining in detail how the SFA will maintain all documentation supporting the ISP numbers for the CEP base years for the required minimum number of years. The supporting documentation must be readily available upon request by the State Agency.
2. Submit the SOP that is implemented by the SFA.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*2115. CEP most recent approval – documentation support ISP and claiming percentages?*

**Finding 9000: Community Eligibility Provision (CEP) Outreach**

The following schools selected for review did not inform families at the beginning of the school year that the school is implementing CEP.

**Hana High & Elementary:**

The school has not done CEP outreach. CEP outreach must be done every year at the beginning of the year to inform families that the school is implementing CEP.

**Waianae Intermediate:**

CEP outreach is posted on the school's website and social media outlets on 3/14/19, however CEP outreach should be provided to households at the beginning of the school year.



### *Program Year 2019*

#### **Corrective Action:**

1. Explain SFSB's process for instructing CEP schools to communicate to families at the beginning of the school year that the school is implementing CEP. Include in the process how SFSB will ensure all CEP schools send communication to the families at the beginning of each school year when CEP is implemented.
2. Submit the notification templates that SFSB distributes to CEP schools to inform families of the school's participation in CEP.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Aliamanu Elementary (203)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: April 3, 2019

#### Commendations

\* Aliamanu Elementary

Documentation was organized.  
Manager has a binder of labels that were neatly organized.  
Creole macaroni was tasty.

\* Fiscal

- Thank you for having all requested documents ready and well organized
- Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)
- Deposit slips matched Summary Reports

#### Technical Assistance

\* Signage

Current signage used for breakfast and lunch is OVS signage. The school does not implement OVS. The school can post their monthly menu as signage. The signage must be posted at or near the beginning of the serving line. The OVS signage was corrected during the onsite review – the OVS part was blacked out.

\* Smart Snacks Standards

Smart Snacks Standards – the school day is defined as midnight before school starts and 30 minutes after the end of the school day. All food and beverages sold outside of the school lunch and school breakfast program must meet the USDA Smart Snacks Standards. Information on the Smart Snacks Standards are available at: <https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks>. This website also has a link to the Smart Snacks Product Calculator. This is a useful tool to help determine if a product meets the Smart Snacks Standards. Maintain this documentation to show that the product meet the Smart Snacks Standards.

\* Fiscal

- Reviewers noticed an invoice dated 10/11/18 that was processed on 11/15/18. Just a reminder it is important to pay all invoices promptly, as delayed payments could lead to delinquent fees/late charges. These late charges cannot be paid from the nonprofit school food service account. Instead it must be paid with the school's general funds.

#### Suggestions

\* POS Computer

Suggest putting a screen protector on POS laptops. One POS monitor is facing the wall, but the other POS has a monitor students can view.





### Program Year 2019

#### \* Share Table

- Implement a share table where students may place milk that they don't intend to drink to prevent having to throw away unopened milk.

#### \* Serving Line

- Have an adult help with serving the white milk to the preschool students to prevent students from taking chocolate milk or move the crate of chocolate milk to the back of the milk cooler so it is harder to access.

#### \* Fiscal

Suggestion: it would be best that the two daily eTritition Reports are signed by the School Food Service Manager:

- o eTritition RPT401 Bank Deposit Report (that the Bank of Hawaii Deposit Ticket is attached to)
- o eTritition RPT415 Manager's Summary Report (page 3)

### Meal Components & Quantities - Aliamanu Elementary (203)

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

#### **Finding 9000: Meal Components and Quantities - Ran out of food during service**

Food is transported to Aliamanu Elementary School from Aliamanu Middle School. During the observation of lunch on April 3, 2019 one of the serving lines ran out of fruit (fruit slushy). While a staff member went to the kitchen to get more fruit slushies, the meal counter continued to scan students into the POS system. Four students were scanned into the POS system as having a reimbursable meal even though they did not have the required fruit component on their plate. A reviewer informed the meal counter that the student must have a complete reimbursable meal before leaving the point of service if they are being counted as having a reimbursable meal. The line was held up until the fruit component was replenished. The four students who were scanned earlier were eventually provided with their fruit component. This is not an acceptable practice for meal counting.

Also, while reviewers were onsite on April 4, 2019, the school was short on chicken tenders.

Not transporting enough food from the middle school to the elementary school may result in non-reimbursable meals if the food items are not replenished. All meals claimed for reimbursement must contain all required meal components.

#### **Corrective Action:**

1. Provide meal pattern training to all food service staff and meal counting staff so staff understand what makes up a reimbursable meal and why all food items must be available to all students on the meal service line.
2. Provide training to all food service staff on how to complete the production records, which includes forecasting correctly and ensuring enough food is packed and transported to Aliamanu Elementary to prevent any food shortages.
3. Provide meal counting training to all meal counting staff so staff understand what point of service means and that meals must be counted at the point of service.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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



Program Year 2019

**Finding 9000: Meal Components and Quantities - Day of Review (Incorrect Serving Utensil)**

During lunch service, the incorrect spoodle was used to serve salad to the Pre-K students. A 8 oz spoodle (1 cup) was used to serve ½ cup of salad. Although the student server did not fill the 8 oz spoodle completely, the correct serving utensil should have been used to ensure the correct serving size is served to the students to meet the meal pattern requirements.

**Corrective Action:**

1. Provide training to food service staff on how to determine the correct serving utensil to use based on the serving size listed on the production record. Highly recommend using the Institute of Child Nutrition's Basics at a Glance Poster when training staff on the different serving utensils. This poster should also be posted in the kitchen so they can easily refer to it when needed.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Components and Quantities - Day of Review (Production Records)**

The following issues were found with the Day of Review menu documentation:

Breakfast (4/3/19)

- Chicken patty: the serving size and contribution that is listed on the production record is incorrect. Per CN label information: 1 patty weighs 1.5 oz (not 1.63 oz) and provides 0.25 oz eq grain (not ½ grain).

Breakfast (4/4/19)

- Portuguese sausage: the serving size that is listed on the production record is incorrect. The manager confirmed that Pre-K is served 2 pieces, and K-AD is served 3 pieces. Per CN label information, 2 pieces of sausage is 1 oz (not ½ oz) for Pre-K, and 3 pieces is 1.5 oz (not 1 oz) for K-AD.

Lunch (4/3/19)

-Creole Macaroni: the "Plan For" numbers printed on the production record appear to be mistyped. The SFSM and SFSB Supervisor confirmed that this was an error. The "Amt Needed" that was calculated for the tomato paste and the crushed tomatoes is incorrect. The SFSM and SFSB Supervisor confirmed that the error was due to the incorrect unit of measure being used on the production record. The correct unit of measure is cans, but pounds was being used.

- Creole Macaroni: the meal contributions provided by recipe are not consistent with the amounts listed on the production record. Based on analysis using the USDA Recipe Analysis Workbook (RAW), the recipe for Pre-K provides 1/8 cup red/orange vegetable (not ¼ cup), 1.5 oz meat/meat alternate, and 1.25 oz grain (not 0.5 oz). The recipe for K-AD provides ¼ cup red/orange vegetable, 2.5 oz meat/meat alternate (not 2 oz) and 2.0 oz grain (not 1 oz).

Lunch (4/4/19)

-Oranges is listed at the top portion of the production record, but pineapple is listed in the body of the production record. The SFSM confirmed that oranges will be served. This was corrected onsite.



Program Year 2019

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Components and Quantities - Recipes**

Recipes are not standardized. Recipes are missing yield, amounts for ingredients, clear instructions on what to do, and portioning information. Examples of recipes that are not standardized: beef stew (without ulu), shortbread cookies, grandma's cookies, and peach muffin.

Standardized recipes are a documentation source for the Administrative Review (AR). A review cannot be completed if the recipes are missing information or provide inaccurate information on ingredients, yield, or serving size.

**Corrective Action:**

1. Standardize all recipes used for the school meal programs. Ensure each recipe includes the yield, amounts for each ingredient, clear instructions on what to do, and information on how to portion the item. Information on standardizing recipes is available at: <https://theicn.org/cicn/usda-recipe-standardization-guide-for-school-nutrition-programs/>

2. Submit the standardized recipes for the beef stew (without ulu), shortbread cookies, grandma's cookies, and peach muffin.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Components and Quantities - Review Period**

The meal pattern requirements were not met for the week of October 1-5, 2018. Also, numerous issues were found with the production records.

Monday, October 1, 2018 Lunch

- Cheesy fish burger: cheese was not listed on the production record.

- Tomato chunks: the staff explained that whole tomatoes are cut into wedges and then cut in half. The factor listed is for cherry tomatoes. Correct the factor.

Tuesday, October 2, 2018 Lunch

- Ground beef: Per 100 Factor is incorrect for 80/20 ground beef. Should be 12.7, not 12.6. Since the amount needed was not enough, the ground beef was credited as 1.25 oz eq instead of 1.5 oz eq. This means that the minimum daily meat/meat alternate requirement was not met for Pre-K (short 0.25 oz eq).

- The recipe for the chili used lists 85/15 ground beef. Since 80/20 ground beef was used, the recipe provides 1.25 oz eq meat/meat alternate per serving for PreK-8, not 1.5 oz eq.

- Nacho chips: 6 chips = 0.5 oz eq grain, not 1 grain.

- Tomato chunks – the staff explained that whole tomatoes are cut into wedges and then cut in half. The factor listed is for



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

cherry tomatoes. Correct the factor.

Wednesday, October 3, 2018 Lunch

- Daily vegetable requirement was not met (short 1/8 cup).
- Chicken Tenders: 3 pieces = 1 oz eq grain, not 0.75 grain. Also, 3 pieces weigh 4.5 oz, not 3.3. oz.
- Rice was listed on the top in the menu section but was not listed on the bottom of the production record.

Thursday, October 4, 2018 Lunch

- Romaine lettuce: production record lists 1/8 cup as the Size of Serving and the Contribution for Pre-K and K-6. This is not correct. Raw leafy greens credit at half the volume served.
- Production record does not match the Serving Site Daily Record.
  - o The production record lists 1/8 cup baby carrots, 1/8 cup celery sticks, and 1/8 cup serving of romaine lettuce for Pre-K and K-6.
  - o The Serving Site Daily Record lists a 1/2 cup serving of House Salad for Pre-K and 1 cup for K-6. The Serving Site Daily Record also lists Tomato Chunks for K-6, but Tomato Chunks are not on the production record. Explain what was served to each grade group.

Friday, October 5, 2018 Lunch

- Daily vegetable requirement was not met (short 1/8 cup).
- Pizza: 1 slice provides 2 oz eq meat/meat alternate and 1/8 cup red/orange vegetable. These were not listed on the production record. Note: meal is still short 1/8 cup vegetable (1/8 cup from the pizza was included in the total vegetables served for the meal).
- Production record does not match the Serving Site Daily Record.
  - o The production record lists 1/4 cup makina cabbage, 1/4 cup serving for romaine lettuce for Pre-K and K-6.
  - o The Serving Site Daily Record lists 1/4 cup Rainbow salad for Pre-K and K-6.

Monday, October 1, 2018 Breakfast

- The production record for the alternate breakfast (cereal and toast) incorrectly lists the serving size as 4 oz for cereal and 4 oz for toast.
- Serving Portion column was not completed correctly. "1@" is listed for every line item.

Tuesday, October 2, 2018 Breakfast

- Breakfast sliders for grades 7-12: the contribution and size of serving columns on the production record both listed 1/2 cup. This is incorrect.

Wednesday, October 3, 2018 Breakfast

- The production record for the alternate breakfast (cereal and toast) incorrectly lists the serving size as 4 oz for cereal and 4 oz for toast.

Thursday, October 4, 2018 Breakfast

- Pork links: the serving size is two links. Two links weigh 1.36 oz, not 1 oz that is listed under the serving size.

Friday, October 5, 2018 Breakfast

- Serving Site Daily Record lists 2.5 oz for Pre-K and 3.5 oz for K-A for the pork patty and cheese on WG bun. Please clarify what these numbers mean.

Since the week of October 1-5, 2018 did not meet the lunch meal pattern requirements, the rest of October was reviewed for



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

lunch.

Monday, October 15, 2018 Lunch

- Beef Stew with Ulu: the recipe does not specify what to serve Pre-K. According to the production record, Pre-K would have received a smaller portion based on the smaller amount of meat and ulu that is listed. The recipe is not crediting the M/MA and the other vegetables correctly for K-8. The recipe provides 2 oz eq M/MA, not 1.5 oz. The recipe provides  $\frac{1}{4}$  cup of other vegetables, not  $\frac{3}{8}$  cup.
- Crushed tomato is listed as 4 cans but it should be 4.29 cans.
- For grades 7-8, romaine lettuce crediting is not half of the amount served. Serving is  $\frac{1}{2}$  cup but the crediting is  $\frac{3}{8}$  cup.
- Chicken Tenders: the amount of grain listed on the production record is incorrect. 3 pieces provides 1 oz eq grain, not 0.75.

Tuesday, October 16, 2018 Lunch

- Ground Beef, 80/20: the Per 100 Factor is incorrect. It should be 12.7 instead of 12.6.
- Shortbread cookie: listed as 1 oz noncreditable on the production record but should be counted as 0.75 oz eq. Grain based desserts credit towards the meal pattern requirements.

Wednesday, October 17, 2018 Lunch

- Tomato paste is listed in pounds but should be cans.
- Crushed tomato is listed as 5 cans but it should be 5.13 cans. Amounts cannot be rounded down. When amounts are rounded down, not enough food would be prepared.

Thursday, October 18, 2018 Lunch

- Chicken Nuggets: the production record lists 4 pieces for Pre-K and 5 pieces for grades K-6. However, the amount needed was calculated as if the Pre-K portion size was 3 pieces and K-6 was 4 pieces. The total amount of pieces needed should have been 2,886 pieces instead of 2,306 pieces.

Friday, October 19, 2018 Lunch

- Baked Chicken: flour is used to coat the chicken. The flour provides 0.25 oz eq grain.

Tuesday, October 23, 2018 Lunch

- Ground Beef: the production record lists 85/15 but 80/20 was used. The Per 100 Factor is incorrectly listed on the production record as 12.6. The factor for 80/20 is 12.7. Since the amount needed was not enough, the ground beef was credited as 1.25 oz eq instead of 1.5 oz eq. This means that the minimum daily meat/meat alternate requirement was not met for Pre-K (short 0.25 oz eq).

Thursday, October 25, 2018 Lunch

- Roll: the production record has planned for numbers for PreK-6 but should not because the bun was served for the cheeseburger.

Wednesday, October 31, 2018 Lunch

- Popcorn Chicken: 9 pieces equals 1.5 oz eq M/MA. The contribution for Pre-K is listed on the production record for 1 M/MA but should be 1.5 oz eq.



### Program Year 2019

#### Corrective Action:

1. Revise the cycle menu by:
  - Adding 1/8 cup of vegetable to the Chicken Tenders lunch. The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.
  - Adding 1/8 cup vegetable to the Pizza lunch to meet the minimum daily vegetable requirement of 3/4 cup vegetables for a K-8 menu.
  - Submit the revised cycle menu and production record templates demonstrating the meals meet the minimum daily vegetable requirement.
2. Make all of the appropriate corrections to the production record templates, serving site daily record templates, and recipes. Production records must show how the offered meals contribute to the required food components and food quantities for each meal served to each grade group every day. Ensure the corrections meet the meal pattern requirements. Submit the revised documents to demonstrate the changes listed above were corrected.
3. Train the food service manager and all food service staff on how to complete the production record and serving site daily record to ensure the documentation is completed correctly and ensure the meals meet the meal pattern requirements.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### General Program Compliance - Aliamanu Elementary (203)

#### 812. Meal service observation – Program benefits available to all with no discrimination?

#### Finding 9000: Civil Rights - Medical Statements

Aliamanu Elementary is using the old J-1 form (from 2014). Medical Diagnosis is no longer allowed to be requested - school should be using revised form as it does not ask for Medical Diagnosis.

#### Corrective Action:

1. The school must use the SFA's current J-1 form that does not require the written medical statement to provide a specific diagnosis by name.
2. Ensure all appropriate staff involved with the process of providing meal accommodations to students (including those who distribute the J-1 form) are using the SFA's current J-1 form. Provide the date that the current J-1 form is being implemented at the school.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

#### 1106. Fundraisers – observe State defined limits?



Program Year 2019

**Finding 9000: Other Finding**

The school is not meeting USDA Smart Snacks guidelines nor BOE Policy 103-7.

The school has a number of fundraisers. The following items that have been sold do not meet the USDA Smart Snack standards:

- Rice Krispies Treats
- Goldfish
- Fruit by the Foot
- Candy Canes
- Jamba Juice

The school needs to discontinue the sale of these items or sell these later in the day (30 minutes after school ends).

Documentation was not provided during the onsite review to show the following items meet the USDA Smart Snack standards:

- Kona Shave Ice

All foods and beverages sold on the school campus (excluding reimbursable meals), during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day), must meet regulatory requirements. This includes a la carte items sold during meals, and foods/beverages sold in vending machines, school stores, and any other venue. Also, foods and beverages sold during fundraisers must meet the Smart Snacks Standards, unless these items are not intended for consumption at school or are otherwise exempt by the State agency.

**Corrective Action:**

1. Train school staff that are responsible for the approval of any fundraisers on the USDA Smart Snacks Standards.
  2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
  3. Explain what action has been taken to ensure that the sale of all food/beverages on campus, during the school day, meet the USDA Smart Snacks Standards. Provide supporting documentation.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Food Safety**

Food items are not labeled or dated. There were proportioned canned fruit and smoothies that were not labeled or dated in the walk-in refrigerator. Cases of product were not dated in the reach-in freezer.

**Corrective Action:**

1. Train all food service staff to label and date items that are removed from the original packaging and are stored in bags, pans, or containers.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



**Hawaii Department of Education**

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**SNP Administrative Review Findings**  
*Program Year 2019*

**DOE School Food Services Branch (1434-6)**





# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Chiefess Kamakahahelei Middle (448)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: February 21, 2019

#### Commendations

\* Chiefess Kamakahahelei Middle

- Documents were well organized and ready for reviewers upon arrival on Thursday
- Food service line was clean and food looked appetizing
- School staff extremely responsive and open to reviewers' suggestions and requests
- Kitchen is clean and organized

\* Fiscal

- Thank you for having all requested documents ready and organized
- Great job on correctly categorizing object codes on the ATP (i.e. cafeteria supplies, custodial supplies)
- Deposit slips matched Manager's Summary Reports
- Inventory was terrific! There was evidence that First-In, First-Out (FIFO) was being followed. The inventory items were labeled with the arrival date of the product. Inventory matched inventory cards.
- Payroll Certifications were completed correctly

#### Technical Assistance

\* General Program Compliance: Food Safety - Equipment Temperatures

Explained that whenever the equipment temperatures are out of range, corrective action must be documented. Corrective action includes recording the temperature half an hour later. If the temperature is still out of range, the School Food Services Supervisor told the manager to contact someone to get the equipment repaired.

\* General Program Compliance: Production Records and Recipes

Reviewed the issues found with the production records and recipes with the manager and SFS Supervisor.

\* General Program Compliance: Recordkeeping

Explained that all records, including training records, must be kept for 6 years plus the current year per Hawaii DOE policy.

\* General Program Compliance: Food Safety - Employee Food Items

Food for staff was found in the reach-in refrigerator. Informed the manager to designate and label a particular section that staff can use for personal use. The SFS Supervisor explained that the manager put a bus pan in the refrigerator and label it Employees Only or something similar.



### Program Year 2019

#### \* General Program Compliance: Offer vs Serve

Offer vs Serve: staff were able to correctly answer that a reimbursable lunch consists of three components, and one must be either a fruit or vegetable. One of the meal clerks thought that meat/meat alternate was required. Explained that meat/meat alternate is not required as long as the student has at least three components and one is at least ½ cup fruit or vegetable. For example, a student could take the fruit, vegetable, and milk and have a reimbursable meal.

#### \* General Program Compliance: Smart Snacks

Explained to the manager that food/beverages sold to students immediately after school ends must meet the USDA Smart Snacks standards. Food/beverages sold after 30 minutes after the school day ends does not meet the USDA Smart Snacks standards.

Fundraisers - items sold to students must meet the USDA Smart Snacks standards. This includes the sale of tickets that are used to later exchange for food items.

#### \* Food Safety - Equipment Temperatures

Explained that whenever the equipment temperatures are out of range, corrective action must be documented. Corrective action includes recording the temperature half an hour later. If the temperature is still out of range, the School Food Services Supervisor told the manager to contact someone to get the equipment repaired.

#### \* Production Records and Recipes

Reviewed the issues found with the production records and recipes with the manager and SFS Supervisor.

#### \* Recordkeeping

Explained that all records, including training records, must be kept for 6 years plus the current year per Hawaii DOE policy.

#### \* Food Safety - Employee Food Items

Food for staff was found in the reach-in refrigerator. Informed the manager to designate and label a particular section that staff can use for personal use. The SFS Supervisor explained that the manager put a bus pan in the refrigerator and label it Employees Only or something similar.

#### \* Offer vs Serve

Offer vs Serve: staff were able to correctly answer that a reimbursable lunch consists of three components, and one must be either a fruit or vegetable. One of the meal clerks thought that meat/meat alternate was required. Explained that meat/meat alternate is not required as long as the student has at least three components and one is at least ½ cup fruit or vegetable. For example, a student could take the fruit, vegetable, and milk and have a reimbursable meal.

#### \* Smart Snacks

Explained to the manager that food/beverages sold to students immediately after school ends must meet the USDA Smart Snacks standards. Food/beverages sold after 30 minutes after the school day ends does not meet the USDA Smart Snacks standards.

Fundraisers - items sold to students must meet the USDA Smart Snacks standards. This includes the sale of tickets that are used to later exchange for food items.



Program Year 2019

\* Fiscal

- Found DOE Form(s) 10-B Record of Small Purchase that were not signed by the employee or Administrator. Please ensure that all 10-Bs are completed correctly.
- Per federal regulations, monies from School Food Service Branch (SFSB) account cannot pay any delinquent fee(s). I did not find evidence of delinquent fees but I found invoices that were paid late. If the cafeteria had incurred delinquent fees; the school's general funds would have to pay the fees. To avoid any delinquent fees, invoices should be paid in a timely manner. Invoice(s) stated payment is due "Net 30-day"
  - o Yhata invoice dated 2/16/18 and ATP was processed on 3/29/18
  - o Yhata invoice dated 2/22/18 and ATP was processed on 3/29/18.
  - o Rutan Refrigeration and Air Condition due by 3/3/18, paid on 3/29/18
- Invoice states, Past due accounts may be subject to a service charge of 1.5% per month (annual rate of 18%)

Meal Components & Quantities - Chiefess Kamakahalei Middle (448)

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

**Finding 9000: Meal Components and Quantities - Day of Review**

February 21, 2019 (Hot Dog) lunch production record lists the WG cookie as 1 oz and non-creditable. A cookie is considered a grain-based dessert. The cookie counts toward the grain requirement. Also, according to the recipe, 1 cookie provides 0.5 oz eq grain, not 1 oz. The production record was corrected onsite to list one cookie provides 0.5 oz eq grain.

**Corrective Action:**

The production record was revised during the onsite review. No further action required.

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

**Finding 9000: Meal Components and Quantities - Review Period**

The week of October 1-5, 2018 was selected for review. It was found that the meal pattern requirements were not met this week. Therefore, the rest of October was reviewed. The issues that were found are listed below:

Tuesday, October 2, 2018 Lunch (Nachos)

- Chili: 80/20 ground beef was used. The chili recipe and the production records lists 85/15 ground beef. Since 80/20 ground beef was used, the M/MA contribution is 1.75 oz eq per serving, not 1.75 oz eq. Also, the Per 100 Factor used on the production record for ground beef needs to be corrected to 17.00 instead of 16.80. Production record was corrected onsite to list 80/20 ground beef and the Per 100 Factor as 17.
- Tortilla Chips: the production record lists 2 grain as the contribution but the school serves 14-18 chips per serving. 14 chips provides 1 oz eq grain. Production record was corrected onsite to list 1 grain as the contribution and 15 chips as the serving portion.

Wednesday, October 3, 2018 Lunch (Chicken Tenders)

- Minimum daily vegetable requirement was not met (short 1/8 cup)
- Chicken Tenders: production record lists the incorrect crediting amount. 3 pieces provides 1 oz. eq. grain, not 0.75 oz. eq. Production record was corrected onsite to list the contribution as 1 grain.

Friday, October 5, 2018 Lunch (Purchased Pizza)

- Pizza: include on the production record that the pizza provides 2 oz eq M/MA and 1/8 cup red/orange vegetable. Production



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### DOE School Food Services Branch (1434-6)

#### Program Year 2019

record was corrected onsite to list the contribution of one slice of pizza as 2 M/MA and 1/8 cup red/orange vegetable.

#### Tuesday, October 16, 2018 Lunch (Hot Dog)

- WG Cookie: this is considered a grain-based dessert. The cookie counts toward the grain requirement. Also, according to the recipe, 1 cookie provides 0.5 oz eq grain, not 1 oz. Production record was corrected onsite to list the grain contribution as 0.5 oz.

#### Wednesday, October 17, 2018 Lunch (Creole Mac)

- Ground beef: 80/20 ground beef was used. The recipe and production record list 85/15 ground beef. Since 80/20 ground beef was used instead, the M/MA contribution is 1.75 oz eq, not 2 oz eq. Also, the Per 100 Factor used on the production record for ground beef needs to be corrected to 17.00 instead of 16.80. Under serving portion, #8 is listed for ground beef and pasta. Production record was corrected onsite to list 80/20 ground beef and 2 M/MA as the contribution, 2 oz as the serving size, 17 as the Per 100 Factor, and 8 oz as the serving portion to match the measurement listed on the recipe.

#### Thursday, October 18, 2018 Lunch (Beef Stew)

- Beef stew: the production record lists 4 oz as the serving portion. This is inconsistent with the recipe that lists 8 oz. Production record was corrected onsite to list 8 oz as the serving portion.

#### Friday, October 19, 2018 Lunch (Chicken Pasta)

- Grilled Chicken Strips: 2.35 oz of chicken = 2 oz eq M/MA. According to the amount listed in the Amount Needed column, it appears the planned portion was 2 oz, not 2.35 oz. A 2 oz portion provides 1.5 oz eq M/MA. Production record was corrected onsite to list 2.35 oz as the serving size and 14.69 as the Per 100 Factor.

- Penne Pasta: the production record lists ¾ cup as the serving size and 1.25 grain as the contribution. A ¾ cup portion of pasta credits as 1.5 oz eq, not 1.25 oz eq. Production record was corrected onsite to list ½ cup of pasta and 1 grain contribution.

#### Monday, October 22, 2018 Lunch (Chili and Potato Wedge)

- Chili: 80/20 ground beef was used. The chili recipe lists 85/15 ground beef. Since 80/20 ground beef was used instead, the M/MA contribution is 1.25 oz. eq. per serving, not 1.5 oz. eq. Also, the Per 100 Factor used on the production record for ground beef needs to be corrected to 12.7 instead of 12.6. The serving utensil listed is 4 oz, but the recipe lists 4 oz heaping. Production record was corrected onsite to list 12.7 as the Per 100 factor. Also, 4 oz heaping was added as a note on the production record. The recipe still needs to be corrected.

#### Tuesday, October 23, 2018 Lunch (Noodles and Egg Roll)

- Yangs Chow Mein Noodles contains bleached wheat flour which is not whole grain or enriched. This product does not meet the whole grain-rich criteria. Find an alternate whole grain-rich product.

- Grilled Chicken Strips: 2.35 oz of chicken = 2 oz eq M/MA. The production record lists 1 oz as the serving size and 1 oz as the contribution. When 1 oz of chicken is served, the M/MA contribution is 0.75 oz eq, not 1 oz eq. Production record was corrected onsite to list 1.18 oz as the serving size.

#### Wednesday, October 24, 2018 (Chicken Tenders)

- Chicken Tenders: the grain crediting is incorrect on the production record. 3 pieces = 1 oz. eq. grain, not 0.75 oz. eq. Production record was corrected onsite to list 1 grain as the contribution and 1/8 cup of carrots was changed to ¼ cup of carrots. Also, the Per 100 Factor was changed to 10.20 for the ¼ cup of carrots.

#### Friday, October 25, 2018 (Purchased Pizza)

- Pizza: include on the production record that the pizza provides 2 oz eq M/MA and 1/8 cup red/orange vegetable.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

Production record was corrected onsite to list 2 oz M/MA and 1/8 cup red/orange vegetable.

Monday, October 29, 2018 (Turkey Pastrami)

- Turkey Pastrami: size of serving listed on the production record is 2 oz. This is not consistent with the note to serve 3.2 oz under the Serving Portion column. Production record was corrected onsite to list 3.2 oz as the portion size.

Tuesday, October 2, 2018 (Turkey Ham)

- Turkey Ham: 2 oz turkey ham = 1 oz eq M/MA. The production record lists the serving size as 1 oz and the contribution as 1 oz. According to the Amount Needed column, the serving size should be 1.69 oz and 0.75 oz eq as the contribution.

Production record was corrected onsite to list 2 oz as the portion size and 12.50 as the Per 100 Factor.

#### Corrective Action:

1. Revise the cycle menu by adding 1/8 cup of vegetable to the Chicken Tenders lunch. The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables. Submit the revised cycle menu and production record template demonstrating the meal meets the minimum daily vegetable requirement.
2. Provide documentation on the alternate whole grain-rich product that will be served in place of the Yangs Chow Mein Noodles (noodles and egg roll lunch).
3. Make all of the appropriate corrections to the recipes. Submit the revised recipes to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

### General Program Compliance - Chiefess Kamakahalei Middle (448)

811. Justice for All poster displayed in prominent location?

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

Any document that mentions the USDA child nutrition programs must include the most current nondiscrimination statement. The following issues were found:

- The nondiscrimination statement on the school's website (Under 'Parents --> Lunch Payments --> Discrimination Statement) contains a line on the bottom that reads 'This, at the very least, must be on all documents pertaining to school meals programs.' Remove this line as it is not part of the statement itself. Additionally, the nondiscrimination Statement on the 'Healthy Breakfast' handout that promotes school breakfast (page 5 of issue 1 and page 5 of issue 3) is incorrect.
- The nondiscrimination statement was not included on the monthly newsletter, issue 7 page 5 and issue 1 page 2, both of which mention the school breakfast program.

#### Corrective Action:

1. Use the most current nondiscrimination statement on all program materials. The current nondiscrimination statement is available at: <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>
2. Provide a copy of program materials demonstrating the corrections were made.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



**Program Year 2019**

1106. *Fundraisers – observe State defined limits?*

**Finding 9000: Smart Snacks - Fundraisers**

Based on the documentation provided to reviewers (Form 422 - Money-Raising Activity), the school had fundraisers in which tickets were sold for items such as cookies, pizza, kulolo, and hummus. Not enough information was provided to determine if the fundraisers occurred during the school day, on the school campus, and if the items were sold to students.

All foods and beverages sold on the school campus (excluding reimbursable meals), during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day), must meet regulatory requirements. This includes a la carte items sold during meals, and foods/beverages sold in vending machines, school stores, and any other venue. Also, foods and beverages sold during fundraisers must meet the Smart Snacks Standards, unless these items are not intended for consumption at school or are otherwise exempt by the State agency.

**Corrective Action:**

1. Train school staff that are responsible for the approval of any fundraisers on the USDA Smart Snacks Standards.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

1408. *Temperature logs available?*

**Finding 9000: Food Safety - Equipment Temperatures**

Temperature logs from August 2018 noted temperatures that were out of range (Aug. 8: 46F, Aug. 9: 45F, Aug. 28: 45F – all at 6:00am) and no noted corrective action was taken. Additionally, temperature logs from August appeared to be pre-populated with times (6:00 am and 2:00 pm; October's logs were hand-written. Manager stated that this was corrected. Staff are now writing the times. On February 20, 2019, the walk-in refrigerator log also indicated a high temperature (42F at 6:00am) with no corrective action noted.

Technical assistance was provided - explained that whenever the equipment temperatures are out of range, corrective action must be documented. Corrective action includes recording the temperature half an hour later. If the temperature is still out of range, the School Food Services Supervisor told the manager to contact someone to get the equipment repaired.

**Corrective Action:**

1. Train all food service staff on the standard operating procedure on storing food properly and proper temperature control. Train all food service staff on how to take necessary corrective action when temperatures are out of range.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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



### Program Year 2019

#### **Finding 9000: Food Safety - Food Storage Issues**

The following storage issues were found during the on-site review:

- Bag of kim chee was not labeled in the reach-in refrigerator (it was confirmed to belong to a kitchen employee). All items should be clearly labeled and dated. This was corrected on site – a bus pan that was clearly labeled 'Staff Items' was added to the reach-in refrigerator.
- Pans of fruits and vegetables in the walk-in refrigerator were not labeled or dated. This was corrected during the onsite review.
- Pans of hot dogs were not covered, labeled or dated. This was corrected during the onsite review.
- Caesar dressing was labeled 7/23/18. The manager stated that the food service staff made the dressing last week and did not change the label. This was corrected during the onsite review.

#### **Corrective Action:**

1. Train all food service staff to label and date items that are removed from the original packaging and are stored in bags, pans, or containers.
2. Train all food service staff to store any personal food items in the bus pan that is in a designated location in the reach-in refrigerator.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

### 1502. Records retained for 3 years?

#### **Finding 9000: Recordkeeping**

The food service manager only has training documentation for the current school year (SY 18-19) and the prior school year (SY 17-18). Per Hawaii DOE guidelines, records must be retained for a period of 6 years plus the current school year. Please keep in mind that records must be retained beyond this period, if any audit findings have not been resolved.

#### **Corrective Action:**

1. Retain all program records for at least 6 years plus the current school year, or longer, until the resolution of any audits.
2. Submit a Standard Operating Procedure (SOP) on how the school will retain records to meet the recordkeeping requirement.
3. Train all appropriate staff on the SOP. Submit training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Ewa Elementary (253)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: January 22, 2019

#### Commendations

\* AR Documentation

Documents are well-organized and complete.

\* School Staff

Staff were friendly and attentive.

\* Meal Presentation

Apples were cut during lunch meal service on Wednesday, 1/23/19, which is easier to eat for younger kids and look more appealing and NO STICKERS!

\* Satellite Kitchen Storeroom

Campbell High storeroom was clean and spotless; kitchen staff observed practicing proper food safety protocols (gloves, hair net, etc.)

\* Accommodations for Reviewers

Thank you for accommodating our review team with parking and adequate workspace.

\* Fiscal

- Thank you very much for having all of the requested documents ready and organized!
- Great job correctly itemizing & categorizing invoices with the appropriate object codes.

#### Technical Assistance

\* Civil Rights Complaint Logs

Civil Rights Complaint Logs were provided for SY 2017-2018 and 2018-2019, however the information requested on the logs are insufficient (only shows a table that requests Name and Signature). TA was provided and the SA shared the Civil Rights Complaint Log template that is posted on the HCNP website.

\* Civil Rights Complaint Procedure

The school could not provide a procedure for handling Civil Rights complaints. The school provided its "School Information" handout, which includes the disclaimer that instructs people to direct HODOE nondiscrimination policies to the Civil Rights Compliance Office. This is not acceptable. The SA shared the Complaint Procedure Flowchart that is posted on the HCNP website to use as a template.





## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

##### \* Food Safety Inspection Report

The food safety inspection report that was posted in the cafeteria was dated 4/12/18. It was noted that a copy of a more recent food safety inspection report was included in the binder of materials provided. TA was provided that the most recent copy of the food safety inspection must be posted. This was corrected onsite.

##### \* ASP and Shelf-Stable Products

Afterschool Snack Program -- explained to A+ staff (Jocelyn) that shelf-stable products that are from the sharing table may be served to the students who come to A+ late since they report to tutoring first since the computer POS system is returned to the office after snack service is complete. SFSB Supervisor needs to provide more technical assistance on what products are shelf-stable since the SFSB Supervisor mentioned that not all snacks served are shelf-stable.

##### \* Onsite Monitoring

Onsite Review -- only one form was completed for the onsite review for both SBP and NSLP. TA was provided to the Supervisor that one form must be completed for each program.

A review form from last school year was provided by SFSB (dated 1/30/18). This review was completed by a different Supervisor and on an older version (dated 5/2013) of the MC-7 form. Again, only one form was completed for both SBP and NSLP. Also, question #3 and 5 were not completed under the Meal Service section regarding OVS. All review forms should be completed on the most current version of the form and in its entirety.

##### \* Meal Service Operations Do Not Match Renewal Application

The SY 2018-2019 renewal application shows that meals are not served in locations other than the regular dining area. Pre-K lunch was served in two separate classrooms. TA was provided to the Supervisor to update the renewal application. This was corrected onsite.

##### \* Planned Menu Item Not Served

Edamame was listed on the production record for lunch on 1/22/19, however it was not served on the day of review.

##### \* Fiscal

Provided Technical Assistance:

When paying for invoices, ensure that the correct object codes are being used and amounts are entered correctly.

ATP 08292017 091931: Payment VS048353 Y. Hata invoice 2877936 was for USDA food, but wrong object code 3303 Food Provision was used, instead of 3602 Freight & Delivery Charges.

ATP 08282017 113059: Payment VS046260 Meadow Gold, the invoice shows \$1,578.50, but ATP shows \$1,578.00 paid to vendor.

Payment VS046285 Finest Food, the credit memo shows -\$66.60, but ATP shows -\$60.60.

11/15/2018 Deposit slip (\$925.00) did not match the Manager's Summary (\$925.75).



Program Year 2019

Suggestions

\* Efficiency of Meal Service

It was observed that serving lines were delayed during lunch service on 1/22/19. More team work from the servers could prevent this. On one side, meal service stopped when a worker left the line to get more fruit/vegetables or to take a dirty pan to the dishroom for cleaning. The second server should have picked up the slack and served the stew as there were already 4 places with rice on them already. Further, instead of leaving the serving line, the gentleman should have had either of the two students assisting (neither was doing much), he should just had the empty pan to one of them to run back to the pot washer thus preventing stoppage in serving.

\* Equipment Temperatures

While food temperatures were taken at both the prep site (Campbell High) and the site of review (Ewa EI), equipment temperatures (walk-in, reach-in) were only logged once daily. Suggest using same practice with equipment (take temperature twice per day).

\* Fiscal

Make sure that Approval to Pay (ATP) are completed correctly:

ATP 08292017 091931:

· Payment VS048353 Y. Hata invoice 2877936 was for USDA food, but wrong object code 3303 Food Provision was used, instead of 3602 Freight & Delivery Charges.

ATP 08282017 113059:

· Payment VS046260 Meadow Gold, the invoice shows \$1,578.50, but ATP shows \$1,578.00 paid to vendor.  
· Payment VS046285 Finest Food, the credit memo shows -\$66.60, but ATP shows -\$60.60.

· 11/15/2018 Deposit slip (\$925.00) did not match the Manager's Summary (\$925.75).

· School Food Services Program Certificate for Ewa #1 and Ewa Pre-Plus student breakfasts does not match the monthly total from the Serving Site Multi-Use Daily Record.

· Serving Site Multi-Use Daily Record total order does not match the beginning count on 11/21/18 for Ewa #1 breakfast and Ewa Pre-Plus breakfast.

Other Federal Programs - Ewa Elementary (253)

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

**Finding 9000: Other Finding**

Production Records for the week of review (Oct. 1-5) and Edit Check worksheets show large discrepancies between meals served. For example, Tuesday, October 2nd snack (marshmallow square, fruit juice) Production Record shows 281 snacks served, while the Edit Check worksheet states 124 meals served.



Program Year 2019

**Corrective Action:**

1. Identify the cause for the discrepancies between the Afterschool Snack Service production records and edit check worksheets.
2. Provide training to appropriate staff on completing production records, meal counting, identifying reimbursable snacks, and forecasting for preparing meals.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

9. On-site observation – snacks properly prepared, held served and stored?

**Finding 9231: Snacks are not properly prepared, held, served, and stored according to the SFA's HACCP/food safety plan.**

Numerous ants were observed on the sharing tables. Sharing tables should be cleaned and sanitized before snack service.

**Corrective Action:**

1. Provide training to appropriate staff (including Afterschool Snack Service staff) on food safety and sanitation.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

**Meal Counting & Claiming - Ewa Elementary (253)**

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

**Finding 9000: Other Finding: Meals not counted at the POS**

Pre-K lunch service was observed on Tuesday, 1/22/19. In one classroom, the children were being checked on list while the meals were being passed out and the milk was served after the meals were passed out. Meal counting must be done only when the child has received a complete reimbursable meal.

**Corrective Action:**

1. Provide training to appropriate staff on proper meal counting and claiming procedures. Meal counting must be done only at the point of service, when the child has received a reimbursable meal.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

**Meal Components & Quantities - Ewa Elementary (253)**

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



***Program Year 2019***

**Finding 9002: Meal components missing on Day of Review.**

As observed on the Day of Review, required meal components were not available on every reimbursable meal service line to all participating students. The meal service line was missing components during part of the meal service. Fruit was not available for two students. Fruit and salad were not available for five students. A total of 7 lunches will be disallowed since not all components were available.

**Corrective Action:**

1. Provide training to appropriate staff on meal pattern requirements.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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

**Finding 9000: Other Finding: Production Records (Day of Review)**

The following issues were noted on the Lunch production record for the day of review (1/22/19):

- The amount of celery needed is not enough. 57# of sliced, cooked celery or 53# of diced, cooked celery is needed to get 60 – 1/8 cup and 851 – 1/8 cup servings in the Beef Stew.
- The amount of potatoes needed is not enough. 99# of diced, frozen potatoes is needed to get 60 – 1/8 cup and 851 – 1/4 cup servings in the Beef Stew.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



Program Year 2019

**Finding 9000: Other Finding: Production Records (Review Period)**

The following issues were noted on the breakfast and lunch production records from the review period:

Breakfast:

- Tuesday (10/2/18), Thursday (10/4/19): on the production record, the cereal is credited as a meat. Cereal should be credited as a grain.

Lunch:

- Monday, 10/1/18: it is unknown where the per 100 factor for the romaine lettuce was obtained

- Wednesday, 10/3/18: The production record shows that the chicken patty is a 3.54 oz serving that provides 2 M/MA and 3/4 grain (cups? oz eq?). The CN label for the chicken catty states that each patty weighs 3.54 oz and provides 2 oz M/MA and 1 oz eq grain. The amount of oranges needed is not enough. 131.43 lbs of oranges is needed to get the 368 – 1/2 cup servings listed on the production record.

- Friday, 10/5/18: The cabbage that is being used on the production record is for cabbage, chopped w/dressing. The cooked, drained version should be used. The amount of rice needed is not enough. 3.43# of rice is needed to get 60 – 1/4 cup servings, and 105.26# is needed to get 921 – 1/2 cup servings.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

501. Cafeteria staff trained on OVS?

**Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.**

During lunch meal service on January 22, the POS cashier was unable to correctly answer an OVS question for the meal being served. When asked if students had to take milk (in addition to the beef stew and rice that were bundled), she responded that they did so that they would meet the requirement of having 3 components. This is incorrect because the beef stew credits as both vegetable and meat/meat alt. and the rice credits as grain; therefore, the meal is reimbursable even if the child decided to take no additional item (milk included).

As a result of not knowing OVS requirements for lunch on January 22, the cashier charged at least 9 meals as 'non-reimbursable' because the students did not take milk, despite having the beef stew and rice.

**Corrective Action:**

1. Provide training to meal clerks on OVS requirements and identifying reimbursable meals.

2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



Program Year 2019

Technical Assistance:

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

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

**Finding 9000: Other Finding: OVS signage did not display all menu items**

OVS signage during breakfast on 1/23/19 did not show the cereal and yogurt that were available during meal service. OVS signage should display all items that are being served.

**Corrective Action:**

1. Make all of the appropriate corrections to OVS signage. Ensure that all of them items being served during meal service are listed, and that OVS signage shows students how to select a reimbursable meal.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

General Program Compliance - Ewa Elementary (253)

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Signage does not include the current nondiscrimination statement.**

Breakfast Policy signage does not have non-discrimination statement. Because the sign contains information related to the School Breakfast Program (prices of meals, meal charge policy), it must contain the non-discrimination statement.

**Corrective Action:**

1. Make all of the appropriate corrections to the Breakfast Policy signage.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Special Diets**

The school provided medical statement forms (J-1) for students requiring special diets. The form that was used is not the current form (dated 5/23/14). Ensure that the most current form is being used.



***Program Year 2019***

**Corrective Action:**

1. The school must use the SFA's current J-1 form that does not require the written medical statement to provide a specific diagnosis by name.
2. Ensure all appropriate staff involved with the process of providing meal accommodations to students (including those who distribute the J-1 form) are using the SFA's current J-1 form. Provide the date that the current J-1 form is being implemented at the school.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*1407. SFA written food safety plan implemented?*

**Finding 9000: Other Finding: Food Safety Documents**

The 25 statements in the "Flow Chart For All Frozen Foods" is very poorly written and needs to be revised and dated.

There is inaccurate information in the document: For example, # 7 states that spaghetti must be cooked the day before. It is HCNP's understanding that since the Food Borne Outbreak in 2013, that SFSB no longer allows the noodles to be cooked the day before. Further, the document omits how the noodles are to be reheated the next day and held until it is placed in spaghetti sauce. Cafeteria staff explained that no official memo has been sent out on SOP for spaghetti.

**Corrective Action:**

1. Revise the "Flow Chart For All Frozen Foods" as described above. Submit the revised flow chart.
2. Include the corrected flow chart in the written food safety plan and provide training to appropriate staff.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

*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.**

Proper HACCP principles not observed: food temperatures are not adequately monitored. Refrigerator and freezer temperatures are not adequately monitored. On the day of review (Lunch, 1/23/19), staff were observed taking food temperatures after the lunch monitors had been served. This is not acceptable. Temperatures should be read upon receipt of delivery to ensure that temperature was maintained throughout transport.

The hot boxes on one side of the kitchen were plugged in prior to meal service, but the hot boxes on the other side of the kitchen were not plugged in when meal service was about to begin. The SA reviewer notified a staff member, and the hot box was then plugged in.

Equipment temperature logs from SY 18-19 (Sep, Oct, Nov, Dec, Jan) were reviewed. Multiple instances of equipment being out of temperature ranges were noted. For example, January logs showed the reach-in refrigerator had a temperature of 51 F at 6:57 am on 1/14 (refrigerator should be at or below 41 F). The logs failed to indicate whether corrective action was taken.

**Corrective Action:**

1. Train appropriate staff on the food safety plan. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide.





## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### George Washington Middle (152)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: March 12, 2019

#### Commendations

##### \* Washington Middle

Documents were organized and ready for the reviewers upon arrival.

Food safety plan is very well-maintained and thorough.

During lunch service, students are able to make their own selection when building a reimbursable meal since all menu items are offered – there is no pre-plating.

##### \* Fiscal

· Thank you for having all requested documents ready and neatly organized

· Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

· Deposit slips matched Summary Reports

#### Technical Assistance

##### \* Meal Counting & Claiming: OVS - Identifying a Reimbursable Lunch (Washington Middle)

Technical assistance (TA) was provided to the meal clerks on identifying a reimbursable lunch (example: baked beans contribute to the vegetable meal component) and meals must contain at least 3 components, one of which is ½ cup fruit/vegetable. TA was also provided that meal clerks should encourage students to take a ½ cup fruit or vegetable at lunch rather than just counting meals as non-reimbursable.

##### \* OVS - Identifying a Reimbursable Lunch (Washington Middle)

Technical assistance (TA) was provided to the meal clerks on identifying a reimbursable lunch (example: baked beans contribute to the vegetable meal component) and meals must contain at least 3 components, one of which is ½ cup fruit/vegetable. TA was also provided that meal clerks should encourage students to take a ½ cup fruit or vegetable at lunch rather than just counting meals as non-reimbursable.

##### \* Fiscal

Just a reminder: any items purchased that are not on a price list, a DOE Form 10-B Record of Small Purchase must be fully completed. Newest version rev. 6/2018.

#### Suggestions

##### \* And Justice For All Poster (Washington Middle)

The nondiscrimination “And Justice For All” poster in the front office is displayed on top of the cabinet next to the meal payment box. Suggest posting the poster on the bulletin board so that it is readily visible and easy to read. This was done on-site on the day of review.



Meal Counting & Claiming - George Washington Middle (152)

319. DOR - electronic system POS, excessive overrides used during meal service?

**Finding 9000: Meal Counting and Claiming**

Meal clerks must ensure each meal is reimbursable when counting meals. During the observation of lunch service, one of the meal clerks missed that a student did not have a reimbursable meal. The School Food Services Supervisor informed the meal clerk that the meal was not reimbursable and the meal clerk changed it in the POS to be a nonreimbursable meal.

The following issues were observed with the other meal clerk:

- The meal clerk needs to control her line better. Students at times quickly passed her to where she collected several of the students' temporary ID cards at once and then scanned them all at the same time. This repeated several times during meal service.
- There was also a student who did not have their ID. The meal clerk tried to look up the student's name and simultaneously tried to collect the temporary ID cards from other students. The SFSB Supervisor stopped her from collecting the temporary ID cards and told the students in the line to wait. The meal clerk needs to look at each tray to determine whether or not the meal is reimbursable so trying to find a student's name and collect the temporary ID cards is not acceptable.
- There was a student who flagged in the POS system as a visiting student – the meal clerk cancelled the transaction. The meal clerk did not ask for the student's name to charge the correct student for the meal nor did it appear that she was going to try to resolve the issue to prevent this from reoccurring again in the future.
- Another student flagged in the POS system for being the student's second meal but the meal clerk cancelled the transaction. When questioned why she did that, she explained that it was not the student's second meal. It is unclear how she knew it was not the student's second meal since it did not appear she asked the student nor did she check with the other meal clerk to make sure the student did not already take a meal from the other meal service line.
- Overall, the meal clerk needs to tell the students to stop if she needs more time to finish a transaction and she needs to look at each tray to determine whether each student has a reimbursable meal.

**Corrective Action:**

Train the meal clerks on meal counting and claiming, including how to identify whether or not the student has a reimbursable meal.

Provide a copy of the training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

Meal Components & Quantities - George Washington Middle (152)

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

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

As observed on the Day of Review, at least two required milk varieties were not available throughout the breakfast meal service. The school plates the two different breakfast entrée options with the fruit and milk. Some plates had white milk and some plates had chocolate milk. However, towards the end of meal service, two types of milk were not available for each entrée option for two students.



Program Year 2019

**Corrective Action:**

Train all food service staff that at least two allowable milk types must be available throughout the meal service.

Provide a copy of the training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Signage**

The monthly breakfast menu at the beginning of the serving line did not list the alternate breakfast option. This was corrected onsite.

**Corrective Action:**

No further action required. This was corrected during the onsite review.

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

**Finding 9000: Meal Components and Quantities (Review Period)**

The meal pattern requirements were met for the review period for breakfast and lunch but some of the information on the production records were not correct. The following issues were noted during the week of October 1-5, 2018:

Monday, October 1, 2018 Lunch

- BBQ Pork Patty: according to the CN label, one patty provides 2 oz eq M/MA but the production record lists 1 M/MA as the contribution. This was corrected onsite.

Tuesday, October 2, 2018 Lunch

- Cheese Pizza: according to the CN label, one slice provides 2 oz eq M/MA and 1/8 cup of red/orange vegetable but neither were listed on the production record. This was corrected onsite.

Thursday, October 4, 2018 Lunch

- Chili: the production record lists 85/15 ground beef but 80/20 ground beef was used. The Per 100 Factor for 85/15 ground beef was listed on the production record instead of the factor for 80/20 ground beef. The Per 100 Factor needs to be changed to 12.70 instead of 12.60. This was corrected onsite.

Friday, October 5, 2018 Lunch

- Hummus: one 2 oz portion of hummus provides 1/8 cup of vegetables, not 1/4 cup. The production record needs to be changed from 1/4 cup to 1/8 cup under contribution. This was corrected onsite.

Wednesday, October 3, 2018 Breakfast

- Tortilla: one tortilla is 45 grams which is equivalent to 1.5 oz eq grains. The production record lists 1 grain under contribution. This was corrected onsite.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

##### Corrective Action:

No further action required. All corrections were completed during the on-site review.

#### 501. Cafeteria staff trained on OVS?

##### Finding 9000: Offer vs Serve Training

Meal clerks need additional training on what makes up a reimbursable meal under Offer vs Serve. One of the meal clerks was unable to answer questions about Offer vs Serve correctly. A lunch with meat, grain, and milk is not reimbursable under Offer vs Serve since it does not contain ½ cup of fruit/vegetable. Also, the meal clerk did not know that beans are considered a vegetable. Explained the OVS requirements to the meal clerk. Highly recommend the manager review the menu with the meal clerks before the start of meal service so they understand what makes up a reimbursable meal.

##### Corrective Action:

1. Train food service staff on OVS. The USDA OVS Guidance for the National School Lunch and the School Breakfast Program for SY 15-16 is posted at <https://fns-prod.azureedge.us/sites/default/files/cn/SP41-2015av2.pdf>. USDA also has OVS Tip Sheets for available at: <https://www.fns.usda.gov/tn/offer-versus-serve-national-school-lunch-program-posters>.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

#### General Program Compliance - George Washington Middle (152)

#### 812. Meal service observation – Program benefits available to all with no discrimination?

##### Finding 9000: Medical Statement

School is using the old J-1 form (from 2014). Medical Diagnosis is not required and is no longer allowed to be requested. The school should be using revised form as it does not ask for Medical Diagnosis.

##### Corrective Action:

Immediately stop using the J-1 form from 2014. Use the revised form from the SFA that does not ask for Medical Diagnosis. Submit documentation to demonstrate the school is using the revised form and not the form from 2014.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

#### 1407. SFA written food safety plan implemented?

##### Finding 9000: Food Safety Plan

A few Standard Operating Procedures (SOPs) were last reviewed on 8/1/16 (Handling a Food Recall, Holding Hot and Cold PHFs, Receiving Deliveries). Technical assistance was provided to the School Food Service Manager that the food safety plan must be reviewed annually, at a minimum. SOPs must be dated and initialed after reviewing. This was corrected on site.

##### Corrective Action:

No further action required. This was corrected during the on-site review.



1408. *Temperature logs available?*

**Finding 9000: Temperature Logs - Cooking Temperature**

Cooking temperatures were missing for the ham link, fish, rice and baked beans on 1/25/19. In the comments section, "cook out sick" is written. Technical assistance was provided to the School Food Service Manager that it is not acceptable for staff to dismiss taking food temperatures due to a staff member being absent. Further, training logs indicate that all staff members were trained in using food thermometers, therefore all staff members should understand how to read and record food temperatures.

**Corrective Action:**

Retrain all food service staff on using food thermometers and documenting all hot and cold food temperatures on the temperature log daily.

Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the food service staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Hana High and Elementary (402)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: April 17, 2019

#### Commendations

- \* Meal Counting & Claiming: Attention to corrective actions

On the days of review, SFSM was receptive to TA and promptly addressed corrective actions.

- \* Meal Counting & Claiming: Water availability

Thank you for having a water cooler available for students. Very convenient and always cold!

- \* Meal Counting & Claiming: Meal quality

Students seem to enjoy the meals.

- \* Commendations

On the days of review, SFSM was receptive to TA and promptly addressed corrective actions.

Thank you for having a water cooler available for students. Very convenient and always cold!

Students seem to enjoy the meals.

#### Technical Assistance

- \* Smart Snacks Standards

The USDA defines the school day is midnight before school starts until half an hour after the school day ends. Therefore, any food/beverages sold during within this time frame must meet the USDA Smart Snacks standards.

- \* Medical Statement for Special Diets

Medical Diagnosis is no longer allowed to be requested - school should use the revised form as it does not ask for Medical Diagnosis.

- \* Corrections to Production Records

Production records indicate that chocolate milk is available to Pre-K at lunch. This is not allowed since Pre-K is not comingled with the older grades at lunch. The SFSM was previously notified about this issue and has been in the process of correcting all production records. Further TA was provided to the SFSM on the appropriate corrective action.

- \* Rounding on Production Records

Most production records list whole numbers in the Amount Needed column. It appears that the amounts are rounded up. Although this is acceptable, consider showing the decimals to help decrease the amount of leftovers.



**SNP Administrative Review Findings**

**DOE School Food Services Branch (1434-6)**

**Program Year 2019**

**\* OVS Training for Meal Clerk**

Reviewers observed that the meal counting assistant was telling students to take milk during breakfast. Since the school is implementing offer versus serve (OVS), milk is not required. TA was provided to the meal counter on what constitutes a reimbursable meal under OVS, however the meal counter will require OVS training.

**\* Alternate Breakfast Menu Items**

The alternate breakfast is not listed on the monthly and OVS menus for April. The monthly menu for May includes the alternate breakfasts. TA was provided to the SFMS to include the alternate breakfasts to both the monthly and daily OVS menu going forward.

**\* Fiscal**

**Late Payments:**

Per federal regulations, monies from School Food Service Branch (SFSB) account cannot pay any delinquent fee(s). I did not find evidence of delinquent fees but I found invoices that were paid late. If the cafeteria had incurred delinquent fees; the school's general funds would have to pay the fees. To avoid any delinquent fees, invoices should be paid in a timely manner.

Invoice(s) stated payment is due "Net 30-day"

- o Yhata invoice dated 5/7/18 and ATP was processed on 6/29/18
- o Yhata invoice dated 3/5/18 and ATP was processed on 6/29/18
- o Yhata invoice dated 3/26/18 and ATP was processed on 6/29/18
- o Yhata invoice dated 4/9/18 and ATP was processed on 6/29/18
- o Yhata invoice dated 4/23/18 and ATP was processed on 6/29/18
- o Yhata invoice dated 4/23/18 and ATP was processed on 6/29/18

**Inventory:**

Inventory on hand matched the inventory cards. Evidence of (First-In, First-Out) FIFO, and boxed inventory were dated. Remember any items taken out of the original box should be dated. Found 2 rusty Oyster Sauce cans dated 2/16/17 that should be discarded.

**Suggestions**

**\* Meal Counting & Claiming: Training for School Food Services Manager**

SFSM would benefit from additional training, including inventory planning/forecasting. Since the school is located in an outlying area, deliveries are infrequent and thus the kitchen may be more prone to running out of inventory. Non-perishable items should be kept on-hand and used as a substitution for out-of-stock items to avoid serving non-reimbursable meals.

**\* Training for School Food Services Manager**

SFSM would benefit from additional training, including inventory planning/forecasting. Since the school is located in an outlying area, deliveries are infrequent and thus the kitchen may be more prone to running out of inventory. Non-perishable items should be kept on-hand and used as a substitution for out-of-stock items to avoid serving non-reimbursable meals.

**Meal Counting & Claiming - Hana High and Elementary (402)**

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



Program Year 2019

**Finding 9000: Other Finding: Daily Plate Counts**

Formulas on the Daily Plate Counts sheet are incorrect and as a result do not match the POS reports. This was corrected onsite.

**Corrective Action:**

This was corrected onsite. No further corrective action required.

**Meal Components & Quantities - Hana High and Elementary (402)**

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

**Finding 9002: Meal components missing on Day of Review.**

As observed on the Day of Review, required meal components were not available on every reimbursable meal service line to all participating students. During breakfast, the school ran out of juice towards the end of meal service. 8 students did not have the option to take juice. Staff did not bring out another fruit.

**Corrective Action:**

1. Provide meal pattern training to all food service staff and meal counting so staff understand what makes up a reimbursable meal and why all food items must be available to all students on the meal service line.
2. Provide training to all food service staff on how to complete the production records, which includes forecasting correctly and ensuring enough food is prepared.
3. Provide meal counting training to all meal counting staff so staff understand what point of service means and that meals must be counted at the point of service.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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

**Finding 9052: Day of Review portion sizes insufficient.**

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review (Breakfast, 4/18/19):

- The toast appeared to be smaller than a 1 oz portion. School food service staff weighed two different pieces of toast and both weighed approximately 0.75 oz. Thus, the alternate toast and yogurt breakfast would have been non-reimbursable (would not meet the minimum grain requirement). A second piece of toast was added to the toast and yogurt plates before meal service began, thereby making all meals reimbursable, however, the recipe and/or meal service operations should be re-evaluated to ensure that all items meet the required portion sizes.
- The serving line ran out of juice towards the end of the second breakfast and the only fruit available was ½ cup of oranges, therefore the minimum requirement 1 cup of fruit was not available. 8 students did not have the opportunity to take juice. These meals will be disallowed.
- The portion size for the orange wedges were not consistent between the first breakfast service and the second breakfast service. Five wedges were served at the first service but six wedges were served at the second service.





***Program Year 2019***

**Corrective Action:**

1. Review and make corrections to the production record templates and recipes as needed. Ensure the meal pattern requirements are met after making the corrections.
2. Provide training to appropriate staff on meal pattern requirements and serving the correct portion sizes.
3. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



Program Year 2019

**Finding 9000: Other Finding: Recipe Yield and Crediting (Review Period)**

For the review period, recipes do not include standardized yields and do not match crediting information listed on the production records.

Breakfast:

- Multiple days: Crediting information is missing for the yogurt. This was corrected onsite.
- Tuesday, 10/2/18: Peaches: the total amount needed is 10 cans (not 7 cans). This was corrected onsite.
- Wednesday, 10/3/18: Breakfast smoothie: for the yogurt, the information on the production record does not match information on the recipe. Based on the information on the production record, 6 - #3 cans of pineapple juice are not enough to provide 152 – 3/8 cup servings. 9.91 - #3 cans is needed. Two other fruit items were available on this day, however since both were offered (not pre-plated) the meal with the smoothie did not meet the minimum daily requirement for fruit. Therefore, the entire month of October must be reviewed.
- Thursday, 10/4/18: Coffee cake: the recipe does not specify what type of flour is being used. The recipe for 48 – 1.45 oz pieces credits as 1 oz eq grain for Pre-K (not 1/2 grain). Therefore, a 2.9 oz piece for K-12 credits as 2 oz eq grain. Both issues were corrected onsite. The production record shows pork links, but the monthly menu shows turkey links.
- Friday, 10/5/18: Turkey ham: crediting info on the production record is incorrect. CN label information shows 2 oz turkey ham credits as 1 oz eq M/MA. Therefore, 1 oz of turkey ham credits as 0.5 oz eq M/MA for K-A. This was corrected onsite. The production record shows 100% fruit juice as one of the fruit options, but the monthly menu shows cranberries.

Lunch

- Tuesday, 10/2/18: The production record shows that 85/15 ground beef is being used, however 80/20 ground beef is being used. This was corrected onsite. The recipe for the chili uses kidney and refried beans, however the production record shows that only kidney beans are used. Manager confirmed that only kidney beans are used in production. Revise the recipe for the chili.
- Wednesday, 10/3/18: Breaded chicken tenders: grains crediting is incorrect. 3 pieces of chicken tenders credits as 2 M/MA and 1 oz G (not 0.75 G). The minimum daily requirement for vegetables was not met for grades K-8 (short 1/8 cup vegetable). Therefore, the entire month of October must be reviewed.
- Thursday, 10/4/18: The planned menu was not served on this day. It appears that the planned menu for Friday was switched with the menu for Thursday. The minimum daily requirement for vegetables was not met for this day for grades 9-12 (short 1/8 cup).

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



### Program Year 2019

#### **Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Since meal pattern requirements were not met for the week that was selected for the menu review, a review of menu documentation for the entire month of October 2018 was conducted.

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable.

Monday, 10/15/18:

- Crediting is missing for the corn and edamame. This was corrected onsite.
- Crediting of the recipe does not match crediting on the production record. The recipe provides 1/8 cup beans, 1/8 cup R/O vegetables and 1/8 cup additional vegetables.
- The minimum daily requirement for vegetables was not met for this day (short 1/8 cup for all grades).

Friday, 10/19/18:

- The recipe for the pizza dough provides 1.75 oz eq grain (not 2G) for PK-8 and 2.5 oz eq grain (not 3G) for 9-A. This was corrected onsite.
- Crediting is missing for edamame. This was corrected onsite.
- The production record shows that ½ cup fresh strawberries was not served to 9-A as planned, therefore the minimum daily fruit requirement was not met for this day (short ½ cup).

Monday, 10/22/18 (Lunch):

- Popcorn chicken: serving portion for K-A was changed from 12 pieces to 11 pieces. 11 pieces provides 1.75 oz eq M/MA and 0.75 oz eq grain. This resulted in not meeting the meal pattern:
  - The daily M/MA requirement was not met for grades 9-12 (short 0.25 oz eq).
  - The daily grain requirement was not met for grades 9-12 (short 0.25 oz eq).

Tuesday, 10/23/18 (Lunch):

- The daily M/MA requirement was not met for PreK-12.
- The Planned For amount was 300 meals. The Actual Served was 316 meals. The amount of pork butt used was the amount that was needed for 300 meals. The production record lists 12# were leftover. This is a concern because not enough meat was prepared but yet there was a large amount that was leftover.
- Sweet and Sour Pork recipe: the recipe is not standardized correctly and is not credited correctly. The recipe lists two different serving sizes but only one yield. The crediting for the larger portion – 6 oz is listed as 2 oz eq M/MA. However, according to the USDA Recipe Analysis Workbook, one 6 oz serving provides 1.25 oz eq. This would mean that the 5 oz serving would not provide 1.5 oz eq as listed on the recipe.
- The daily vegetable requirement was not met for K-8 and 9-12 (short ¼ cup).

It was documented that the spinach was “rotten throw out”. This was good to document on the production record why it wasn’t served, however, another vegetable should have been served in its place to meet the daily vegetable requirement. Remember to substitute within the same vegetable subgroup first to ensure the vegetable subgroup requirements are met for the week.

Wednesday, 10/24/18 (Lunch):

- Pepperoni Pizza: one portion size is provided to PreK-A. Therefore, the amounts in the Contribution and Serving Portion columns should be the same.
- Pepperoni Pizza: the CN label states the pizza provides 2 oz eq M/MA and 1/8 cup red/orange vegetables. These amounts



Program Year 2019

are not listed on the production record.

Friday, 10/26/18 (Lunch):

- The daily grain requirement was not met for grades 9-12 (short 1 oz eq).
- Chicken Nuggets: M/MA contribution must be rounded down to the nearest 0.25 oz. Therefore, 4 pieces provides 1.5 oz eq M/MA, not 1.6.
- Grade groups for carrot sticks and celery sticks is K-8 and A. Update the production record to include grades 9-12.
- Oranges are a fruit, not a red/orange vegetable. Update the contribution column.
- The SFS Supervisor stated chicken nuggets are no longer being served. Although the meal is no longer being served, the SFS Supervisor needs to determine whether or not the manager is following SFBS's production records as is or making changes to it.

For the week of 10/22-10/26/18, the weekly requirements were not met:

- For K-8, the minimum grains requirement was not met (short 0.25 oz eq).
- For 9-12, the minimum M/MA requirement was not met (short 1 oz eq).
- For 9-12, the minimum grains requirement was not met (short 1.25 oz eq).

Monday, 10/29/18 (Lunch, Cheese Pizza):

- The daily M/MA requirement was not met for Pre-K (short 0.5 oz eq).
- Purchased Cheese Pizza: the amount needed is in pounds. The SFS Supervisor stated the manager did not look at the pounds and took it as 37 pizzas. 37 pizzas were not enough for the number of meals that were served. Since the pizza is cut into 8 slices, 296 slices were available. However, the production record indicates that 299 meals (this includes the 1 sample tray) were served. There were 5 pieces that were leftover and discarded.

Wednesday, 10/31/18 (Lunch):

- Chicken Patty: 1 patty provides 1 oz eq grain, not 0.75. This was corrected during the onsite review.

Since the review of the rest of October for breakfast and lunch was not completed by the end of the onsite review, submit a copy of all recipes used from October 15-31, 2018.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Other Finding: School is not operating in accordance with site application.**

The school's site application indicates that there is OVS at breakfast for grades K-12. However, the SFBS supervisor advised that Pre-K is comingled with the older grades at breakfast.



Program Year 2019

**Corrective Action:**

1. Revise the site application in HCNP Systems to show that OVS is implemented for Pre-K.
2. Ensure that the correct information is entered on the annual renewal application in HCNP Systems. If changes are made to the school's meal service operations during the school year, ensure that the sponsor and/or site application(s) is updated accordingly.
3. NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9080: No signage explaining what constitutes a reimbursable meal under Offer vs. Serve.**

As observed on the Day of Review, signage explaining what constitutes a reimbursable meal under Offer vs. Serve (including the requirement that students must select at least ½ cup fruit or vegetable) is not identified near or at the beginning of the meal service line(s).

The manager created OVS signage however the first version did not contain the nondiscrimination statement. The manager created a second version which included the nondiscrimination statement. All signage issues were corrected onsite.

**Corrective Action:**

This issue was corrected onsite. No further corrective action required.

**Technical Assistance:**

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

General Program Compliance - Hana High and Elementary (402)

811. Justice for All poster displayed in prominent location?

**Finding 9000: Other Finding: Program materials do not include the correct nondiscrimination statement**

There is an Aina Pono poster posted on the service line which promotes breakfast to students – this is a nice idea. However, the poster does not have non-discrimination statement. Statement will need to be added.

The school website contains a link to the outdated Non-Discrimination Statement. Replace the link with the current link: <https://www.fns.usda.gov/fns-nondiscrimination-statement>

**Corrective Action:**

1. Make all of the appropriate corrections to the documents mentioned above. Ensure that the current nondiscrimination statement is included in all program materials.
  2. Submit the revised documents to demonstrate the changes listed above were corrected.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



### 812. Meal service observation – Program benefits available to all with no discrimination?

#### **Finding 9000: Special Diets**

One preschool student did not have milk with her meal at lunch. According to the preschool staff, the student must have thickened liquids and there is a nurse who is with the student and decides whether the student can/cannot eat something. The student has been at this school since 9/24/18. She has not had milk since this date because she needs thickened liquids. A medical statement was not provided. The IEP for the student was not provided but the SFS Supervisor explained that the IEP does not mention anything about meals. Since no documentation was provided, meals that were served to this student without all components of a reimbursable meal will be disallowed. The SFA provided a record of the number of meals served to this student from November 2018 to April 2019. Based on the documentation provided, a total of 60 meals will be disallowed.

According to the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs, p. 14-15: "Modifications Outside of the Meal Pattern: Certain physical or mental impairments require meal modifications that do not follow the required Program meal pattern. In a disability situation, meal modifications outside the meal pattern are reimbursable, provided the request is supported by a medical statement signed by a State licensed healthcare professional (see: Reimbursement for Modified Meals). When the medical statement is required (i.e., when the modification does not meet meal pattern requirements) the medical statement must include: • Information about the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, • An explanation of what must be done to accommodate the child's disability, and • The food or foods to be omitted and recommended alternatives, in the case of a modified meal. In other cases, more information may be required. For example, if the child requires caloric modifications or the substitution of a liquid nutritive formula to accommodate a disability, this information must be included in the statement.

If the child's IEP or 504 Plan includes the information required in the medical statement, or if the SFA obtains written medical verification of the impairment during the IEP/504 Plan process, it is not necessary for the SFA to also obtain a separate medical statement. Using a team approach may help ensure the IEP includes the information needed to fulfill FNS requirements for the medical statement. Clear communication about the requirements for the medical statement can help reduce the burden for families, school food service professionals, and other school officials working to accommodate children in the school setting. As a best practice, team members are encouraged to keep information about meal modifications in a secure and known location within the food preparation area, so that school food service staff can easily determine the type of modifications needed for each child on any given day. Note: The State agency may not require the written medical statement to provide a specific diagnosis by name or use the term "disabled" or "disability," though the State licensed healthcare professional may use these terms when submitting a medical statement. For further discussion of the written medical statement, please see page 6 of SP 59-2016."



Program Year 2019

**Corrective Action:**

1. Obtain a medical statement or IEP or 504 Plan for the student that includes all of the information required in a medical statement.
2. Submit a copy of the medical statement, IEP, or 504 Plan for the student.
3. Train all appropriate staff at the school on SFSB's process on accommodating meal modifications.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with all staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Other Finding: Onsite monitoring form does not include all of the required areas**

The SFA On-site Monitoring form that is being used by SFSB is dated 7/17/18 at the bottom of the form and consists of three pages. The form does not contain all of the review areas that are listed on the "School Food Authority On-site Review Checklist" from USDA (see SP 56-2016) or from HCNP's website: <http://hcnp.hawaii.gov/overview/nsfp/>.

**Corrective Action:**

1. Use HCNP's form or update SFSB's form to include at a minimum all questions that are listed on USDA's or HCNP's form.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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.**

Proper HACCP principles not observed: improper or insufficient personal hygiene - insufficient hand washing

One of the food service staff was observed drinking from an open cup, put gloves on, then drank from the same cup and placed the cup above the fruit/vegetable preparation area. The staff then stepped away to get containers of tomatoes and then touched the ovens with the gloves on.

**Corrective Action:**

1. Provide training to appropriate staff on the food safety plan and HACCP principles, including proper handwashing and use of gloves.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



***Program Year 2019***

1408. *Temperature logs available?*

**Finding 9000: Other Finding: No corrective action taken for out-of-range equipment temperatures**

Aug 30th, 2018 temperature log for Milk Cooler #2 reads 45 F (taken at 6:00 am). This is out of range. No corrective action was noted. Temperatures that are not within correct ranges should always be noted and addressed immediately.

**Corrective Action:**

1. Provide training to appropriate staff on the food safety plan, including recording equipment temperatures and corrective action procedures for out-of-range equipment temperatures.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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.

Various food items (pork link sausages, beef patties) were found in the reach-in refrigerators/freezers that were not labeled/dated. A McDonald's bag was also in the fridge. If food belongs to employee, it must be labeled w/name and date.

**Corrective Action:**

1. Provide training to appropriate staff on the school's food safety plan.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

1502. *Records retained for 3 years?*

**Finding 9000: Other Finding: Unable to demonstrate that requirements for recordkeeping are being met**

No evidence that documents have been maintained for 6 years plus the current, as required by DOE.

**Corrective Action:**

1. Provide training to appropriate staff on recordkeeping requirements. Since DOE requirements are more strict than USDA requirements, the DOE requirement must be followed.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.





SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

Program Year 2019

Kahaluu Elementary (306)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: February 7, 2019

Commendations

\* Food service

Kitchen was neat and organized.

Lunch (2/7) service line was efficient, allowing students to eat within designated lunch period.

School cuts their fresh fruit which makes it easier for the students to eat.

Food looked appealing and was tasty.

\* Fiscal

• Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

• Inventory was terrific! There was evidence that First-In, First-Out (FIFO) was being followed. The inventory items were labeled with the arrival date of the product. Inventory matched inventory cards.

• Deposit slips matched Manager's Summary Reports

• Daily meals counts for HCAP added up to the School Food Services Program Certificate meal counts

Technical Assistance

\* Offer vs Serve

Provided technical assistance to meal clerk on OVS for lunch. If student does not want the M/MA, the student can select 3 components (1 must be 1/2 c fruit/vegetable) and still have a reimbursable meal. School has 2 students who do not eat meat/pork.

\* Menu Documentation

Maintain Child Nutrition Labels, ingredient lists, and nutrition fact labels for menu items. Organize by each week of the cycle menu.

\* Production Records

Production records:

• Since there is no OVS for Pre-K, do not lessen the "Plan For" amount on the production record. For example, the production record for 10/1/18 lists 30 Pre-K students as the planned amount but the planned for amount for spinach, romaine, and baby carrots was listed as 3.

• The Actual Served amount for Pre-K and K-8 should recorded separately, not as one total since these grade groups are receiving different portion sizes.

• Oranges – 2 pieces were listed as the amount to offer. The manager understands that 4 pieces (1 orange) is equal to 1/2 cup of fruit. Explained to the manager that when the meal is pre-plated with orange being the 1/2 cup of fruit, the portion size must be 4 pieces, not 2 pieces.



SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

Program Year 2019

\* Recipes

Include the yields on school recipes.

Suggestions

\* Menu - Starchy Vegetables

Decrease the amount of starchy vegetables that are served in a week. For the week of October 1-5, 2018, more than 1-1/2 cups of starchy vegetables were served. The minimum weekly requirement is 1/2 cup per week.

\* Meal Charge Policy

Even though this school is a CEP school, recommend having a meal charge policy since the school sells a la carte items such as second entrée and milk.

\* Fiscal

• Per federal regulations, monies from School Food Service Branch (SFSB) account cannot pay any delinquent fee(s). I did not find evidence of delinquent fees but I found invoices that were paid late. If the cafeteria had incurred delinquent fees; the school's general funds would have to pay the fees. To avoid any delinquent fees, invoices should be paid in a timely manner. Invoice(s) stated payment is due "Net 30-day"

o Yhata invoice dated 7/3/8 and ATP was processed on 8/3/18 (did not give Vendor Payment enough time to process payment)

o Yhata invoice dated 2/1/18 and ATP was processed on 3/5/18.

• In SY 17-18, some 10-Bs were placed in a separate file instead of being attached to the ATP transactions and invoices. This made it difficult to verify 10-Bs were completed for all non-bid items purchases and a result, I could not verify all 10-Bs were completed (see corrective actions). But in SY18-19, 10-Bs were attached to the ATP and invoices. Please continue to follow the practice of storing 10-Bs with ATP and invoices.

Meal Components & Quantities - Kahaluu Elementary (306)

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

Finding 9000: Meal Components and Quantities - Milk Type

Pre-K is listed on the production records as having a choice of skim chocolate milk. Flavored milk is not an acceptable milk type for Pre-K students when they are not co-mingled with the other grades. Only unflavored fat-free or 1% milk may be served to preschool children. This was corrected during the onsite review.

Corrective Action:

This was corrected during the onsite review. No further action required.

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

Finding 9000: Meal Components and Quantities

The week of October 1-5, 2018 was selected for review. Since it was found that the meal pattern requirements were not met this week, the month of October was reviewed. The following issues were found, which include numerous issues with the production records:



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

Monday, 10/1/18 Lunch

- Chicken Strips: grain crediting is incorrect on the production record. 3 pieces = 1 oz eq grain, not 0.75 oz eq.

Tuesday, 10/2/18 Lunch

- Sloppy Joe: 80/20 ground beef was used instead of the 85/15 ground beef listed on the production record and recipe. Therefore, the Pre-K portion provided 1.25 oz eq M/MA instead of the 1.5 oz eq listed on the production record and recipe. This did not meet the daily M/MA requirement of 1.5 oz eq (short 0.25 oz eq). The K-8 portion provided 1.75 oz eq M/MA instead of the 2 oz eq listed on the production record and recipe.
- WG Cookie: counted as an extra item. This should be counted as a grain-based dessert for K-8. Grain-based desserts do not count as a grain for Pre-K.

Wednesday, 10/3/18 Lunch

- Chili: 80/20 ground beef was used instead of 85/15 ground beef listed on the production record and recipe. Therefore, the Pre-K-8 portion provided 0.25 oz eq M/MA instead of the 0.5 oz eq M/MA listed on the production record. Revise the production record template to include the correct Food Buying Guide factors for 80/20 ground beef so the appropriate amount of beef is served.
- Hummus: since two 2 oz portion cups are served per student, change the size of serving to 2 each or 4 oz instead of listing  $\frac{1}{4}$  cup.

Thursday, 10/4/18 Lunch

- Tuna salad: the recipe lists a #20 scoop and a #16 scoop to serve a portion size that provides 1.5 oz eq meat/meat alternate and 2 oz eq meat/meat alternate. These scoop sizes may not be large enough to serve the oz eq specified. Also, the amount needed for tuna on the production record was not enough for the oz eq listed.

Monday, 10/15/18 Lunch

- Chicken Patty: CN label says 1 patty = 1 oz eq grain, but production record lists  $\frac{3}{4}$  oz eq grain.
- Curly fries: production record lists Pre-K serving size is  $\frac{1}{2}$  cup but the crediting is  $\frac{1}{4}$  cup. The serving size should be  $\frac{1}{4}$  cup.

Tuesday, 10/16/18 Lunch

- Pasta Florentine: 80/20 ground beef was used instead of the 85/15 ground beef listed on the production record. Therefore, the Pre-K portion provided 1.25 oz eq M/MA instead of the 1.5 oz eq listed on the production record. This did not meet the daily M/MA requirement of 1.5 oz eq (short 0.25 oz eq). The K-8 portion provided 1.75 oz eq M/MA instead of the 2 oz eq listed on the production record. No recipe was provided.

Wednesday, 10/17/18 Lunch

- Popcorn chicken: Pre-K crediting is incorrect. 9 pieces = 1.5 oz eq meat, not 1 oz eq. Add the grain crediting to the production record. Pre-K should be 0.75 oz eq grain and K-8 should be 1 oz eq grain.

Thursday, 10/18/18 Lunch

- Pizza: size of serving is incorrect. Should be 5.13 oz instead of 2 oz. Add the grain and vegetable crediting – grain should be 2 oz eq and red/orange vegetable should be  $\frac{1}{8}$  cup.

Friday, 10/19/18 Lunch

- Kalua Pork and Cabbage: Production record lists 2 oz eq meat/meat alternate but the recipe provides 1.75 oz eq. For the cabbage, since the kalua pork and cabbage are cooked together, do not decrease the amount of cabbage needed – the production record indicates that the plan for number was decreased so that 80% of students receive cabbage.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

##### Monday, 10/22/18 Lunch

- Carrot sticks: the amount needed is not enough to provide 1/8 cup red/orange vegetable for Pre-K-8 because the incorrect per 100 factor was used. The per 100 factor used is for shredded carrots, not raw carrot sticks.
- Celery sticks: the amount needed is not enough to provide 1/8 cup vegetable for Pre-K-8 because the incorrect per 100 factor was used.
- Sliced Tomato: the per 100 factor on the production record is for cherry tomatoes. This will result in not having enough for the planned amount.

##### Tuesday, 10/23/18 Lunch

- Creole Macaroni: 80/20 ground beef was used instead of the 85/15 ground beef listed on the production record and recipe. Therefore, the Pre-K portion provided 1.25 oz eq M/MA instead of the 1.5 oz eq listed on the production record and recipe. This did not meet the daily M/MA requirement of 1.5 oz eq (short 0.25 oz eq). The K-8 portion provided 1.75 oz eq M/MA instead of the 2 oz eq listed on the production record and recipe. Production record lists 0.5 oz eq grain for Pre-K and 1 oz eq for K-8 but the recipe is 1.25 oz eq for Pre-K and 2 oz eq for K-8. Production record lists 1/8 cup tomato paste and 1/8 cup crushed tomato for Pre-K but the recipe provides 1/8 cup total red/orange vegetable. Production record lists 0.5 oz eq meat/meat alternate for Pre-K but recipe provides 0.25 oz eq meat/meat alternate.
- Romaine: the amount needed listed on the production record is not enough to provide five 1/8 cups for Pre-K and thirty-eight 1/4 cups for K-8.

##### Thursday, 10/25/18 Lunch

- Hot Mixed Vegetables: Servings Available, Leftovers, and Inventory Used columns were not completed. Only the Inventory Balance column was completed. Complete all columns of the production record for each menu item.
- Carrot (in hot mixed vegetable): Size of Serving lists 1/8 cup but the Contribution column lists 1/4 cup. This is not consistent.

##### Friday, 10/26/18 Lunch (Baked Chicken Pasta)

- The daily vegetable requirement was not met for K-8. A total of 1/2 cup of hot vegetables were served (short 1/4 cup). The monthly menu lists a house salad in addition to the hot vegetables but there is no documentation on the production record that salad was served.

For the week of 10/22-10/26/18, the weekly other vegetable subgroup requirement was not met (short 1/4 cup).

##### Monday, 10/29/18 Lunch (Fried Saimin and Egg Roll)

- The daily meat/meat alternate requirement was not met for Pre-K (short 0.75 oz eq).
- Grilled Chicken Strips: the CN label states 2.35 oz of product provides 2 oz eq meat/meat alternate. For Pre-K, the Size of Serving is listed as 0.5 oz. This amount credits as 0.25 oz eq meat/meat alternate. For K-8, the Size of Serving is listed as 1 oz. This amount credits as 0.75 oz eq meat/meat alternate.
- Egg Roll: since Pre-K was served half an egg roll, this provided 0.5 oz eq meat/meat alternate. Also, noted that the Egg Roll was offered, not served. This item should have been served, not offered.
- Cabbage: crediting is incorrect on the production record. The Size of Serving is 1/8 cup for PreK and K-8 but the Contribution is 1/4 cup.
- Sliced Tomato: the per 100 factor on the production record is for cherry tomatoes. This will result in not having enough for the planned amount.

##### Tuesday, 10/30/18 Lunch (Chicken Tenders)

- The minimum daily vegetable requirement was not met (short 1/8 cup) for K-8.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

- Chicken Tenders: the grain crediting is incorrect on the production record. 3 pieces provide 1 oz eq grain, not 0.75 oz eq.

Wednesday, 10/31/18 Lunch

- Sliced Tomato: the per 100 factor on the production record is for cherry tomatoes. This will result in not having enough for the planned amount.

Tuesday, 10/2/18 Breakfast

- Breaded Chicken Patty: 1 patty = 0.25 oz eq grain, not 0.5 oz eq. Also, each patty weighs 1.5 oz, not 1.63 oz.

Wednesday, 10/3/18 Breakfast

- Cinnamon Roll: The school's cinnamon roll recipe provides 3.5 oz eq grain per serving. This amount is 2 oz eq more than the amount listed on the production record for Grades K-8. Unable to determine the actual crediting amount for Pre-K with the recipe provided.

Thursday, 10/4/18 Breakfast

- Applesauce Muffin was served instead of Peach Bread. Remember to document all substitutions made on the production record. The Applesauce Muffin recipe provided during the on-site review provides 0.75 oz eq grain per serving for grades K-8. This does not meet the minimum daily grain requirement of 1 oz eq (short 0.25 oz eq). Since Pre-K is served half of the amount that K-8 is served, Pre-K did not meet the minimum daily grain requirement (short 0.25 oz eq).

Wednesday, 10/17/18 Breakfast

- Turkey Ham: the CN label provided states 2 oz of product provides 1 oz eq meat/meat alternate. Both the Size of Serving and the Contribution list 1 oz which is not correct. Based on the Amount Needed, each student received 1.69 oz of turkey ham which provides 0.75 oz eq meat/meat alternate, not 1 oz eq.
- Tortilla: the tortilla label provided shows the tortilla weighs 45 grams which is 1.5 oz eq grain, not 1 oz eq grain.

Thursday, 10/18/18 Breakfast

- Turkey Ham: the CN label provided states 2 oz of product provides 1 oz eq meat/meat alternate. Both the Size of Serving and the Contribution list 1 oz which is not correct. Based on the Amount Needed, each student received 1.69 oz of turkey ham which provides 0.75 oz eq meat/meat alternate, not 1 oz eq.
- Biscuit: recipe provides 1.25 oz eq grain per serving for grades K-8. The production currently lists 1 oz eq grain.

Tuesday, 10/23/18 Breakfast

- Tortilla: the tortilla label provided shows the tortilla weighs 45 grams which is 1.5 oz eq grain, not 1 oz eq grain.

Wednesday, 10/24/18 Breakfast

- Biscuit: recipe provides 1.25 oz eq grain per serving for grades K-8. The production record currently lists 1 oz eq grain.

Friday, 10/26/18 Breakfast

- Turkey Ham: the CN label provided states 2 oz of product provides 1 oz eq meat/meat alternate. Both the Size of Serving and the Contribution list 1 oz which is not correct. Based on the Amount Needed, each student received 1.69 oz of turkey ham which provides 0.75 oz eq meat/meat alternate, not 1 oz eq.
- Tortilla: the tortilla label provided shows the tortilla weighs 45 grams which is 1.5 oz eq grain, not 1 oz eq grain.

Wednesday, 10/31/18 Breakfast

- Crumb Cake: the recipe provides 2.25 oz eq per serving for grades K-8. Since half of the amount is served to Pre-K, each Pre-K serving is 1 oz eq.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

Day of Review Friday, 2/8/19 Breakfast

- Breaded Chicken Patty: 1 patty = 0.25 oz eq grain, not 0.5 oz eq. Also, each patty weighs 1.5 oz, not 1.63 oz.

Due to all of the issues noted above, additional training needs to be provided to the manager.

#### Corrective Action:

1. Revise the cycle menu by:

- Adding 0.25 oz eq M/MA for Pre-K to the Sloppy Joe lunch. The minimum daily M/MA requirement for Pre-K is 1.5 oz eq M/MA.

- Adding 0.25 oz eq M/MA for Pre-K to the Pasta Florentine lunch. The minimum daily M/MA requirement for Pre-K is 1.5 oz eq M/MA.

- Adding 0.25 oz eq M/MA for Pre-K to the Creole Macaroni lunch. The minimum daily M/MA requirement for Pre-K is 1.5 oz eq M/MA.

- Adding 1/4 cup vegetable for K-8 to the Baked Chicken Pasta lunch. The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.

- Adding 0.75 oz eq M/MA for Pre-K to the Fried Saimin and Egg Roll lunch. The minimum daily M/MA requirement for Pre-K is 1.5 oz eq M/MA.

- Adding 1/8 cup vegetable for K-8 to the Chicken Tenders lunch. The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.

- Adding 0.25 oz eq grain for K-8 to the Applesauce Muffin breakfast. The minimum daily grain requirement for K-8 is 1 oz eq grain.

- Adding 0.25 oz eq grain for Pre-K to the Applesauce Muffin breakfast. The minimum daily grain requirement for Pre-K is 0.5 oz eq.

2. Make all of the appropriate corrections to the production record templates and recipes. Production records must show how the offered meals contribute to the required food components and food quantities for each meal served to each grade group every day. Ensure the corrections meet the meal pattern requirements. Submit the revised documents to demonstrate the changes listed above were corrected.

3. Train the food service manager and all food service staff on how to complete the production record to ensure the documentation is completed correctly and ensure the meals meet the meal pattern requirements.

4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### General Program Compliance - Kahaluu Elementary (306)

811. Justice for All poster displayed in prominent location?



### Program Year 2019

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

Any document that mentions the USDA child nutrition programs must include the most current nondiscrimination statement. The nondiscrimination statement was not included on the following materials:

- OVS signage (dry erase poster)
- CEP outreach
- School website when referring to the lunch and breakfast programs

#### **Corrective Action:**

1. Use the most current nondiscrimination statement on all program materials. The current nondiscrimination statement is available at: <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>
  2. Provide a copy of program materials demonstrating the corrections were made.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

811. *Justice for All poster displayed in prominent location?*

#### **Finding 9000: Civil Rights Training**

The school does not have documentation that civil rights training was completed. All staff who are involved with the child nutrition programs must receive civil rights training annually.

#### **Corrective Action:**

1. Provide civil rights training to all staff involved with the child nutrition programs.
  2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

812. *Meal service observation – Program benefits available to all with no discrimination?*

#### **Finding 9000: Medical Statements**

School is using outdated Special Dietary Needs Medical Form (2014). Per new regulations, asking for a child's medical diagnosis is no longer allowable.

The school has medical statements for the following students:

- 'Student GM' has a medical statement that does not include suggested substitutions.
- 'Student IO' medical statement states almond/soy milk as suggested substitution to cow's milk; however, per conversation with manager, school does not carry/serve soy and/or almond milk. School has an email dated 10/21/16 from Lindsay stating they do not have soy milk at this time.



Program Year 2019

**Corrective Action:**

1. Immediately stop using the J-1 form from 2014. Use the revised form from the SFA that does not ask for Medical Diagnosis. Submit documentation to demonstrate the school is using the revised form and not the form from 2014.
2. Immediately provide the meal accommodation as specified on the medical statement. If clarification or information is needed, follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining clarification.
3. When a suggested substitutions are listed and the school does not carry any of those items, inform the family and discuss any other substitutions that the school is able to provide to accommodate the child. Maintain documentation of what was discussed and what was agreed upon for the meal accommodation.

Per the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs Guidance for School Food Service Professionals, page 15 states:

"When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals.

Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information."

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: SFA On-site Monitoring**

The review that was done in SY 18-19 indicated that corrective action should have been done (no trained meal clerk substitute) but the SFS Supervisor noted that corrective action was not needed.

The review that was done in SY 17-18 was incomplete:

- Date of the review was missing
- The meal counts were missing
- The date for each signature (SFS Supervisor and school staff) was missing

**Corrective Action:**

1. The SFA must train all staff who complete the onsite breakfast and lunch reviews to:
  - Correctly complete the onsite review form. This includes ensuring all questions and areas of the form are completed and for any findings noted, appropriate corrective action must be implemented.
  - Conduct a follow-up review within 45 days to ensure the school implemented the required corrective actions.
2. Provide a copy of the training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.





**Hawaii Department of Education**

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**SNP Administrative Review Findings**  
*Program Year 2019*

**DOE School Food Services Branch (1434-6)**



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Kailua High (309)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: February 28, 2019

#### Commendations

- \* Meal Counting & Claiming: AR Documentation

Documents were organized and ready for reviewers upon arrival on Thursday, 2/28.

- \* Meal Counting & Claiming: Efficiency of Lunch Service

Lunch service on 2/28 was efficient – students were able to quickly receive their reimbursable meal, food looked appetizing, staff was attentive.

- \* Meal Counting & Claiming: Kitchen and Meal Prep Areas

Kitchen/meal prep area was neat and orderly.

- \* Documentation

Documents were organized and ready for reviewers upon arrival on Thursday, 2/18.

- \* Lunch meal service

Lunch service on 2/28 was efficient -- students were able to quickly receive their reimbursable meal, food looked appetizing, staff was attentive.

- \* Meal Prep

Kitchen/meal prep area was neat and orderly.

- \* Fiscal: Documents

Thank you for having all requested documents ready and organized.

- \* Fiscal: ATP

Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

- \* Fiscal: Deposit slips

Deposit slips matched Summary Reports

- \* Fiscal: Inventory

Inventory matched inventory cards



**Program Year 2019**

**Technical Assistance**

- \* Meal Counting & Claiming: Offer vs. Serve

Explained to the SFS Supervisors the OVS requirements for high school students – at least three components must be selected, one component must be the ½ cup fruit/vegetable and the other two components must be the full component.

- \* Meal Counting & Claiming: Rounding on Production Records

A couple of calculations on the production records were below the correct values. TA was provided to round up to the nearest quarter cup/ounce/pound to ensure that enough of the ingredient is used in production.

- \* Offer vs. serve

Explained to the SFS Supervisor the OVS requirements for high school students -- at least three components must be selected, one component must be the 1/2 cup of fruit/vegetable and the other two components must be the full component.

- \* Rounding

A couple of calculations on the production records were below the correct values. TA was provided to round up to the nearest quarter cup/ounce/pound to ensure that enough of the ingredient is used in production.

- \* Fiscal: Documentation

Thank you for having all requested documents ready and organized

- \* Fiscal: ATP

Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

- \* Fiscal: Deposit slips

Deposit slips matched Summary Reports

- \* Fiscal: Inventory

Inventory matched the inventory cards.

- \* Fiscal

Provided Technical Assistance:

When paying for invoices, ensure that the correct object codes are being used. Payment VS037687 ATP 08172017 095244: Y. Hata invoice for USDA Foods. Object code 5501 Rental on Land & Building was used. This is incorrect. Should be 3602 Freight & Delivery Charges.

**Suggestions**

- \* Meal Counting & Claiming: Tabletop Surfaces

One tabletop in kitchen as well as shelves in dry storage and walk-in refrigerator have wood surfaces – this may help harbor bacteria and can be a food safety issue. Recommend replacing surfaces with stainless steel for improved sanitation.



Program Year 2019

\* Meal Counting & Claiming: Condiment

Suggest removing shoyu bottle from end of service line (observed during breakfast service on 3/1). Shoyu, including low-sodium version, is very high in sodium and significantly contributes to students' daily and weekly intake.

\* Meal Counting & Claiming: Meal Accounts

Provide training to cashiers/meal clerks so that they know if/when a student has reached their maximum meal charge amount (per provided policy, amount will differ between reduced and paid status students). Currently, clerks rely on POS system to disallow students from charging a meal if their negative balance is too great, but it would be helpful for clerks to be aware of amounts as well.

\* Meal Counting & Claiming: Insufficient Funds in Student's Meal Account

The USDA strongly discourages taking a child's meal away at the POS when it is determined their balance is too low. Instead, it is recommended the school serve a low-cost, alternative reimbursable meal. This is aimed to help prevent embarrassment on the student's behalf.

\* Wood surfaces in kitchen

One tabletop in the kitchen as well as shelves in the dry storage and walk-in refrigerator have wood surfaces - this may harbor bacteria and can be a food safety issue. Recommend replacing surfaces with stainless steel for improved station.

\* Shoyu offered during breakfast

Suggest removing shoyu bottle from end of service line (observed during breakfast service on 3/1). Shoyu, including low-sodium version, is very high in sodium and significantly contributes to students' daily and weekly intake.

\* Negative meal account

Provide training to cashiers/meal clerks so that they know if/when a student has reached their maximum meal charge amount (per provided policy, amount will differ between reduced and paid status students). Currently, clerks rely on POS system to disallow students from charging a meal if their negative balance is too great, but it would be helpful for clerks to be aware of amounts as well.

\* Confiscating meals

The USDA strongly discourages taking a child's meal away at the POS when it is determined that their balance is too low. Instead, it is recommended the school serve low-cost, alternative reimbursable meal. This is aimed to help prevent embarrassment on the student's behalf.

Meal Counting & Claiming - Kailua High (309)

317. DOR meal observation – overt identification, F/R eligible students treated differently?

**Finding 9062: Overt identification of students receiving F/R benefits.**

As observed on the Day of Review, the meal counting system as implemented does not prevent overt identification of students receiving free and reduced price benefits. During the onsite review, reviewers observed that one of the meal clerks during lunch informed students that they have a low balance as they passed the POS. This is an example of overt identification.



Program Year 2019

**Corrective Action:**

1. Provide training to meal clerks on overt identification. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

**Meal Components & Quantities - Kailua High (309)**

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

**Finding 9000: Onsite Review: Production Records**

The following issues were noted on the production records during the onsite review:

- 2/28 Lunch – Chicken & Broccoli: It was determined that the recipe for the Chicken & Broccoli did not contain enough chicken to provide 2 oz. eq. M/MA as credited on the production record. The alfredo sauce used in the Chicken & Broccoli should be credited towards the meat/meat alternate (M/MA) meal component. The 2 oz. of alfredo sauce in this recipe credits as 0.5 oz. eq. M/MA. These issues were corrected on site: the SFBSM made the appropriate revisions to the production record.

- 3/1 Breakfast – Breakfast Chicken Patty: The chicken patty contributes 1 oz. eq. M/MA and 0.25 oz. eq. G – corrected production record on site.

- 3/1 Lunch – Hummus, cup: 2 oz. of hummus contributes 1/8 cup vegetable (beans/peas). Carrot, Baby: 10 lbs. of baby carrots is not enough to provide 130 – 1/4 cup servings. 10.25 lbs. is needed – corrected production record on site.

**Corrective Action:**

This finding was corrected onsite. No further corrective action needed.

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

**Finding 9000: Review Period - Production Records**

Issues were noted on production records from the review period:

- (10/1 Lunch) Breaded Chicken Tenders or Pepperoni Pizza: Breaded chicken tenders contribute 2 M/MA and 1 oz. eq. G – corrected production record on site.

- (10/3 Lunch) Tuna & Cheese on WG Bun: American sliced cheese contributes 0.5 M/MA – corrected production record on site. Tuna credits ounce to ounce – 3 oz. of tuna credits as 3 M/MA – corrected production record on site.

- (10/4 Lunch) Breaded Chicken Nuggets w/ Rice: Chicken nuggets (5 pieces) contribute 2 M/MA and 1 oz. eq. G – corrected production record on site.

**Corrective Action:**

The above findings were corrected during the onsite review. No further corrective action required.

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



Program Year 2019

**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable.

Lunch on 10/2 was found to be short on the daily M/MA offering. Grades 9-12 require 2 oz. eq. M/MA daily and per production records, only 1.75 oz. eq. M/MA was offered via Chili, Cheese & Tots and Sloppy Joe. Error was found to be due to incorrect per 100 factor (used factor for 85/15 ground beef instead of 80/20 ground beef). Production records have been corrected to reflect the correct factor, however the entire month of October's (Review Period) lunch menu has been requested to be reviewed.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**Technical Assistance:**

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

**General Program Compliance - Kailua High (309)**

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Civil Rights Complaint Form**

The school's Civil Rights binder does not contain a complaint form.

**Corrective Action:**

This was corrected during the onsite review. No further corrective action needed.

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Nondiscrimination Statement**

The nondiscrimination statement is missing from the "Kailua High School Cafeteria/Meal Lunch Program" document on the school's website. The document also refers to SY 2011-2012 prices – school needs to update the document.



***Program Year 2019***

**Corrective Action:**

1. Submit documentation to demonstrate that the current nondiscrimination statement has been included in the "Kailua High School Cafeteria/Meal Lunch Program" document on the school's website. Ensure that the document shows the correct meal prices.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*812. Meal service observation – Program benefits available to all with no discrimination?*

**Finding 9000: Other Finding: Meal Modification**

The school provided a J-1 Form for one student, "JE", for the current school year. The SFSM stated that per verbal discussions with Lindsay (SFSB Dietitian), a modified cycle menu has not yet been created for this student. In the meantime, the dietitian instructed the SFSM to provide the student with a modified (pureed) diet, omitting pineapple, mozzarella/string cheese, and corn.

This information is inconsistent with the information prescribed on the J-1 form. The J-1 form shows that foods to omit include "rice, bread, noodles, most fruits. Milk. Chicken." Lunch for this student on the day of review (2/28/19) contained pureed chicken and pureed bread. Also, the SFSM stated that this student regularly takes two servings of milk despite being reminded that milk is not allowed in the diet. Further, the J-1 form states "Low carbohydrate diet guidelines per meal", with guidelines for carbohydrates, protein and fat. The SFSM was not aware of these dietary restrictions.

Prior J-1 forms for this student were also provided. The J-1 form for SY 2017-2018 was of extremely poor quality and unreadable.



### Program Year 2019

#### Corrective Action:

1. Immediately provide the meal accommodation as specified on the medical statement. If clarification is needed, follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining clarification.
2. The diet that is being provided must match the information that is documented on the current J-1 form. Document all written and verbal communication. Provide education (dietitian) to the SFSM on providing the appropriate modified diet for students with medical statements. Create a modified cycle menu to ensure that the meal being provided meets the orders prescribed on the J-1 form. If documents are unclear and/or illegible, obtain clarification and/or a legible copy.

Per the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs Guidance for School Food Service Professionals, page 15 states:

"When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals.

Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information."

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

#### 812. Meal service observation – Program benefits available to all with no discrimination?

##### Finding 9000: Other Finding: Outdated form for special diets

School is using the outdated J-1 Form (Special Diet) from 2014. Medical Statement forms can no longer require the medical diagnosis – the revised 2018 no longer asks for diagnosis. School should be using the updated form.





***Program Year 2019***

**Corrective Action:**

1. Immediately stop using the J-1 form from 2014. Use the revised form from the SFA that does not ask for Medical Diagnosis. Submit documentation to demonstrate the school is using the revised form and not the form from 2014.
2. Immediately provide the meal accommodation as specified on the medical statement. If clarification is needed, follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining clarification. Per the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs Guidance for School Food Service Professionals, page 15 states:

"When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals.

Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information."

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*1105. Foods sold to students during school day meet Smart Snacks standards?*

**Finding 9160: Foods and beverages sold to students not compliant with Smart Snacks standards.**

Some foods and beverages sold to students during the school day including a la carte foods and beverages sold during meal services and including food items sold during non-exempt fundraisers do not meet Smart Snacks standards.

Friday, March 1: Kona Ice on campus selling to students after school (within 30 min. of final bell.) Snacks sold may not meet Smart Snacks Standards and reviewers will request analysis of each product be sent to HCNP.

**Corrective Action:**

1. Provide training to school staff on Smart Snacks requirements.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.
3. Ensure that foods and beverages sold in school during the school day meet Smart Snacks requirements.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

*1408. Temperature logs available?*



#### Program Year 2019

##### **Finding 9000: Temperature Logs**

Temperature logs from August 2018 to February 2019 were reviewed. It was noted that temperatures for the walk-in freezer and 3-door freezer are consistently out of range. For example, in October 2018, temperatures for the walk-in freezer ranged between 4° to 12°. In February 2019, temperatures for the walk-in freezer ranged between 3° and 6°. For the 3-door freezer, temperatures ranged between 0° and 10° in February 2019. No corrective actions for out-of-range-temperatures are noted on the log.

Freezer temperatures should be between -10°F to 0°F, per the guidelines on the log. Corrective action should be documented and taken immediately.

##### **Corrective Action:**

1. Provide training to the appropriate staff on the food safety plan, including how to properly monitor and record temperatures for food service equipment.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

#### 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 observed by reviewers during the onsite review:

- A pan of dough balls in the 3-door freezer was not covered, labeled, or dated.
- A pan of ground beef was not covered, labeled, or dated in the walk-in refrigerator.

##### **Corrective Action:**

1. Provide training to appropriate staff on the food safety plan, including proper food storage.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Kalaniana'ole Elementary and Intermediate (365)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: March 5, 2019

#### Commendations

- \* Organized Documentation

Documents were organized and ready for reviewers upon arrival Tuesday morning.

- \* Local Wellness Policy

Local Wellness Policy is exemplary – extremely detailed and goal-oriented.

- \* Food Storage

Walk-ins (cooler and freezer) very well organized, with all products properly labeled and dated.

- \* On-Site Monitoring

On-site reviews were very thorough with appropriate corrective actions and follow up.

- \* Fiscal: Documentation

Thank you for having all requested documents ready and well organized

- \* Fiscal: ATP

Great job correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

- \* Fiscal: Deposit slips

Deposit slips matched the summary reports

- \* Fiscal: Inventory

Inventory sampled matched the inventory cards.

- \* FFVP dedication

The staff involved with FFVP has devoted much time and extra effort over the years in order to continue providing healthy FFVP snack to their students. Though commendable, the effort would be difficult to sustain without success team effort with viable group and administrative support.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Technical Assistance

- \* Storing utensils

Explained to staff that serving utensils (scoops) should not be stored in the container as this poses a potential cross-contamination risk. Utensils should be stored separately, outside of food containers. Staff was made aware and corrected this on site.

- \* Identifying reimbursable meals at the point of service

During lunch service on the day of review, the meal clerk rang up one student as having a reimbursable meal when the plate only consisted of a corndog and milk. This is a non-reimbursable meal under offer vs serve (OVS) because it does not include at least ½ cup of fruit or vegetable. After passing the POS, the student stated that the juice was given to a friend in line. TA was provided to the meal clerk that the student must have a fully reimbursable meal at the POS.

- \* Fiscal: DOE Form 10-B

Reminder: for items purchased that are not on the price list, a DOE Form 10-B Record of Small Purchase must be completed. If lowest quotation is not selected, justification needed.

#### Suggestions

- \* Offer Versus Serve

Consider implementing offer versus serve (OVS) for all grades except pre-K, where OVS is not allowed. This may help reduce costs and food waste.

- \* End of meal service

Consider allowing students to discard uneaten food as they finish eating so that students don't have to wait in line to discard their plates. It was observed that the students were touching the POS equipment (although the computer was locked by the meal clerk) and playing in line, which may result in spills.

#### Meal Components & Quantities - Kalaniana'ole Elementary and Intermediate (365)

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



Program Year 2019

**Finding 9000: Production Records**

The following issues were noted on production records from the review period:

Breakfast:

- Weds, 10/3: ½ cup of yogurt credits as 1 oz M/MA (not ½ cup). This was corrected onsite.
- Thurs, 10/4: 1 oz of turkey ham credits as 0.5 oz M/MA for grades K-8. For pre-K, ½ oz of turkey ham credits as 0.25 oz M/MA. This was corrected onsite.
- Friday, 10/5: the coffee cake recipe shows that enriched A/P flour is used, which is incorrect (whole wheat flour is used). The recipe was corrected onsite.

Lunch:

- Tues, 10/2: the production record shows that “85/115” ground beef is used, however the label that was provided is for 80/20 ground beef. This was corrected onsite.
- Tues, 10/2: the tortilla chips contain “trace of lime”. Need further documentation to show that this product meets whole grain-rich criteria.
- Weds, 10/3: 3 pcs of chicken tenders credits as 1 oz eq grain. This was corrected onsite.
- Thurs, 10/4: the beef patty credits as 2 oz M/MA. This was corrected onsite.
- Friday, 10/5: 2.4 lbs of turkey roast is not enough to provide for 25 – 1.5 oz servings for pre-K. This is because the wrong “per 100” factor is being used. The per 100 factor for pre-K is 14.4, and a total of 3.6 lbs of turkey roast is needed for pre-K. This was corrected onsite.

**Corrective Action:**

The SFA provided a product formulation statement (PFS) for the tortilla chips to demonstrate that this product meets whole grain-rich requirements. All other findings were corrected during the onsite review. No further corrective action needed.

General Program Compliance - Kalaniana'ole Elementary and Intermediate (365)

811. Justice for All poster displayed in prominent location?

**Finding 9000: Civil Rights Training**

No documentation of Civil Rights training for any employee. All staff who have duties involving federally-funded food programs are required to undergo annual Civil Rights training.

**Corrective Action:**

1. Provide civil rights training to all staff involved with the child nutrition programs.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Missing Nondiscrimination Statement**

Non-Discrimination statement is missing from Parent Handbook. Statement should always be included wherever and whenever federally-funded meal programs are mentioned.



Program Year 2019

**Corrective Action:**

1. Submit documentation demonstrating that the current nondiscrimination statement has been added to the school's Parent Handbook.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: J-1 Form**

School is using the old J-1 form (from 2014). Medical Diagnosis is no longer allowed to be requested - school should be using revised form as it does not ask for Medical Diagnosis.

**Corrective Action:**

1. The school must use the SFA's current J-1 form that does not require the written medical statement to provide a specific diagnosis by name.
2. Ensure all appropriate staff involved with the process of providing meal accommodations to students (including those who distribute the J-1 form) are using the SFA's current J-1 form. Provide the date that the current J-1 form is being implemented at the school.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Special Diets**

The school has one J-1 form for student "RA" for SY 18-19. A modified cycle menu was created for this student by the SFBS Dietitian, however it is for SY 17-18 (dated 10.03.17). Further, the menu states "Weeks 1-3 shown below...", however the menu is only one page/one week.

**Corrective Action:**

Document all training that is provided to the SFBSM in regards to special diets. Modified cycle menus should be complete and consistent with the current J-1 that is on file.

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. During the onsite review, reviewers observed that the reach-in refrigerator has unlabeled items (water bottles, juice boxes, etc.). All items should be labeled/dated, even if they belong to staff.



### *Program Year 2019*

#### **Corrective Action:**

1. Provide training to appropriate staff on food safety, include proper label and storage of food items.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Kauluwela Elementary (125)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: February 5, 2019

#### Commendations

##### \* Kauluwela Commendations

- Thank you for having all requested documents ready and organized for the NSLP team. Shirley from SFSB did an excellent job organizing the review materials.
- Great job on paying invoices quickly and 10Bs. All paper work matched up throughout the process perfectly.
- Fantastic adding the morning walking to your Wellness Program.
- Excellent school website right down to the pin worms. Thank you for having all requested documents ready and organized
- Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)
- Terrific job on the Payroll Certification
- Deposit slips matched Manager's Summary Reports
- School and cafeteria is very clean and well maintained. Students are very well behaved.
- The POS meal clerk is excellent and did a great job during our observations.
- Kudos for the school baker for fresh baked bread. The toast this morning was awesome!

#### Technical Assistance

##### \* Civil Rights

- Here are the Civil Rights requirements as outlined in FNS Instruction 113-1, Civil Rights Compliance and Enforcement- Nutrition Programs and Activities, dated November 8, 2005 for your reference.

##### \* Wellness Policy

- Here is the Federal Register link for the USDA Wellness Policy: <https://www.federalregister.gov/articles/2016/07/29/2016-17230/local-school-wellness-policy-implementation-under-the-healthy-hunger-free-kids-act-of-2010>

##### \* Breakfast Signage

Reminder: include 2nd breakfast choice on signage (cereal and toast).





Program Year 2019

Suggestions

\* Fiscal

- The payment stamp on many invoices were not completely filled out. Some were missing dates, some were not signed; however, many did not have the payment number. ATP 03022018 090124: None of the payment stamps on the invoices were filled out.
- Some of the Form 10-Bs were not signed or dated by the Administrator.
- It is best to keep the 10-Bs together with the invoice/ATP, not in a separate stack.
- Work with SFSB to get everyday use misc. items such as cleaning supplies added to a State wide Bid so School does not have to buy off bid at Y Hatta.
- One 10B was not completed for an emergency repair. Again, have SFSB do a State wide bid for repairs so schools do not have to complete a 10B.

\* Food Service

- Burned out lights in Storeroom. Could cause accident. Also makes it harder to read labels for FIFO. Please replace ASAP.
- Recommend using the 20 - 30 minutes plus break for batch cooking. Food can still be panned up for cooking, but then cooked during this time for a better product. For example, all French fries were cooked off before the serving time. The lunch that was eaten at the end of the first lunch period had French fries that were very hard, chewy and brittle. By the time the last child eats, it won't be a very good product for the children.

\* Professional Standards

- All employees except TA Manager are short in Professional Standards hours. While there is still plenty of time within the school year, please try to do training during the first part of year so correct procedures are used within the current school year. Eunyoung Baek and Roland Reverio have not yet been trained on any SOP's and recommend immediate training.

General Program Compliance - Kauluwela Elementary (125)

811. Justice for All poster displayed in prominent location?

**Finding 9000: Civil Rights**

The Civil Rights Manual was insufficient and technical assistance was provided.

**Corrective Action:**

Corrected onsite. No further action required.

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

**Finding 9000: Food Safety**

Food was not covered and dated in the refrigerator and freezer. All foods must be covered and dated when stored in the refrigerator and freezer.

- One observation was the Kalua Pork which was in the walk in fridge on 2/5/19 - the pork was stored uncovered for use on 2/6/19.
- Loaf bread was stored unwrapped. There are plastic covers available for minimal cost that are designed to be used on bun pan carts. Recommend using for bread storage to prevent cross contamination with dust or other pollutants.



***Program Year 2019***

**Corrective Action:**

1. Provide training to all food service staff to ensure staff are storing food properly. Train on all applicable standard operating procedures (SOPs) that pertain to the issues found during the onsite review.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Kaunakakai Elementary (407)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: January 24, 2019

#### Commendations

- \* Staff communication

POS cashier was continuously communicated with school staff to alert them when ready to send students to the serving line.

- \* Presentation of fruit

Apples were washed and cut. It is much easier for younger children to consume when pre-cut.

- \* Handling of produce delivery

Manager refused apple order as product was not acceptable; account was properly credited.

- \* Preventive maintenance of kitchen equipment

Evidence of preventative maintenance on equipment (e.g. walk-in coolers) -- helps prevent possible equipment breakdown.

- \* AR Fiscal Documentation

Thank you for gathering all of the requested fiscal documents.

#### Technical Assistance

- \* Insufficient quantities

Lunch on Thursday, January 24 was found to be 3/8 short on vegetables (vegetarian lasagna provided 3/8 cups vegetables total). Spoke with Jonathan prior to meal service and he added 3/4 cups salad (credits as 3/8 cup) to meet 3/4 cup daily vegetable requirement.

- \* Chocolate milk for Pre-K

Pre-K students were observed being served chocolate milk, which is unallowable for the age group. Because this is a new regulation, no fiscal action will be taken. Iris (SFSB Supervisor) provided TA to the POS cashier, informing her that chocolate milk is not allowed for Pre-K. HCNP concurs with TA provided.

- \* Outdated milk

Walk in refrigerator contained outdated milk – manager discarded immediately after being made aware.



# Hawaii Department of Education

## SNP Administrative Review Findings

## DOE School Food Services Branch (1434-6)

### Program Year 2019

\* Fiscal

Technical Assistance:

Ensure that ATPs are being completed correctly. There were many Form BV-1 Transmittal for Appropriate Action with ATPs sent back. Returned ATPs could lead to delayed payments to Vendors.

Meadow Gold milk is being categorized on ATPs as object code 3303 Food Provision. This should be using object code 3302 Milk.

Certain Y. Hata invoices are using object code 3303 Food Provision when it should be 3602 Freight & Delivery Charges since it is USDA Foods. (example: ATP 03092018 123922, Payment VS 251208 and ATP 03282018 093744, Payment VS 266509

\* Fiscal

Ensure that ATPs are completed correctly. There were many BV-1 Transmittal for Appropriate Action with ATPs sent back which could lead to late payments/fees, which cannot be paid with school food service funds.

When paying for invoices, ensure that the correct object codes are being used. Meadow Gold milk is being categorized on ATPs as object code 3303 Food Provision. This should be using object code 3302 Milk. Certain Y. Hata invoices are using object code 3303 Food Provision when it should be 3602 Freight & Delivery Charges since it is USDA Foods. (example: ATP 03092018 123922, Payment VS 251208 and ATP 03282018 093744, Payment VS 266509).

### Suggestions

\* Pre-cut lasagna

During lunch service on Friday 1/24, lasagna was not pre-cut prior to service. During service, line was held up multiple times as staff was cutting lasagna. Consider pre-cutting all lasagna to improve service line efficiency.

\* Unnecessary OVS Signage

Since school does not operate OVS, remove OVS signage that is posted at the beginning of the service line.

### Meal Components & Quantities - Kaunakakai Elementary (407)

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

#### Finding 9052: Day of Review portion sizes insufficient.

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review:

Lunch (Thursday, 1/24/19) was found to be 3/8 cup short on vegetables (vegetarian lasagna provided 3/8 cups total). Spoke with Jonathan prior to meal service and he added 3/4 cups salad (credits as 3/8 cup) to meet the 3/4 cup daily vegetable requirement.



***Program Year 2019***

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**Technical Assistance:**

The school was advised and given the opportunity to correct the insufficient quantity of 1 meal component(s) before the meal service started.

*406. DOR - meal service structured to meet specific meal pattern requirements for multiple menus, multiple age/ grade groups served?*

**Finding 9058: Age/grade group meal pattern requirements not being met for multiple menus and/or multiple age/grade groups served.**

As observed on the Day of Review, when the school is serving multiple menus and/or age/grade groups, it has not structured the meal service to meet the specific meal pattern requirements for each menu type and/or age/ grade group being served. Pre-K students were observed being served chocolate milk, which is unallowable for the age group. Because this is a new regulation, no fiscal action will be taken. Iris (SFSB Supervisor) provided TA to the POS cashier, informing her that chocolate milk is not allowed for Pre-K. HCNP concurs with TA provided.

**Corrective Action:**

HCNP concurs with TA provided. No further corrective action is required.

**Technical Assistance:**

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

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



Program Year 2019

**Finding 9081: Review of Productions records expanded to the entire Review Period.**

Based on a review of production records and other supporting food crediting documentation for the entire Review Period, some meals served during the Review Period did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Review Period meals missing required meal components:

Breakfast

- Wednesday, 10/3/18: did not include a grain. There was a meat/meat alternate component (yogurt in the smoothie), but USDA regulations require grain item always be served at breakfast, with the option for an additional meat/meat alternate item that may count towards weekly grain requirements. 94 breakfasts claimed on this day will be disallowed.

Lunch

- Monday, 10/1/18: did not meet daily vegetable requirement. Daily requirement is ¾ cup vegetables for grades K-8, but only 5/8 cups were served (1/4 cup cabbage, ¼ cup baked beans, 1/8 cup potato wedges).  
- Thursday, 10/4/18: did not meet daily vegetable or daily fruit requirements – ½ cup vegetables were served and no fruit was served. Daily fruit requirement is ½ cup. 272 lunches claimed on this day will be disallowed.

As a result of the Review Period (Week of October 1-5, 2018) findings, the entire month of October will be requested and reviewed (production records, recipes, CN labels, etc.). Fiscal action will be taken for relevant meals pending results of SFA-wide review.

**Corrective Action:**

1. Make all of the appropriate corrections to the menus and production record templates. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented. A review of the entire month of October will not be conducted, however fiscal action will be taken for non-reimbursable meals due to missing components that were identified during the onsite review.

**Technical Assistance:**

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

411. Review period planned menu – school comply, incomplete meals due to unacceptable substitutions? Enter data.

**Finding 9000: Other Finding: Production records are not completed correctly.**

Production Records are not being filled out correctly. Multiple instances of incorrect crediting – for example, October 3 lunch record credits shredded carrots as a MA and G. Thus, reviewers were unable to determine if vegetable requirement for that day were met. October 1 breakfast records indicate a #8 scoop was used to dish ¼ cup pineapple chunks (#8 scoop is used for ½ cup servings). Additional Production Record training will be requested.



**Program Year 2019**

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**General Program Compliance - Kaunakakai Elementary (407)**

811. *Justice for All poster displayed in prominent location?*

**Finding 9000: Civil Rights Training**

Civil Rights training is required on an annual basis – there is no evidence that school food service staff have received Civil Rights training. All relevant staff (Jonathan Espaniola, Donny Alfante, Linda Keliikoa, Elsa Ah Van, Ilana Meyer, Brittany Torres, Rory Ignacio-Torres) will need to receive Civil Rights training.

**Corrective Action:**

1. Provide civil rights training to all staff involved with the child nutrition programs.

2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

812. *Meal service observation – Program benefits available to all with no discrimination?*

**Finding 9000: Other Finding: Civil Rights Complaint Form**

The discrimination complaint form that was provided is inaccurate. The complaint form that was provided states that “all complaints...shall be accepted by the school and a copy forwarded to Department of Education, Civil Rights Compliance Office...” Child nutrition-related Civil Rights complaints are forwarded from the school to SFSB and then to HCNP. The complaint form should also explain the time lines for reporting claims:

- The complainant has 180 days to file the complaint from the date of the incident
- Complaints should be sent to HCNP from the school within 5 business days

**Corrective Action:**

1. Make all of the appropriate corrections to the Civil Rights Complaint form. Ensure the complaint form is available in the school's Civil Rights binder.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



**Program Year 2019**

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Special Diets**

The J-1 form that is being used is dated 5/23/14. Does SFSB have an updated J-1 form? The form that is currently being used asks for the child's medical diagnosis. New regulations related to special diets state that medical statement forms for special dietary needs must not request the child's medical diagnosis.

The "SFSB Office Use Only" sections are not completed (section with the dates received and reason for denial).

**Corrective Action:**

1. The school must use the SFA's current J-1 form that does not require the written medical statement to provide a specific diagnosis by name.
2. Ensure all appropriate staff involved with the process of providing meal accommodations to students (including those who distribute the J-1 form) are using the SFA's current J-1 form. Provide the date that the current J-1 form is being implemented at the school.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1404. Food safety plan - written, copy available?

**Finding 9000: Other Finding: Food Safety Plan is incomplete**

Only 4 of the 21 lessons have been taught - 17 SOP's have not been taught.

The Food Safety Checklist (on pages 70 - 73) has never been completed. It is HCNP's understanding that it is supposed to be completed weekly or at least monthly.

**Corrective Action:**

1. Continue to teach all lessons in Food Safety Manual until all are taught and start earlier in the school year in doing so. Start to self-evaluate and complete the Food Safety Checklist weekly.
2. Submit documentation to demonstrate that training was provided to appropriate staff. Submit copies of the completed Food Safety Checklist.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1407. SFA written food safety plan implemented?





### *Program Year 2019*

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

Proper HACCP principles not observed:

1. Temperature logs were reviewed for Walk-In #1 and Walk-In #2. All temperatures for both walk-ins were recorded as 38 degrees. On the day of review (1/24/19 at 11:15 am), the reviewer read the temperature on the walk-ins. Walk-in #1 read 37 degrees, and walk-in #2 read 42 degrees.
2. Cups of ice cream were being stored in the reach-in cooler. All items stored in food service areas should be labeled and dated.
3. Many items were not labeled and dated in the storage and cooling units.
4. There were 6 cans of pumpkin on the shelf near the door. There were no visible labels/dates and top of the cans were rusty, indicating that this product might be old.
5. Scooping utensils must not be stored in the food packaging (sugar, dry milk).
6. Reviewers noted a crate of chocolate milk was expired (1/21/19): the SFMS discarded these immediately.
7. In walk-in #2, raw meat (still wrapped individually in plastic) were defrosting in 2 pans and blood was pooling in the pans.

#### **Corrective Action:**

1. Provide training to appropriate staff on the food safety plan and HACCP principles.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFMS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



**SNP Administrative Review Findings**

**DOE School Food Services Branch (1434-6)**

**Program Year 2019**

**Keaukaha Elementary (372)**

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: March 8, 2019

**Commendations**

- \* Great ideas! FFVP in class with feedback sheets

The FFVP feedback sheets turned in by each classroom with every FFVP snack service helps create more involvement/participation and encourages the educational/experiential impact for the students.

The switching of FFVP distribution from dispensing to all students at recess to a classroom distribution has many benefits including less waste and allowing the teacher more flexibility to incorporate lesson with FFVP and receive feedback from the students.

- \* Documentation

-Documents were organized and ready for reviewers upon arrival Friday morning.

- \* Food Service

-Kitchen area was very clean and orderly, with evidence of good sanitation practices.

-Substitution made on Thursday, October 4 (review week) for vegetables was done appropriately – SFSM used romaine/green leaf lettuce to replace broccoli (all are in ‘dark green’ subgroup) and cabbage to replace celery (both in ‘other’ subgroup). This substitution allowed the weekly vegetable subgroup requirement to remain unchanged.

- \* Local Wellness Policy

- Good job on being named a Blue Zones Project School! The school’s Local Wellness Policy is detailed, goal-oriented, and reflects the school’s commitment to promoting healthful lifestyle behaviors to students and the school community.

- \* Fiscal

· Thank you for having requested documents ready and organized

· Deposit slips matched Summary Reports

· Inventory sampled matched the inventory cards

**Technical Assistance**

- \* Edit Check

Edit Check Comments – remember to document an explanation for each \* on the Edit Check for each eligibility status.



# Hawaii Department of Education

## SNP Administrative Review Findings

## DOE School Food Services Branch (1434-6)

### Program Year 2019

#### \* Fiscal

- When paying for invoices, ensure that the correct object codes are being used. From the sample selection, there were multiple ATPs that had incorrect object codes:
- Examples: payment VS252894, VS244195, VS151718, VT094482 Y. Hata. This was for USDA food. ATP object code 3303 Food Provision was used. USDA Foods should use object code 3602 Freight & Delivery Charges.
- Payment VS242764, VS151784: Hawaii Paper Products (napkin, paper tray, apron) used incorrect object code 3303 Food Provision.
- Payment VS139262, VS128906: Office Max (forks, gloves) used incorrect object code 3004 Clothing Supplies.
- Reminder: for items purchased that are not on a price list, a DOE Form 10-B Record of Small Purchase must be completed. If lowest quotation is not selected, justification needed.

### Suggestions

#### \* Providing FFVP to teachers of the classrooms

In the review year, the school used all its budget to only served FFVP to students, teachers do not get FFVP snacks along with the students:

If future FFVP budget allows, teachers should also be served FFVP when possible in order for them to better relate to the children's experiencing the fruit/vegetable snack and for them to enhance the educational aspects of the offering.

#### \* Professional Standards

-Professional Standards: The minimum training time that can be logged is 15 minutes. Training logs indicated some training times of 5 minutes – tracker should combine smaller trainings to reach minimum threshold of 15 minutes.

### Meal Components & Quantities - Keaukaha Elementary (372)

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

#### **Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served.

The daily vegetable requirement was not met on Wednesday, 10/3 -- menu provided 5/8 cups vegetable, while the requirement is 3/4 cups.

#### **Corrective Action:**

1. Make all of the appropriate corrections to the menu, production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### General Program Compliance - Keaukaha Elementary (372)



Program Year 2019

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Program materials missing the nondiscrimination statement**

The following materials do not have the Non-Discrimination Statement:

- CEP Outreach/School meal program information in Handbook
- OVS signage in cafeteria (daily menu sheets)
- Breakfast outreach in December 2018, January, February, and March 2019 Newsletters
- School meals section of the Ohana Handbook

Statement must be on ALL documents pertaining to the school meal programs.

**Corrective Action:**

1. Make all of the appropriate corrections to the appropriate documents. Ensure that all program materials include the current nondiscrimination statement.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Special Diets**

School is using an old J-1 form (from 2014). Medical Diagnosis is no longer allowed to be requested -- school should be using revised form as it does not ask for Medical Diagnosis.

Remember to date stamp when J-1 forms are received. Most of the J-1 forms on file are date stamped with the date received, however the form for student KB was not.

Special diets must be processed in a timely manner. A J-1 form for student NN was received on 1/10/19, however the modified cycle menu for this student was not given to the school until 3/6/19 (per email from Lindsay).

**Corrective Action:**

1. The school must use the SFA's current J-1 form that does not require the written medical statement to provide a specific diagnosis by name.
2. Ensure all appropriate staff involved with the process of providing meal accommodations to students (including those who distribute the J-1 form) are using the SFA's current J-1 form. Provide the date that the current J-1 form is being implemented at the school.
3. Provide training to appropriate staff involved in receiving J-1 forms. Ensure that training includes date stamping J-1 forms upon receipt, and timelines for providing meal accommodations. Per USDA guidance, meal accommodations must be provided immediately as specified on the medical statement. If clarification is needed, follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining clarification.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



**Hawaii Department of Education**

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**SNP Administrative Review Findings**  
*Program Year 2019*

**DOE School Food Services Branch (1434-6)**



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Kekaha Elementary (458)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: February 20, 2019

#### Commendations

- \* AR Documentation

NSLP documents/materials were well organized and ready for reviewers upon arrival.

- \* Food safety and storage

Kitchen, including dry storage, walk-ins, reach-ins, etc. was clean & organized. Food items labeled and stored properly.

- \* Meal service tables

Reviewers liked movable serving tables to easily transition to OVS starting with grade 3 students.

- \* Staff trained in OVS requirements

POS employee (Maria) knew OVS procedure for lunch on Tuesday – able to correctly answer reviewers' questions regarding reimbursable meals

- \* Other Federal Programs: Caring for the students and community

Commendation to the Kekaha Principal and Food Service Manager who showed a lot of pride when we observed their school's students enjoying FFVP out on the playground and the other efforts the school does (e.g. food pantry family boxes of donated foods) to provide nourishing foods to the students and families.

- \* Fiscal

-Thank you for having all requested documents ready and organized

-Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

-Deposit slips matched Manager's Summary Reports

-Inventory was terrific! There was evidence that First-In, First-Out (FIFO) was being followed. The inventory items were labeled with the arrival date of the product. Inventory matched inventory cards.

#### Technical Assistance

- \* Whole grain resource, PFS, CN labels

Explained 'Exhibit A' handout, which is used to determine how whole grain-rich products should be credited. Also explained that product formulation statement (using chow mein noodles), like a CN label, is used to determine proper meal component crediting.



# Hawaii Department of Education

## SNP Administrative Review Findings

## DOE School Food Services Branch (1434-6)

### Program Year 2019

#### \* Fiscal

-Noticed that there were no August 2017 Approval to Pay (ATP) reports. All of the August 2017 (and some July 2017) invoices were paid in September 2017. It is important to pay all invoices promptly, as delayed payments could lead to delinquent fees/late charges. These late charges cannot be paid from the nonprofit school food service account. Instead it must be paid with the school's general funds.

-Found a DOE Form 10-B Record of Small Purchase that was not signed by the Administrator. Please ensure that all 10-Bs are completed correctly.

-Vended meals: the production records should list in the actual served column the amount of meals served to students and amount of meals served to adults. This total monthly amount would then equal the school food service certificate.

### Suggestions

#### \* Milk distribution during meal service

During lunch on Tuesday, reviewers noticed serving line would often get held up with milk at the end of the line. Consider an alternative method of milk distribution that may help increase the efficiency of the line.

#### \* Meal charge policy

Although school is CEP, consider developing a Meal Charge Policy as school does allow a la carte milk sales. This can help if/when a student wants to charge a milk but does not have money in their account.

### Meal Counting & Claiming - Kekaha Elementary (458)

325. Review Period meal counts by category correctly used in the claim? Enter data.

#### **Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.**

The sum of the school's daily meal counts by category for the review period does not match the State agency's validated meal counts for the school for the review period. The school underclaimed one breakfast on October 30, 2018. Manual counting was used on that day and meals were not counted correctly. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

#### **Corrective Action:**

1. Review and develop a written procedure for manual meal counting for days when the POS is not available. Submit a copy of the written procedure.
2. Provide training to appropriate staff on manual meal counting for days when the POS is not available.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

### Meal Components & Quantities - Kekaha Elementary (458)

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



Program Year 2019

**Finding 9000: Other Finding: Production Records (Day of Review)**

(2/19/19): The lunch production record incorrectly lists serving size of chicken strips as '3.30 oz.'. However, three pieces actually weights 4.5 oz. Additionally, grain contribution from the chicken strips was not noted (lunch provided 2 oz. eq grains for grades K-8 -- 1 oz. eq. from rice, 1 oz. eq. from chicken strips).

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Other Finding: Production Records (Review Period)**

Issues were noted on production records for the review period:

LUNCH

Monday, 10/1: production record includes incorrect crediting for fish. May be outdated info?

Wednesday, 10/3: production record credits cabbage as half volume served – cabbage credits as the amount served.

BREAKFAST

Thursday, 10/4: production record does not indicate difference in size of coffee cake for pre-k vs. K-5. Per standardized recipe, 1 slice provides 1.5 oz. eq. grain (1/2 slice therefore provides 0.75 oz. eq. grains. Crediting of coffee cake on production record is incorrect.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**General Program Compliance - Kekaha Elementary (458)**

811. Justice for All poster displayed in prominent location?





### Program Year 2019

#### **Finding 9000: Other Finding: Missing or incorrect nondiscrimination statement on program materials**

The incorrect nondiscrimination statement was used on the February 2019 breakfast menu (on the school website).

One OVS poster (nearest to the POS) does not have the nondiscrimination statement. This was corrected onsite. No further action is needed.

The SY 18-19 Handbook does not include the nondiscrimination statement. The statement should be included when NSLP program is referenced.

#### **Corrective Action:**

1. Make all of the appropriate corrections to NSLP program materials. Ensure that the correct nondiscrimination statement is being used.

2. Submit the revised documents to demonstrate that the correct changes have been made.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### 812. Meal service observation – Program benefits available to all with no discrimination?

#### **Finding 9000: Other Finding: Missing Civil Rights complaint form**

The school did not have the correct Civil Rights complaint form on file. This was corrected onsite and no further corrective action is needed.

#### **Corrective Action:**

Corrected onsite. No further corrective action needed.

### 1408. Temperature logs available?

#### **Finding 9000: Other Finding: Use of White-Out on Temperature Logs**

Temperature logs (foods received) had evidence of the use of white-out. Logs, like production records, should not be whited-out; rather, a line should be drawn through erroneous information (so original writing is still legible) and new information added w/initials and date.

#### **Corrective Action:**

1. Acknowledge understanding of the prohibited use of white-out on documentation. Communicate this requirement to food service staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Keonepoko Elementary (391)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: April 9, 2019

#### Commendations

\* Kitchen, Documentation, Meal

Kitchen, including walk-ins and reach-ins were neat & orderly.  
Documentation was organized.  
Lunch was tasty and appealing.

\* Fiscal

- Thank you for having all of the requested documents ready and organized
- Deposit slips sampled matched the Summary Reports
- Inventory sampled matched the inventory cards

#### Technical Assistance

\* Meal Accommodations

If the meal pattern requirements cannot be met when accommodating a special diet, a signed medical statement (J-1) must accompany the special cycle menu. If a student has a signed J-1 form, the special diet must be implemented immediately to the maximum extent possible. If needed, the manager should contact SFSB immediately to request training on implementing the special diet.

\* Onsite Reviews

The MC-7 onsite reviews that were completed were very thorough and provided appropriate corrective actions/follow up. Remember to complete a separate form for each meal service rather than completing one form for both breakfast and lunch, even if the responses are color coded. This makes it easier to understand the form.

\* Recipes

Update the recipes to list the current flour being used instead the AP flour.

\* Fiscal

Reminder: for items purchased that are not on a price list, a DOE Form 10-B Record of Small Purchase must be fully completed. If lowest quotation is not selected, justification needed.

- o Form 10-B on 8/15/18 was not signed by Manager, Form 10-B on 8/26/18 was not signed by Administrator (Sept 2018 ATPs)

Some of the daily eTriton Manager's Summary reports (RPT415) were signed and some were not signed. It is best practice if these daily printout reports are verified and signed daily.



Suggestions

- \* Signage - Monthly Menu

Post the monthly menu on the sneeze guard at the beginning of the serving line.

Other Federal Programs - Keonepoko Elementary (391)

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

**Finding 9000: Afterschool Snack Program**

Reviewers were not able to validate that the planned portion sizes met the meal pattern requirements for the review period because product labels were not provided for:  
10/1/18 String Cheese; 10/3/18 Cheese Cracker.

Also, the following issues were found with the production records:

Thursday, 10/4/18

- The marshmallow square provides 1 oz eq of grain and is 40 grams (1.4 oz) but the production record lists 0.75 oz for the serving size.

Tuesday, 10/16/18

- Banana muffin: serving size is listed as 1 oz. The muffin is 2 oz but is a 1 oz eq.

Wednesday, 10/17/18

- Fruit punch: serving size is listed as 8 oz. Food component is incorrectly listed as "M".

Thursday, 10/2/18

- Marshmallow square is listed as 2 oz for serving size. The marshmallow square is 40 grams (1.4 oz).

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates. Production records must show how the offered meals contribute to the required food components and food quantities for each meal served to each grade group every day. Ensure the corrections meet the meal pattern requirements. Submit the revised documents to demonstrate the changes listed above were corrected.

2. Train the food service manager on how to complete the production record and how to ensure the meals meet the meal pattern requirements.

3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

Meal Components & Quantities - Keonepoko Elementary (391)

401. DOR - meals selected by students contain all required components/quantities? Enter data.



### Program Year 2019

#### **Finding 9000: Meal Components and Quantities - Day of Review**

During lunch service, a preschool student did not have milk, but the meal clerk counted it as a reimbursable meal. The meal clerk explained that the student is allergic to milk. However, the school does not have a medical statement for this student. Since there is no medical statement, the preschooler must have all components in order to count the meal as reimbursable. The School Food Services Supervisor showed the meal clerk how to cancel the reimbursable meal and enter it as a nonreimbursable meal.

#### **Corrective Action:**

1. Provide meal counting training and meal pattern training to all meal counting staff so staff understand what makes up a reimbursable meal.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

#### **Finding 9000: Meal Components and Quantities - Review Period**

The week of October 1-5, 2018 was selected for review. It was found that the meal pattern requirements were not met this week for lunch (short 1/8 cup of vegetables for grades K-6 on October 3, 2018). Therefore, the rest of October was reviewed. The following are issues that were found:

Monday, 10/1/18 Lunch

- Provide label for Pom Swirl.

- The "Plan For" and "Amount Needed" amounts on the production record look incorrect. For romaine lettuce:

PreK-A: Plan For amount is 40

Amount Needed is 1.29#

In the row right above this, the Plan For amount is 200 and Amount Needed is 6.39# but it does not list the grades or serving size.

The same issue was found with the makina cabbage.

Tuesday, 10/2/18 Lunch

- Chili recipe: both the typed recipe and the handwritten amounts do not provide the contribution listed at the bottom of the recipe. The handwritten amount for 637 servings provides 1.25 oz eq M/MA (not 1.5 oz), 1/8 cup red/orange vegetable (not 1/4 cup), 1/8 cup beans (not 1/4 cup), and 1/8 cup other vegetable.

- Ground beef: since 80/20 ground beef was used, the Per 100 Factor is incorrect on the production record. For a 1.5 oz serving, the factor is 12.7, not 12.6. For a 2 oz serving, the factor is 17, not 16.8. Therefore, each serving for Pre-K-6 was 1.25 oz eq M/MA, not 1.5 oz eq.

- Nacho chips: 6 chips = 0.5 oz eq grain, not 1 grain for Pre-K.

Wednesday, 10/3/18 Lunch (Chicken Tenders)

- Did not meet the daily vegetable requirement for K-6 (short 1/8 cup). Corrected during onsite review – changed crinkle carrots from 1/8 cup to 1/4 cup.

- Crediting information for the grain on the chicken tenders is not correct. 3 pieces provides 1 oz eq grain, not 0.75 oz eq.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

Corrected during onsite review.

Thursday, 10/4/18 Lunch

- The "Plan For" and "Amount Needed" amounts on the production record look incorrect. For broccoli florets:

K-A: Plan For amount is 173

Amount Needed is 3.02#

In the row right above this, the Plan For amount is 207 and Amount Needed is 5.85# but it does not list the grades or serving size.

Breakfast Menu: alternate breakfast is not listed. Corrected onsite – May breakfast menu has alternate breakfast listed.

Wednesday, 10/3/18 Breakfast

- Yogurt: 4 oz of yogurt = 1 oz eq M/MA. "MA" is listed under the Contribution column. Corrected during onsite review.

Thursday, 10/4/18 Breakfast

- Coffee Cake recipe: clarify if the amounts listed for the streusel is for 300 servings or 450 servings. Coffee cake recipe was provided with 370 servings.

- Form used to calculate grains in a recipe is not rounding correctly. Example: 1.134 does not round down to 1.25; it rounds down to 1. Another grains calculation form was provided. However, only 18# of flour was entered. The recipe also contains 2.5# of oats and 3.5# of flour in the streusel which need to be included as well. A serving provides 1.75 oz eq grain, not 1.25 oz eq. Update the crediting on the production record.

- Pork link: submit CN label/Product formulation statement. Received label on 4/9/19. 2 links = 1 oz eq M/MA.

Monday, 10/15/18 Lunch

- Breaded Chicken Strips: 3 pieces provides 1 oz eq grain, not 0.75. Corrected during onsite review.

Tuesday, 10/16/18 Lunch

- Was the WG Cookie served? If so, provide the recipe. Cookie provides 1 oz eq grain. Document on the production record (remove "NC" under contribution).

Wednesday, 10/17/18 Lunch

- Ground beef: clarify if 80/20 or 85/15 ground beef was used.

- Creole Macaroni recipe: if the handwritten amounts were followed, what is the yield?

- What was the serving size of the creole macaroni for Pre-K and K-6?

- Provide recipe for the French roll.

Monday, 10/22/18 Lunch

- Provide label for Pom Swirl

Tuesday, 10/23/18 Lunch

- Fried Noodles: provide a copy of the label for the noodles that were used. Yang's chow mein label was provided.

Cornstarch for dusting is listed in the ingredient list. If cornstarch is less than 2% of the product formula, provide the product formulation statement to demonstrate the product meets the USDA whole grain-rich criteria.

- Grilled Chicken Strips: the CN label states 2.35 oz of chicken provides 2 oz eq M/MA. The production record lists the contribution and the serving size as 0.5 oz for Pre-K and 1 oz for K-6. The contribution cannot be the same as the serving size. Clarify what was served.

- Chop Suey Mix: specify what kind of vegetables are in this mix.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

- Egg roll: 1 piece provides 1 oz eq M/MA, 1 oz eq grain, ¼ cup other vegetables. The production record does not list the grain crediting information.
- Fried Saimin: provide the recipe.

#### Wednesday, 10/24/18 Lunch (Chicken Tenders)

- Did not meet the minimum daily vegetable requirement for K-6 (short 1/8 cup). Corrected during onsite review – changed crinkle carrots from 1/8 cup to ¼ cup.
- Chicken Tenders: 3 pieces provides 1 oz eq grain, not 0.75. Corrected during onsite review.
- WG Roll: nothing was documented in the columns on the right to indicate that the roll was served. This is not being counted toward the meal pattern requirements.

#### Thursday, 10/25/18 Lunch

- Apples are listed as “RO” under the contribution column. If this means red/orange vegetable, this is incorrect. Apples are a fruit. Corrected during onsite review.

#### Friday, 10/26/18 Lunch

- Purchased Pepperoni Pizza: 1/8 of the pizza provides 2 oz eq M/MA and 1/8 cup red/orange vegetables which were not documented on the production record. Corrected during the onsite review.

#### Monday, 10/29/18 Lunch

- Chicken Patty: 1 patty provides 1 oz eq grain, not 0.75. Corrected during onsite review.

#### Wednesday, 10/31/18 Lunch

- Popcorn Chicken: 12 pieces provides 1 oz eq grain. This was not listed on the production record. The M/MA crediting was incorrect on the production record for Pre-K. 9 pieces provides 1.5 oz eq M/MA, not 1 oz. 9 pieces provides 0.75 oz eq grain. The grain crediting was not listed on the production record. Corrected during onsite review.

#### Corrective Action:

1. Make all of the appropriate corrections to the production records, recipes, and grains calculation form. Submit the revised production records and recipes to demonstrate the changes listed above were corrected.
2. Maintain legible product labels, ingredient lists, and nutrition facts labels for all products served. This includes any Child Nutrition Labels and Product Formulation Statements.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### General Program Compliance - Keonepoko Elementary (391)

812. Meal service observation – Program benefits available to all with no discrimination?



### Program Year 2019

#### **Finding 9000: Medical Statements**

School is using the old J-1 form (from 2014). Medical Diagnosis is no longer allowed to be requested - school should be using revised form as it does not ask for Medical Diagnosis.

The school has a medical statement (J-1) on file for student AR, signed on 11/20/18. This student requires a moist minced diet texture. Foods to omit include eggs, dairy, corn, cabbage, broccoli, cauliflower, onion, and garlic. The manager stated that this special diet has not yet been implemented because a special cycle menu has not yet been provided. Special diet requests accompanied by a J-1 form must be implemented immediately. The SFSB Supervisor is following up with the SFSB Registered Dietitian on the status of this special diet.

#### **Corrective Action:**

1. Immediately stop using the J-1 form from 2014. Use the revised form from the SFA that does not ask for Medical Diagnosis. Submit documentation to demonstrate the school is using the revised form and not the form from 2014.
2. Immediately provide the meal accommodation as specified on the medical statement. If clarification is needed, follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining clarification. Per the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs Guidance for School Food Service Professionals, page 15 states:

"When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals.

Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information."

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

902. *On-site monitoring review – CA required, follow up conducted?*

#### **Finding 9000: Onsite Monitoring**

An on-site follow-up review was not conducted within 45 days to ensure that corrective action was implemented.

Three onsite reviews were completed by the SFA for this site: 10/19/18 (breakfast and lunch), 11/9/18 (breakfast and lunch), and 1/30/19 (breakfast and lunch).

The third review was not completed within 45 days of the second review.

It was also noted that for the first and third onsite reviews, both breakfast and lunch were documented on the same review form.



## Hawaii Department of Education

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### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### *Program Year 2019*

##### **Corrective Action:**

1. The SFA must train all staff who complete the onsite breakfast and lunch reviews to:

- Correctly complete the onsite review form. This includes completing a separate form for each meal service so it is clear what findings and corrective actions are needed for each meal service.
- Conduct a follow-up review within 45 days to ensure the school implemented the required corrective actions.

2. Provide a copy of the training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

##### **Technical Assistance:**

The MC-7 onsite reviews that were completed were very thorough and provided appropriate corrective actions/follow up.

Remember to complete a separate form for each meal service rather than completing one form for both breakfast and lunch, even if the responses are color coded. This makes it easier to understand the form.





## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Kohala Middle (366)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: January 11, 2019

#### Commendations

- \* Water Availability

Water availability (cooler with cups) at breakfast and lunch service.

- \* Local foods and F2S menu

Hawaii foods were served as part of F2S menu on Jan. 10 – Laulau, Lomi, Pineapple, Rice. Excellent and tasted very much.

- \* Food temperature

Lunch entrée (laulau) and rice on 1/10 arrived at proper temperature (>135 F).

- \* Utilization of leftovers

School was utilizing leftover fruit (example a pot of apples were found in the walk in. It will later to be made into apple bread thus saving food cost.

#### Technical Assistance

- \* Civil Rights Documents

School did not have Civil Rights Procedure, Complaint Log, or Complaint Form on location. HCNP explained to Principal Brown the USDA's requirement of having these documents on-site should an NSLP-related Civil Rights complaint arise.

- \* Fiscal

Provided Technical Assistance:

Hilo Rice Company sends a bill for delivery of their products through Hilo Products and Trucking Co. For example: 3/1/18 \$45.51, 3/5/18 \$17.10, 3/8/18 \$29.91, 3/22/18 \$17.10. Products from any vendor should be FOB.

#### Suggestions

- \* USDA Professional Standards Training Tracker Tool

Consider using the USDA's Training Tracker Tool (web-based) to log all staff training hours – this will help ensure annual training requirements are met. One training log submitted had training dates in August 2018, but it was logged on a SY 17-18 sheet – these dates indicate SY 18-19. Using the tool will also help to ensure all necessary information (dates, times, staff, etc.) is logged; Food Safety training on 1/9/19 did not include number of hours, thus those training hours cannot be verified.



SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

Program Year 2019

- \* Logging food temperatures

Consider logging temperature of food upon receipt at the Middle School. Because it is a satellite school, Kohala Middle is more susceptible to receiving out-of-temperature foods, thus increasing risk of potential foodborne illness.

Meal Counting & Claiming - Kohala Middle (366)

325. Review Period meal counts by category correctly used in the claim? Enter data.

**Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.**

The sum of the school's daily meal counts by category for the review period does not match the State agency's validated meal counts for the school for the review period. For the review period, the State Agency validated 769 free lunches and 496 free breakfasts, and 531 paid lunches and 213 paid breakfasts. The school's edit check worksheet and claim were for 771 free lunches and 497 free breakfasts, and 529 paid lunches and 212 paid breakfasts (overclaim of 2 free lunches and 1 free breakfast, underclaim of 2 paid lunches and 1 paid breakfast). The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

**Corrective Action:**

1. Train all applicable staff at the school on the SFA's updated Monthly Edit Check Worksheet procedures.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

Meal Components & Quantities - Kohala Middle (366)

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

**Finding 9000: Other Finding: Production Records**

The following issues were noted on the production records for the day of review:

Breakfast: There are inconsistencies between the recipe and production record for the Cinnamon Rolls. The production record shows that the Cinnamon Rolls contain Ultra Grain Flour, AP Flour, Eggs, Sugar and Yeast. However, the standardized recipe that was provided does not contain all of these ingredients (missing the AP flour and eggs). The recipe also shows that the yield is 105 - 3 oz servings. The production record shows that the serving size is 1 oz.

Lunch:

- The lau lau credits as 1/8 cup Additional Vegetables and 1.75 oz M/MA (based on a recipe analysis). Dexter is verifying with SFSB that the correct recipe was provided for review.
- Need a recipe for the Lomi Tomatoes.
- On the production record, the contribution for the Brown Rice is listed as "1/2 c". 1/2c is the portion/serving size. The brown rice should be credited as 1 oz eq since the portion size is 1/2 cup.
- The minimum daily requirement for vegetables might not be met (pending review of the Lomi Tomato recipe).



Program Year 2019

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met.**

Based on a review of production records and other supporting food crediting documentation for 1 week during the Review Period [10/1/18 to 10/5/18], some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Meals missing required meal components during the week reviewed:

- Friday, 10/5/18 (Lunch): Packaging for the white rice was provided on the day of review. It was determined that the white rice being used is non-creditable because it is not enriched. Based on the information provided on the production record, only 1/2 cup white rice was served at lunch on Friday, 10/5/18. This rice is non-creditable and no other grains were listed on the production record. Therefore, there were no creditable grains served for lunch on this day and the minimum daily requirement for grain was not met. 77 lunches served on this day will be disallowed.

- Week of 10/1/18 to 10/5/18 (Lunch): The minimum weekly requirement for beans was not met (0 beans served this week / short by 1/2 cup beans).

**Corrective Action:**

1. Make all of the appropriate corrections to the planned menus, production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.

2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



Program Year 2019

**Finding 9000: Other Finding: Production Record Errors**

Other issues were identified on production records from the review period:

Monday, 10/1/18 (Lunch): On the production record, unsure where the 100 per factor for the BN/LS CHIX THIGHS is from. 1/4 cup portion of broccoli is credited as 1/8 cup dark green vegetable. The correct crediting should be 1/4 cup.

Tuesday, 10/2/18 (Lunch): For the romaine lettuce (Caesar salad), portion size is 1 cup / contribution is 1 cup dk green veg. Leafy greens are credited at 1/2 the volume served (should be 1/2 cup dark green veg).

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served.

Friday, 10/5/18 (Lunch): On the production record, crediting for the iceberg lettuce is incorrect. Since the iceberg lettuce is not a leafy green vegetable (counted towards the Other vegetable subgroup), the volume served is equivalent to the creditable amount. Therefore, the iceberg lettuce served on this day should be credited as 1/4 cup Other vegetable (not 1/8 cup). Based on the information provided on the production record, it appears that the only vegetable served to Kohala Middle School on this date was the iceberg lettuce. Therefore, the minimum daily requirement for vegetables was not met.

Week of 10/1/18 to 10/5/18 (Lunch): The standardized recipe for the WG buns was provided. Based on the recipe provided for a 2 oz bun (yield 320 buns), 1 bun = 0.5 oz eq (see Grain Contribution worksheet).

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**Technical Assistance:**

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



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### General Program Compliance - Kohala Middle (366)

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Incorrect nondiscrimination statement**

The monthly menu (January 2019) posted in the dining area had the incorrect nondiscrimination statement. This was corrected onsite.

**Corrective Action:**

This finding was corrected onsite. No further corrective action required.

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.**

Kohala Middle School's cafeteria/kitchen did not have annual food safety inspection reports posted as required. This was corrected onsite.

**Corrective Action:**

This was corrected onsite. No further corrective action required.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Lanai High & Elementary (415)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: January 17, 2019

#### Commendations

##### \* Commendations Lanai High and Elementary

1. Slow start to this Administrative Review but was treated very well by School Staff and Cafeteria Staff. Thank you for your Aloha.
2. Nice topping bar in cafeteria for extras on their menu.
3. UHT Milk used for students for food safety.
4. Lots of student helpers, all washed hands, gloved and hair nets.
5. Fiscal records completed by Gordon Chew was some of the best we have seen yet.
6. Kitchen is very clean and well organized. Kitchen staff is very friendly and hard working.
7. Great job on paying invoices quickly
8. Terrific job on ATP(s). Documentation for ATP were orderly and included the invoice, and 10-Bs.
9. Inventory was terrific! There was evidence that First-In, First-Out (FIFO) was being followed. The inventory items were labeled with the arrival date of the product. Inventory matched inventory cards.

#### Technical Assistance

##### \* Menu Substitutions

Manager, if buying off bid, must ensure that any substituted items must be CN label or meet CNP pattern. These items must be filed and stored in the cafeteria office for review by SFSB Supervisor or State Agency.

##### \* Pre-K Meals

HCNP worked with cashier on 1/18/19 doing Pre-K meals to ensure that every child takes every item.

##### \* LWP, Payroll Certification, Civil Rights

HCNP assisted School Office in Wellness Plan, Payroll Certification, and Civil Rights log for Central Office. Civil Rights Book completed on site.



Suggestions

\* Food Safety

1. Not a USDA regulation, but while washing apples, please remove the sticker on them. It gives for a better presentation and lets the students know that they were washed.
2. Observed lots of mouse traps in storeroom. HCNP notes that many dunnage racks are wooden and including the main work table in kitchen. Recommend that all wooden items be removed from the kitchen and NSF approved work tables and dunnage racks. The back door is damaged on the bottom and allows for mice to enter. Needs to be repaired immediately.
3. Food temperatures (during prep and holding) should be monitored, controlled and documented. This will help protect school in case of foodborne illness outbreak.

\* Milk Boxes

Get students to take plastic off all of milk boxes and reload the milk box before they leave for the day.

\* Sample Trays

Sample trays – RTE (Ready to Eat) foods do not have to be on the sample plates to save money on your food costs. For example, three trays had UHT milk on them. While this might be SFSB policy, it is not a requirement for the USDA.

Meal Components & Quantities - Lanai High & Elementary (415)

401. DOR - meals selected by students contain all required components/quantities? Enter data.

**Finding 9000: Meal Components and Quantities - Offer versus Serve (OVS)**

During lunch service, it was observed that students did not select all of the menu items beginning with Kindergarten. The site application for this school indicated that OVS is implemented for grades 3-12. The SFSB Supervisor stated that OVS begins with Kindergarten.

The meal clerks were unable to correctly answer OVS questions. The meal clerks need OVS training. Under OVS, at least three food components must be selected and one of the components must be at least 1/2 cup fruit and/or vegetable. The school pre-plated the rice, roll, turkey, and coleslaw. Since the coleslaw was only 1/4 cup, all meals will be disallowed for those who did not take an additional fruit/vegetable to meet the 1/2 cup fruit and/or vegetable requirement. A total of 61 meals will be disallowed.

**Corrective Action:**

1. Provide OVS training to all food service staff, including the food service manager, and to all meal counting staff so staff understand what makes up a reimbursable meal under OVS.
2. Food service staff must communicate with the meal counting staff daily prior to meal service so meal counting staff understand the portions of the food items served and offered to students to determine what makes up a reimbursable meal.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Revise the site application for this school in HCNP Systems to reflect the correct grades levels that are implementing OVS. It is the SFA's responsibility to ensure all information submitted on the site applications in HCNP Systems is accurate and reflect current operations.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



Program Year 2019

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

**Finding 9000: Meal Components and Quantities - Day of Review (Forecasting)**

Forecasting was not done well on 1/18/19 at lunch. Cafeteria staff ran out of food for the middle schoolers. The middle schoolers had to wait for 10 minutes before more food was heated up for them. They clapped when the food was ready. The students then scarfed their lunch to make it to class on time. This is unacceptable and is terrible customer service. The manager is responsible for ensuring the cook continuously checks all back-up food and if running low, the cook needs to cook additional food in batches so there is enough food to serve the students.

The SFSB Supervisor explained the situation informing HCNP staff this happens often.

While waiting, HCNP saw one student go through the POS with only one hamburger on his plate (High School). After being told it was not a reimbursable meal, the cashier said they were taught a la carte sales. She was then told that she entered the meal as a reimbursable meal. Claiming a non-reimbursable meal as a reimbursable meal is not allowed under USDA regulations. The transaction was changed on the computer. A review of the computer records for 1/18/19 show a non-reimbursable meal but no money was charged. Although this is a CEP school where the student receives a breakfast and lunch free of charge, a la carte sales are not free for students.

**Corrective Action:**

1. Provide meal pattern training, Offer vs Serve training, and meal counting and claiming training to the food service manager and to all food service and meal clerks so staff understand what is a reimbursable meal.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
3. Determine why the school's computer POS is not charging for a la carte sales. Explain what was done to correct this issue.
4. The school must implement the SFA's meal charge policy when selling a la carte items. The school must distribute the SFA's written meal charge policy to the households so parents and students are informed of the policy and must distribute the written policy to school staff who are responsible for enforcing the policy. Provide documentation to demonstrate when and how this was completed.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Components and Quantities - Day of Review (Serving Size)**

On 1/17/19, it was observed that a 4 oz spoodle was used to serve the turkey. The gravy was placed in the cafeteria for self-service. The 4 oz serving size was for the turkey in gravy. Therefore, the school served more turkey than the planned amount. This adds significantly to the food cost and to the dietary specifications.

**Corrective Action:**

1. Provide training to all food service staff, including the food service manager, on how to read and complete the production records to ensure the correct amount of food is served to students.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.





407. DOR - school comply with planned menu, changes made? Enter data

**Finding 9000: Meal Components and Quantities**

On the day of review, Pre-K was served Honey Nut Chex cereal. The Honey Nut Chex exceeds the sugar limit for preschool age children under the Child and Adult Care Food Program (CACFP) meal pattern. The Honey Nut Chex cannot be served to Pre-K. Breakfast cereals must not have more than 6 grams of sugar per dry ounce.

**Corrective Action:**

1. Serve a breakfast cereal in place of the Honey Nut Chex that does not exceed the sugar limit.
2. Explain which breakfast cereal is being served in place of the Honey Nut Chex. Submit the food labels, including the Nutrition Facts Label and ingredient list to of the cereals that will be served to preschool age children.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Components and Quantities - Production Records**

Production records are incorrectly written. Here are the major problems that were identified: No leftovers are documented. Serving sizes/utensils are partially listed/not listed and cannot verify yields. Many entrees do have a recipe for them, especially condiments items. For example, Tartar sauce. No amounts are listed and the amount leftover must be recorded. Actual yields of finished product is not listed. Many of the Breakfast Production records are not filled out or are partially filled out. Adult and employee meals are not recorded for the planned and actual served. Meals planned for is two to three times higher than what was actually served for HS (example: 10/1/18 stated planned for 65 meals for HS; only 26 was actually served. On 10/2/18, 75 planned and 60 served, 10/3/18, 80 planned and 51 served, 10/4/18, 75 forecasted with 79 served, and on 10/5/18, 80 was forecasted but no amount was recorded for the amount served. The number of milk served does not always match up to the number of meals served. With OVS, the number of milk should be less than the number of milk used since students have the choice to not select milk. However, on 10/2/18, the number of milk used was more than the number of meals served (443 meals were served which includes the catered meals and 459 was the number of milk used that day). For example, on 10/2/18, the numbers of meals served including catered meals was 443, but the number of milk used for that day was 459.

**Corrective Action:**

1. Train the food service manager and all food service staff on how to complete the production record to ensure the documentation is completed correctly and ensure the meals meet the meal pattern requirements. All production records must be completed in its entirety. Remember to document the amount of leftovers, actual yield of recipes, whether or not the food is discarded or stored as leftover, the portion size to serve, and the meals counts.
2. Train the food service manager on how to better forecast the number of meals to plan for.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



**General Program Compliance - Lanai High & Elementary (415)**

*1404. Food safety plan - written, copy available?*

**Finding 9000: Food Safety**

The school has a food safety plan but the HACCP-based SOPs are not signed and dated for implementation.

**Corrective Action:**

1. Review the school's written food safety plan. Sign and date all HACCP-based SOPs.
2. Train all food service staff on the HACCP-based SOPs.
3. Provide a copy of the training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Mililani High (216)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: December 13, 2018

#### Commendations

- \* Breakfast for late students

Students were served after reported breakfast service time. This gives late-arriving students the opportunity to eat breakfast!

- \* Storage cleanliness and organization

Walk-ins and store room were clean and well-organized.

- \* Kitchen staff

Kitchen staff were open to assistance and responded accordingly.

- \* Cashier on "No ID" line

The cashier on the "No ID" line was knowledgeable about OVS and did a good job of preventing overt identification.

- \* Food safety plan

Food safety plan was well-written and organized.

#### Technical Assistance

- \* Consistency of rolls

Reviewers had the baker weigh the roll at lunch -- rolls were inconsistent in size and weight: one roll was 1.85oz, another was 1.05oz. The 1.05oz roll was taken from a chef salad. Explained that 2oz grains are required at lunch for grades 9-12. Staff added a second roll to each chef salad.

#### Suggestions

- \* Last minute fruit and vegetable

Consider keeping 1 cup fruit or vegetable near the POS in case the student does not take the minimum requirement under OVS. This will prevent the student from having to re-enter the busy meal line.

- \* Menu display

On the monthly menu, do not list alternate lunch options right below the breakfast menu. It looks like the alternate item is available at breakfast when it is actually a lunch option.



SNP Administrative Review Findings

Program Year 2019

\* Container storage

Do not re-use containers or jars for different items. In the walk-in, reviewers observed salad dressing stored in an oil container.

\* OVS Signage

Edit OVS signage at the beginning of the meal service line to include chef salad so students know of that option.

\* Meal service lines

Suggest having two lines for "No ID" students and one for ID students (currently two lines for ID and one for "No ID"). During lunch service, it was observed that the cashier was having a difficult time at the POS as students quickly moved through the line. While the cashier was obviously knowledgeable about OVS and familiar with student names, it may be easier to have two lines for the "No ID" students.

Meal Components & Quantities - Mililani High (216)

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

**Finding 9000: Other Finding: Standardized recipes are not being followed**

It is evident that bakers/cooks are not following recipes -- during lunch service, the rolls were inconsistent in size (1.85oz, 1.05 oz, etc.). Staff explained that all rolls should be the same size -- 2.0oz. Staff should be re-trained to follow recipes to ensure that the product is consistent. This will help to ensure that products are meeting meal pattern requirements.

**Corrective Action:**

1. Review the SFA's standardized recipe for the rolls. Ensure that the standardized recipe includes all of the necessary elements and that the recipe produces the desired end product.
2. Ensure all appropriate staff are using and following all of the instructions on the standardized recipe when preparing the rolls.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Other Finding: Signage**

The monthly menu is posted but the sign that shows students how to select a reimbursable meal was not current (showed lunch from the prior day). Regulations in 7 CFR 210.10(a)(2), require schools to identify reimbursable meals to students; this aims to reduce the unintended purchase of a la carte items and help students select a balanced meal.

**Corrective Action:**

1. Ensure all appropriate staff are aware of signage requirements. Assign a staff member and a backup to ensure that signage is posted daily and displays the correct menu items for the day.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

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.**

As observed on the Day of Review, cashiers need additional training on offer vs. serve (OVS). When one cashier was asked by a Specialist about what constitutes a reimbursable meal, the cashier was unable to answer the question correctly. Additionally, cashiers were observed telling students that they must go back to get a milk -- this is not necessarily required when operating OVS.

**Corrective Action:**

1. Train appropriate staff involved in meal counting on OVS requirements.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

**Technical Assistance:**

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

### General Program Compliance - Mililani High (216)

812. Meal service observation – Program benefits available to all with no discrimination?

**Finding 9000: Other Finding: Civil Rights Procedure and Complaint Log**

Civil Rights Procedure and Complaint Log were unavailable for reviewers. Regulations require that supporting documentation, including a description of procedures for receiving and handling Civil Rights complaints, be available for the State Agency's review.

**Corrective Action:**

1. Submit the current Civil Rights procedure and complaint log.
2. Provide training to all appropriate staff on the Civil Rights procedure. Ensure all appropriate staff are aware of how to access the Civil Rights complaint log.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1104. Foods sold to students – complete chart of locations, responsible entity.

**Finding 9000: Other Finding: Vending machines**

Preliminary observation of items in vending machines suggest that items may not be Smart Snack compliant. Provide to HCNP a list of items and evidence of Smart Snack compliance in all vending machines. If item(s) are found to be non-compliant, either replace with a compliant snack or alter times vending machines are in operation to students.



***Program Year 2019***

**Corrective Action:**

1. Submit documentation to demonstrate which vending machines items are Smart Snack compliant. For items that do not meet Smart Snacks requirements, either replace the item with an items that meets Smart Snack requirements, or alter the times that the vending machine is in operation so that it is not during the school day.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*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.**

Food safety inspection report is not posted. Regulations require the report to be posted in a publicly visible location. The current form that is posted in the cafeteria is not sufficient.

**Corrective Action:**

1. Ensure that the current food safety inspection report has been posted in a publicly visible location, such as in the dining area or near the meal service line. Submit documentation (photo and explanation of where the report is posted) to demonstrate that this was completed.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

*1408. Temperature logs available?*

**Finding 9000: Other Finding: Questionable temperature records**

Need copies of equipment temperature logs; Food temperatures -- evidence of misreported numbers as temperature was reported at exactly the same time of day, and temperatures almost never varied.

**Corrective Action:**

1. Ensure that kitchen staff know how to properly read and record equipment temperatures. This must include recording the accurate date, time, and temperature for equipment.

2. Submit copies of all equipment temperature logs for the entire month of last month.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Mililani Middle (238)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: January 15, 2019

#### Commendations

##### \* Mililani Middle

Kitchen is clean, neat, and orderly.

Documents were well organized.

Staff have a positive attitude and are engaged in improving their meal programs.

Receiving temperature logs were completed regularly as required and well-maintained. Commend staff for creating a typed template to make the receiving process more efficient.

##### \* Fiscal

- Thank you for having all requested documents ready and organized
- Great job on catching the past due notice that was already paid
- Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)
- Great job on paying invoices quickly

#### Technical Assistance

##### \* Menu Substitutions

Menu substitutions must be documented on the production record. All information must be changed – crediting amount, serving size, and amount needed.

##### \* Leafy Greens Crediting

Reviewed the way raw versus cooked leafy greens are credited with the food service manager. When a leafy greens are served raw, it is credited at half the volume served (if ½ cup of lettuce is served, it is credited as ¼ cup of vegetable). When leafy greens are cooked, it is credited at the volume served. (if ½ cup of cooked spinach is served, it is credited as ½ cup of vegetable).

##### \* Label Products

Date products with the month and year instead of month and day.

##### \* Food Safety Inspection

Food Safety Inspection – reminder, request for a second inspection so the Department of Health returns before the end of the school year.



Suggestions

\* Cheese Sauce

Since the cheese sauce is not creditable, consider using an alternative creditable cheese sauce so less meat is used in the chili to help reduce food cost. Using a non-creditable product contributes to calories, fat, and sodium without helping to meet the meal pattern requirements. Suggest conducting a nutrient analysis to confirm that the meals are within the USDA dietary specifications since the menu includes such 'extra' items as the non-creditable cheese.

\* Fiscal

- The payment stamp on many invoices were not completely filled out. Some were missing dates, some were not signed, many did not have the payment number. ATP 03022018 090124: None of the payment stamps on the invoices were filled out.
- Some of the Form 10-Bs were not signed or dated by the Administrator.
- It is best to keep the 10-Bs together with the invoice/ATP, not in a separate stack.

Meal Components & Quantities - Mililani Middle (238)

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

**Finding 9000: Meal Components and Quantities - Day of Review**

The following issues were noted on the day of review for the lunch meal service (1/15/19):

- 12 tortilla chips were served for the nachos. 12 chips provides 1 oz eq grain, not 2 grains as listed on the production record.
- The chili recipe lists 85/15 ground beef but the school is using 80/20 ground beef. This alters the crediting information listed on the recipe. Instead of providing 1.5 oz eq M/MA per 4 oz heaping portion 85/15 ground beef, there is only 1.25 oz eq M/MA when 80/20 ground beef is used.
- The chili recipe listed 4 oz heaping as the portion size for grades PreK-8. The cook stated that he was going to serve a 4 oz level portion. Informed the manager and SFBSB Supervisor that the recipe states to serve a 4 oz heaping scoop, not 4 oz level school. Observed one staff portion a 4 oz heaping scoop and one a 4 oz level scoop. 4 oz heaping scoop is not a standardized measurement.





### Program Year 2019

#### Corrective Action:

1. Revise the documentation (production record, production record template, recipe) used for the nachos meal served on the day of review:
  - Correct the crediting of the tortilla chips on the production record.
  - Correct the type of ground beef used on the production record.
  - Revise the recipe to reflect the type of ground beef the school is using and the correct crediting information. Also, listing "1/2 cup (4 oz spoodle) heaping" on the recipe is not a standardized measurement because "heaping" does not produce a consistent serving size amongst different serving staff. Revise the recipe to include a serving utensil that will result in a consistent serving size when used by all serving staff.
2. Make all of the appropriate corrections to the production record and template and recipe. Production records must show how the offered meals contribute to the required food components and food quantities for each meal served to each grade group every day. Ensure the corrections meet the meal pattern requirements. Submit the revised documents to demonstrate the changes listed above were corrected.
3. Train the food service manager and all food service staff on how to complete the production record and how to read and implement the information on the production record correctly to ensure the documentation is completed correctly and ensure the meals meet the meal pattern requirements.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



**Program Year 2019**

**Finding 9000: Meal Components and Quantities (Review Period)**

The meal pattern requirements were not met for lunch for the week of October 1-5, 2018:

- 10/1/18 (Chicken Sticks), the daily vegetable requirement was not met (short 3/8 cup).
- The weekly M/MA requirement was not met (short 0.5 oz eq).

Since the meal pattern requirement was not met, the entire month of October was reviewed.

The following issues were found during the month of October:

- Monday, 10/1/18 Lunch (Chicken Sticks)

Did not document grain from breading: 3 pc = 1 oz eq

- Tuesday, 10/2/18 Lunch

The grilled chicken strips do not credit oz per oz. Therefore, since a 1 oz portion was served, this credits as 0.75 oz eq.

- Wednesday, 10/3/18 Lunch

Celery will not be counted as a vegetable on this day since no documentation was written on the right half of the production record.

Romaine lettuce is credited at half the volume served. Therefore, a ¼ cup serving is 1/8 cup, not ¼ cup.

For the chili, since 80/20 ground beef was used instead of the 85/15 ground beef as indicated on the recipe, only 1.25 oz eq of meat is credited, not 1.5 oz eq.

For the cheese sauce, both the powdered cheese and cheese slices were cooked together. No recipe was provided, therefore, the sliced cheese was not counted towards the M/MA for lunch.

- Friday, 10/5/18 Lunch

Purchased pizza – only the grain was credited on the production record. The M/MA and vegetable were not credited.

The following documentation was not provided as requested:

- Yangs chow mein noodles: contains bleached wheat flour (not whole grain or enriched). No documentation was provided to show that the product meets the USDA whole grain-rich criteria.
- Tortilla Corn Chips: contains trace of lime. No documentation was provided to show that the product meets the USDA whole grain-rich criteria.
- Hummus: no documentation to validate the crediting amount towards the vegetable component.

Week of 10/8-10/12/18 Lunch:

- 10/8/18: cooked spinach was not credited correctly
- 10/10/18: cooked spinach was not credited correctly
- 10/12/18: the crediting was not adjusted for the chicken patty that was served instead of the burrito

Week of 10/22-10/26/18 Lunch:

- Did not meet the whole grain-rich criteria – tortilla chips contain trace of lime.
- 10/22/18 (Chicken Tenders): did not meet the daily vegetable requirement (short 1/8 cup).

Unable to determine if the meal pattern requirements were met for breakfast for the week of October 1-5, 2018:

- Apple Pastry: the CN label/product formulation statement was not provided to validate the crediting information.



Program Year 2019

**Corrective Action:**

1. Revise the cycle menu by:
  - Adding 3/8 cup of vegetable to the Chicken Sticks lunch (the menu used on 10/1/18). The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.
  - Ensure the school only uses creditable cheese for the cheese sauce for the Chili Cheese Potato Wedge lunch (the menu used on 10/3/18). Not using a creditable cheese resulted in the school to not meet the weekly M/MA requirement since 0.5 oz eq M/MA could not be counted for the week of October 1-5, 2018. The weekly M/MA requirement for a K-8 menu is 9-10 oz eq. Provide training to the school manager and food service staff so they all understand the crediting of food items to the meal pattern requirements and how to make appropriate substitutions.
  - Adding 1/8 cup of vegetable to the Chicken Sticks lunch (the menu used on 10/22/18). The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.
  - Submit the revised cycle menu and production record templates demonstrating the meals meet the minimum daily and weekly requirements.
2. Make all of the appropriate corrections to the production record templates and recipes. Production records must show how the offered meals contribute to the required food components and food quantities for each meal served to each grade group every day. Ensure the corrections meet the meal pattern requirements. Submit the revised documents to demonstrate the changes listed above were corrected.
3. Train the food service manager and all food service staff on how to complete the production record to ensure the documentation is completed correctly and ensure the meals meet the meal pattern requirements.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Meal Components and Quantities - Production Records**

The school had a large amount of leftovers during the month of October that were discarded. Here are some examples:

- 10/8/18: 270 servings of kalua pork and spinach, 170 servings rice, 100 servings pineapple
- 10/10/18: 120 servings macaroni
- 10/11/18: 160 servings of turkey pastrami, 125 servings canned fruit
- 10/15/18: 200 servings of Sloppy Joe
- 10/16/18: 230 servings of turkey
- 10/17/18: 230 servings of stew

**Corrective Action:**

1. Train the food service manager on how to better forecast the number of meals to plan for to prevent having a large amount of leftovers that is being discarded.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



### 501. Cafeteria staff trained on OVS?

#### **Finding 9000: Offer versus Serve**

Meal clerks do not understand what a reimbursable meal is under Offer versus Serve (OVS). They were unable to correctly answer questions about OVS.

#### **Corrective Action:**

1. Provide OVS training to all food service staff on the OVS requirements and how to implement OVS properly.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

## General Program Compliance - Mililani Middle (238)

### 811. Justice for All poster displayed in prominent location?

#### **Finding 9000: Civil Rights**

The school does not have the civil rights complaint form, log or procedure available regarding receiving and processing complaints alleging civil rights discrimination within the school meal programs.

#### **Corrective Action:**

1. Submit documentation demonstrating the school maintains a civil rights folder or binder that contains the civil rights complaint form, civil rights complaint log for each school year, and the civil rights complaint procedure.
2. Train the school staff on how to implement the documentation and how to maintain the documentation.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

### 811. Justice for All poster displayed in prominent location?

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

'School Meals Program' webpage (linked from Mililani Middle School's website) currently has the short version of the USDA's Non-Discrimination Statement. The full statement must be included so households are aware of how to submit a complaint if necessary.



Program Year 2019

**Corrective Action:**

1. Use the most current nondiscrimination statement on all program materials. The current nondiscrimination statement is available at: <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>. The full statement is everything listed in the large box on the document. It is acceptable to either add the most current full nondiscrimination statement to the webpage or add a link to the most current full nondiscrimination statement.
  2. Provide documentation demonstrating the correction was made.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1105. Foods sold to students during school day meet Smart Snacks standards?

**Finding 9160: Foods and beverages sold to students not compliant with Smart Snacks standards.**

Foods and beverages sold to students during the school day, including fundraisers, do not meet USDA Smart Snacks standards. The school sells snacks Kona Ice and Jamba Juice immediately after the end of the school day on Wednesdays on the school campus. The Kona Ice Vita-Blend does not meet the USDA Smart Snacks standards. Upon further review, the Jamba Juice 16 oz Orange Dream Machine and 16 oz Strawberry Whirl do not meet the USDA Smart Snacks standards. The school needs to either discontinue the sale of both Kona Ice Vita-Blend and Jamba Juice items or sell the product 30 minutes after the school day ends.

All foods and beverages sold on the school campus (excluding reimbursable meals), during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day), must meet regulatory requirements. This includes a la carte items sold during meals, and foods/beverages sold in vending machines, school stores, and any other venue. Also, foods and beverages sold during fundraisers must meet the Smart Snacks Standards, unless these items are not intended for consumption at school or are otherwise exempt by the State agency.

**Corrective Action:**

1. Train school staff that are responsible for the approval of any fundraisers on the USDA Smart Snacks Standards.
  2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
  3. Explain what action has been taken to ensure that the sale of all food/beverages on campus, during the school day, meet the USDA Smart Snacks Standards. Provide supporting documentation.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1406. Most recent Food safety inspection posted, visible to public?

**Finding 9000: Food Safety - Inspection Report**

The current DOH food safety inspection report was posted, however it is stapled to the bulletin board in a manner that does not permit viewers to read the full report. The report is stapled to the bulletin board on the top and bottom of the page - the 2nd and 3rd pages cannot be read without removing the staples.



Program Year 2019

**Corrective Action:**

1. Post the food safety inspection report in a manner in which it can be easily read in its entirety.
2. Explain what the school did to correct this issue and submit proof (photo) demonstrating this correction was made.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1408. Temperature logs available?

**Finding 9000: Food Safety - Temperature Logs**

Temperature logs are not being maintained properly. Equipment temperature logs were reviewed and some appeared to have temperatures that were illegible and/or appeared to be out of acceptable range. The manager explained that sometimes, the person recording the temperatures will switch between recording temperatures in Fahrenheit versus Celsius. Temperatures need to clearly indicate if it is negative number.

Equipment temperature logs for December 2018 were reviewed. The temperature recorded is illegible and/or appears out of compliance with no corrective action noted on the following dates:

- 12/2: walk-in freezer 13F, pot-wash reach-in 118F
- 12/3: walk-in freezer 13F, 328F, pot-wash reach-in 118F
- 12/10: no conversion format (Fahrenheit or Celsius) written
- 12/11: walk-in freezer 13F, pot-wash reach-in 118F
- 12/12: walk-in freezer 12.9F
- 12/13: no conversion format (Fahrenheit or Celsius) written
- 12/14: walk-in freezer 12.9F, pot-wash reach-in 118F

The acceptable range for dry storage is 50-70 degrees Fahrenheit with 50-60% humidity. The storeroom temperature was out of range on the following dates with no corrective action noted:

- 12/2: 79.2F
- 12/3: 73.2F
- 12/11: 73.4F
- 12/12: 70.2F

Equipment logs are not always dated. Train staff to write the date on all temperature logs.

**Corrective Action:**

1. Train all food service staff on how to read the thermometers correctly, how to complete the temperature logs correctly (including recording the date), and how to record temperatures correctly on all temperature logs using the same format (Fahrenheit).
2. Train staff on the appropriate corrective actions to take when temperatures are out of the acceptable range and how to document the corrective actions taken on the temperature logs.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



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

**Finding 9000: Food Safety - Storage**

The following storage issues were found during the on-site review:

- SA observed a scooping utensil (Styrofoam bowl) was stored in the salt container. This practice is not addressed in the food safety plan, however it is a DOH sanitation violation.
- Staff personal items (an open cup of orange juice, personal water containers) were being stored in the reach-in cooler near the dish washing station. A staff member mentioned that this reach-in is also occasionally used to store meal service items since it is in close proximity to the serving line. It is not acceptable to store open personal containers with food that will be served to the students.

**Corrective Action:**

1. Train all food service staff that it is not sanitary to store scooping utensils in the food product. Therefore, do not store any utensils in any food product.
2. Designate a labeled area for staff to store their personal items in the reach-in refrigerator, such as a labeled bus pan.
3. Train all food service staff to cover and store any personal food items in the designated area in the reach-in refrigerator.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



## Hawaii Department of Education

### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### Program Year 2019

#### Pahoa Elementary (381)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: April 12, 2019

#### Commendations

\* Kitchen

Kitchen was neat and orderly. FIFO principle is being implemented.

\* Appealing lunches

Lunch was tasty and appealing.

\* Document organization

Documents were organized.

\* Fiscal: Documents

Thank you for having the requested documents ready

\* Fiscal: Deposit slips

Deposit slips sampled matched the Summary Reports

\* Fiscal: Inventory

Inventory sampled matched the inventory cards.

#### Technical Assistance

\* On-Site Monitoring

Technical assistance was provided regarding the following on-site monitoring issues:

- The first reviews completed on 11/16/18 for breakfast and lunch were discussed with staff on 12/7/18 (the date of the second breakfast review). The SFS Supervisor explained that the administrative staff were not present the day of the onsite review but it was discussed verbally with staff. This should have been documented on the onsite review so it is clear that the review was discussed prior to the second review.

- The breakfast review lists the dates of 2/21/19 and 2/22/19. The last page indicated that a follow-up review was required – the supervisor explained that the review was done on 2/21/19 and the follow-up was done on 2/22/19. This should have been clearly documented. Documentation of the follow-up review should have been done on a separate sheet.

- The lunch review lists the date of 2/21/19 but the last page was signed and dated 2/22/19. The supervisor explained that the review was done on 2/21/19 and the follow-up was done on 2/22/19. Documentation of the follow-up review should have been done on a separate sheet.





## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

\* Fiscal: DOE Form 10-B

Reminder: for items purchased that are not on a price list, a DOE Form 10-B Record of Small Purchase must be fully completed. If lowest quotation is not selected, justification needed.

\* Fiscal: Daily printout reports

Best practice if the eTriton daily printout reports are verified and signed daily:

- eTriton Manager's Summary report (RPT415) page 3
- eTriton Bank Deposit (RPT401)

\* Fiscal: Payroll certification forms

Some Payroll Certification forms were completed incorrectly: period was July 1, 2017 to June 30, 2018 and signed 4/26/18. Forms should be signed twice a year and the signature must be after the fact. Usually January-June & signed in July and July-December & signed in January.

#### Meal Counting & Claiming - Pahoa Elementary (381)

325. Review Period meal counts by category correctly used in the claim? Enter data.

##### **Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.**

The SFA's claim for the school for the Review Period does not match the school's daily meal count documentation and State agency's validated meal counts by category for the school for the Review Period. The school's edit check worksheet and manager's summary report show 5905 lunches were claimed, however the SFA claimed 5910 lunches (overclaim of 5 lunches). The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

##### **Corrective Action:**

1. Train all applicable staff at the school on the SFA's updated Monthly Edit Check Worksheet procedures.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

#### Meal Components & Quantities - Pahoa Elementary (381)

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

##### **Finding 9000: Unable to identify reimbursable meals**

During lunch observation, the preschool students did not have a vegetable – only rice, popcorn chicken, fruit slushy, and milk. The meal clerk was about to count the meals but the reviewer instructed him to stop. The meal clerk was not able to identify what the students were missing on their lunch tray. The SFS Supervisor talked with the food service staff and the staff served the preschool students pre-portioned salad and baked beans. All preschool meals were reimbursable, but the meal clerks need additional training on how to identify a reimbursable meal. It is unacceptable to assume the food service staff is serving a reimbursable meal.



Program Year 2019

**Corrective Action:**

1. Provide training to meal clerks on identifying reimbursable meals.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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

**Finding 9000: Breakfast Production Records: Incorrect Information (Review Period)**

Issues were noted with the information entered on breakfast production records from the review period:

- Pre-K students are comingled with older grades during breakfast. Pre-K is not listed on the production record because their planned numbers are included in the counts for K to 8. When looking at the production record, it cannot be determined that Pre-K students attend the school. Suggest separating the Pre-K numbers in the "Planned For" section or indicating them in the "Grade" column of the production record, however a consistent method must be used.
- Monday, 10/1: Apple Pastry: "size of serv" is 1 stick or 83g (not 4.82oz). 1 MA and "Fruit Equiv 1/2c" is typed. According to the CN label, this item is not creditable towards the meat/meat alternate or fruit component. WG Toast: for K-8, a 1 oz piece of toast credits as 1 oz eq grain, not 2 grain. Milk is not listed on the top part of the production record.
- Tuesday, 10/2: Breakfast Slider: the crediting is missing. The plan for number and total amount needed is calculated incorrectly.
- Wednesday, 10/3: Oranges: why does the production record show "serve with fr toast only"? French toast was not served on this day, but the oranges were served. Apples: production record says "served with pancake and smoothy". Smoothy was not served on this day. WG Toast: for K-8, a 1 oz piece of toast credits as 1 oz eq grain, not 2 grain.
- Thursday, 10/4: Scrambled eggs: crediting is incorrect. Per USDA FBG: for Pre-K, 1/2 oz egg credits as 1/4 oz eq M/MA. For K-8, 1 oz egg credits as 5/8 oz eq M/MA.
- Friday, 10/5: Pork link: crediting is incorrect. For Pre-K, 1 link credits as 1/2 oz M/MA (not 1M). For K-8, 2 links credit as 1 oz M/MA (not 2 M).

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: These issues were corrected onsite however findings will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



Program Year 2019

**Finding 9000: Lunch Production Records: Incorrect Information (Review Period)**

Issues were noted with the information entered on lunch production records from the review period:

- Tuesday, 10/2/18: Local hd cabbage: the per 100 factor being used is for raw cabbage. Need to use the factor for cooked, shredded cabbage since it is cooked in the fried noodles. Therefore, the amount needed is not enough to provide for 496 – 1/8 cup servings for PK-8. Need a total of 17.75#. Egg Roll: missing the grain (1 oz eq) crediting.
- Wednesday, 10/3/18: Breaded chix tenders: 3 pieces is equivalent to a 4.5 oz serving (not 3.3 oz as). 3 pieces credits as 1 oz eq grain (not ¾ cup).
- Thursday, 10/4/18: Chili: the per 100 factor for the ground beef is for 85/15. The label provided for the ground beef indicates 80/20. The calculated amount needed is not enough to provide for 496-1.5 oz servings. A total of 62.99# is needed for PK-8.
- Friday, 10/5/18: Pizza crust: based on a review of the recipe for the Pourable Pizza Crust, the recipe that yields 5 pans @ 24 pieces (for PK-8) credits as 2.25 oz eq grain. The recipe that yields 5 pans @ 20 pieces (for 9-A) credits as 2.75 oz eq grain.
- Monday, 10/15/18: Breaded chicken strips: size of serv for 3 pieces is 4.5 oz (not 3.30 oz). Grain crediting for 3 pieces is 1 oz eq grain (not ¾ G).
- Tuesday, 10/16/18: On the production record, the per 100 factor was not corrected for the 80/20 ground beef. The formula for the amount needed is rounding down to the nearest whole number: ensure that the amount needed is rounded up to prevent having an insufficient amount of an ingredient.
- Wednesday, 10/17/18: Broccoli is not credited at ½ the volume served (1/2 cup portion credits as ½ cup vegetable, not ¼ cup).
- Thursday, 10/18/18: On the production record, the per 100 factor was not corrected for the 80/20 ground beef. The formula for the amount needed is rounding down to the nearest whole number. Ensure that the amount needed is rounded up to prevent having an insufficient amount of an ingredient. Hummus: 2 oz cup of hummus credits as 1/8 cup legume. Pineapple chunks: the per 100 factor and units of measure are incorrect, causing the total amount needed to be incorrect.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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



Program Year 2019

**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable.

- Lunch, 10/2/18: Chicken strips: according to the CN label for the grilled chicken strips, a 2.35 oz portion of chicken is needed to provide 1 oz eq M/MA. The serving size listed on the production record is 1/2 oz for PK and 2 oz for K-8. Therefore, the grilled chicken provides 0.25 oz eq M/MA for PK and 1.5 oz eq M/MA for K-8. As a result, the minimum daily requirement for M/MA for PK was not met (short 0.25 oz eq M/MA).
- Lunch, 10/3/18: The minimum daily requirement for vegetables is not being met for K-8 (only 5/8 cup was served, short 1/8 cup).
- Lunch, 10/4/18: The production record indicates that the cheese slice was not served to PK. Therefore, the minimum daily requirement for M/MA for PK was not met.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**Technical Assistance:**

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

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

**Finding 9000: OVS: Meal service not in accordance with the site's application**

Pahoa Elementary's site application indicates that there is OVS at lunch for grades 3-6. However, during the lunch, it was observed that there is OVS for grades K-6. Revise the site's application in HCNP Systems. This was corrected onsite.

**Corrective Action:**

This was corrected onsite during the review. No further corrective action needed.

501. Cafeteria staff trained on OVS?

**Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.**

One of the meal clerks was not able to adequately answer what a reimbursable meal is under OVS.

**Corrective Action:**

1. Provide additional training to all meal clerks, including substitute meal clerks.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



Program Year 2019

Technical Assistance:

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

General Program Compliance - Pahoa Elementary (381)

904. On-site monitoring review – CA required in general areas of review?

**Finding 9000: Incomplete SFA On-Site Monitoring Form**

The SFA On-site Monitoring form that is being used by SFSB is dated 7/17/18 at the bottom of the form and consists of three pages. The form does not contain all of the review areas that are listed on the “School Food Authority On-site Review Checklist” from USDA (see SP 56-2016) or from HCNP’s website: <http://hcnp.hawaii.gov/overview/nslp/>. Use HCNP’s form or update SFSB’s form to include at a minimum all questions that are listed on USDA’s or HCNP’s form.

**Corrective Action:**

1. Ensure that the SFA’s On-Site Monitoring form includes all of the required areas of review. Submit the On-Site Monitoring form that will be used.
2. Provide training to appropriate staff about the On-site Monitoring form. Topics must include the required review areas and how to complete the form.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB’s next Administrative Review to ensure corrective actions have been implemented SFA-wide.

904. On-site monitoring review – CA required in general areas of review?

**Finding 9000: On-Site Monitoring Follow Up Review**

The SFS Supervisor completed the SFA On-site Monitoring form prior to February 1. However, the follow-up for lunch was not completed within 45 days. The first review was completed on 11/16/18 and the follow-up for lunch was done on 1/30/19.

**Corrective Action:**

1. Provide training to appropriate staff about the On-site Monitoring form. Topics must include the required review areas and how to complete the form.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB’s next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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



***Program Year 2019***

**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.

- Temperature is not appropriately maintained for equipment. School had equipment temperature logs available for review. There were days where the temperature for the equipment was not in the acceptable range, however no noted corrective action was taken. For example, on 9/26/18, the walk-in chiller was logged at 47 F (temperature taken at 6:00 am). This is out of range and no noted corrective action was taken. Address out-of-range equipment temperatures immediately and document any corrective action that was taken.
- Old product was observed in the store room. There were two cases of French Dressing that were from 2017. The received dates on the cases were 9/25/17 and 12/12/17. There were 1-1/2 cases of Dijon Honey Mustard Dressing from 2017. Both cases have a manufactured date of 8/16/17 and the received dates were 9/29/17 and 10/16/18.
- Unlabeled food was observed in the refrigerator. A pan of coffee cake was in the reach-in refrigerator. The pan was not labeled or dated.

**Corrective Action:**

1. Provide training to all appropriate staff on the written food safety plan, including proper food storage and monitoring and recording temperatures.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



# Hawaii Department of Education

## SNP Administrative Review Findings

## DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Pukalani Elementary (426)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: April 16, 2019

#### Commendations

##### \* Meal Service

Service line was efficient and students seemed to have ample time to eat during their lunch period.

##### \* Fiscal

- Thank you for having all requested documents ready and well organized
- Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)
- Deposit slips matched Manager's Summary Reports
- Inventory was terrific. Inventory card matched inventory on hand. We found evidence that FIFO was being practiced.

#### Technical Assistance

##### \* Food Safety Inspection Report

An older version of the DOH's food safety inspection report (dated 10/19/18) was posted in the dining area. The SFSM was instructed to replace the outdated report with the most recent report from 2/9/19.

##### \* Temperature Log

On 11/20/18, explained to the SFSM that the appropriate codes on the Food Temperature Log need to be used. For example, if the food is being reheated, use the code for reheating (not cooking).

#### Suggestions

##### \* Onsite Reviews (MC-7 form)

SFSB Supervisor completed two onsite reviews (MC-7's) before February 1st as required, however the first review was completed on 10/15/18 and the second was completed three days later on 10/18/18. Suggest that completion of the onsite reviews be more spaced out (but still completed by February 1st) to provide a more varied assessment of the operation and to ensure that the school has adequate time to implement any corrective actions.

#### Meal Components & Quantities - Pukalani Elementary (426)

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

##### **Finding 9000: Meal Components and Quantities**

The meal pattern requirements were not met for the week of October 1-5, 2018. Also, numerous issues were found with the production records.

Monday, 10/1/18 Lunch



## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

- Popcorn Chicken: Amounts listed in the Size of Serving column is incorrect. 9 pieces weigh 2.52 oz. 12 pieces weigh 3.36 oz.

Tuesday, 10/2/18 Lunch (Philly Cheesesteak)

- Beef for Philly Cheesesteak: the minimum daily M/MA requirement was not met for Pre-K (short 0.25 oz eq).
- Beef for Philly Cheesesteak: the wrong Per 100 Factor is used. This resulted in not enough beef was prepared. For example, for K-8, 51.29# of beef should have been prepared for a 2 oz eq M/MA, not 29.4#. Therefore, K-8 only received 1 oz eq M/MA, not 2 oz eq.

Wednesday, 10/3/18 Lunch (Chicken Tenders)

- Chicken Tenders: 3 pieces provides 1 oz eq grain, not 0.75. Also, the amount listed in the Size of Serving column is incorrect. The weight of 3 pieces is 4.5 oz, not 3.3 oz.
- B. Carrots: 1/8 cup is listed for K-1 and 1/4 cup is listed for 2-5. The meal pattern grade group is K-5 so grades K-5 should be served the same portion.
- The daily vegetable requirement was not met for K-5 (short 3/8 cup).

Thursday, 10/4/18 Lunch (School-made Pizza)

- Pizza: is a different pizza made special for Pre-K? If not, explain how 1 oz of mozzarella cheese is served for Pre-K but 2 oz for K-8?
- Pizza: the production record lists 41.21# of mozzarella cheese is needed but only 40# were used. Also, 10.35# of cheddar was needed but only 10# were used. This means 1.56# (25 oz) of cheese was not used. Why was the production record not followed?
- Pizza crust: according to the recipe provided, the adult serving size provides 2.5 oz eq grain, not 3 oz eq.
- The daily vegetable requirement was not met for K-8 (short 1/8 cup).
- Peaches: the amounts for Pre-K are not consistent. 1/4 cup is listed as the contribution but 1/2 cup is listed as the Size of Serving. Canned fruit is credited as the amount served, not half of the amount.

Friday, 10/5/18 Lunch (Cheeseburger)

- The daily fruit requirement was not met for K-8 (short 1/4 cup).

10/1-10/5/18: weekly fruit requirement for lunch was not met for K-5 (short 1/4 cup)

Breakfast menu only lists one option. All breakfast options must be listed on the menu.

Monday, 10/1/18 Breakfast

- Apple Pastry: production record lists contribution as 1/2 cup fruit. Submit documentation to support this. If there is no documentation, remove the crediting amount.

Tuesday, 10/2/18 Breakfast

- Sliders: contribution is not listed. Also, Size of Serving listed is incorrect. Two sliders weigh 2.54 oz, not 2 oz.

Thursday, 10/4/18 Breakfast

- Coffee Cake: according to the recipe provided, one serving provides 2 oz eq, not 1.
- Pork Links: no contribution was listed and the Size of Serving is incorrect. Two links weigh 1.36 oz, not 1 oz. Two links provide 1 oz eq.
- Pork Links: the Per 100 Factor and Amount Needed are incorrect.





## Hawaii Department of Education

### SNP Administrative Review Findings

### DOE School Food Services Branch (1434-6)

#### Program Year 2019

Friday, 10/5/18 Breakfast (Smoothie and Cinnamon Toast)

- The daily fruit requirement was not met (short ½ cup for students who selected the cereal option).
- Provide label for pineapple juice used for the smoothie.

Since both the lunch and breakfast meal pattern requirements were not met, the rest of October must be reviewed.

Monday, 10/15/18 Lunch

- Provide cookie recipe

Tuesday, 10/16/18 Lunch

- Grilled Chicken Strips: the CN label states 2.35 oz chicken provides 2 oz eq M/MA. Review and update the amounts listed in the Size of Serving, Per 100 Factor, and Amount Needed columns.

o The amounts in the Amount Needed column were enough to provide the following:

Pre-K: 1.25 oz eq, not 1.5 oz eq. This does not meet the daily M/MA requirement (short 0.25 oz eq).

K-8: 1.5 oz eq, not 2 oz eq.

Adults: 2.5 oz eq, not 3 oz eq.

- Provide recipe for Baked Chicken Pasta
- Pasta: ¾ cup of pasta credits as 1.5 oz eq, not 1.25 oz eq.

Wednesday, 10/17/18 Lunch

- Chicken Nuggets: the amounts listed in the Per 100 Factor and Amount Needed columns are incorrect. The total amount of chicken nuggets that was needed was 1,513 pieces, not 1,210 pieces.

- Hummus – were 2 pieces served to everyone? If so, change the Size of Serving to 2 pieces or 4 oz.

Thursday, 10/18/18 Lunch

- Ground beef: was 85/15 or 80/20 used?
- If 80/20 was used, the Per 100 Factor is incorrect. The Per 100 Factor for 1.5 oz eq is 12.7, not 12.5. The Per 100 Factor for 2 oz eq is 17, not 16.8. Since the incorrect factor was used, the oz eq was less than what was listed on the production record. Pre-K had 1.25 oz eq M/MA per serving and K-8 had 1.75 oz eq M/MA per serving.
- What was served - Baked Spaghetti or Creole Macaroni? Both were listed on the production record. Provide the recipe that was used.

Monday, 10/22/18 Lunch

- Type of juice was not documented. Remember to record the type of juice served.

Tuesday, 10/23/18 Lunch

- Ground beef: production record lists "FC 85/115". Ground beef from Y. Hata is 80/20. The Per 100 Factors are incorrect. The Per 100 Factor for 1.5 oz serving is 12.7, not 12.6. The Per 100 Factor for 2 oz serving is 17, not 16.8. The daily M/MA requirement was not met for K-5 (short 0.25 oz eq).
- Nachos chips: the manager stated that the chips were weighed. He served 2 oz for ¼ cup portion (Pre-K) and 4 oz for ½ cup portion (K-5). Weight is different from volume. A 2 oz portion provides 2.25 oz eq grain, not 1 oz. A 4 oz portion provides 4.5 oz eq grain, not 2 oz. The SFS Supervisor explained that there is a breakout page that lists the number of chips to serve.

Wednesday, 10/24/18 Lunch

- The daily vegetable requirement was not met for grades K-1 (short 3/8 cup).
- Crinkle Carrots: the production record lists 1/8 cup for K-1 and ¼ cup for grades 2-5. The meal pattern grade group is K-5



## Hawaii Department of Education

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### SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

#### *Program Year 2019*

so grades K-5 should be served the same portion.

- Chicken Tenders: 3 pieces = 1 oz eq grain, not 0.75.

Thursday, 10/25/18 Lunch

- The daily vegetable requirement was not met for grades K-5 (short ¼ cup).

Friday, 10/26/18 Lunch

- The daily fruit requirement was not met for grades K-5 (short ¼ cup).

Monday, 10/29/18 Lunch

- Turkey Ham is listed at the top of the production record but Turkey Pastrami is listed on the bottom of the production record. Document all substitutions that are made and show the new amounts for all columns in that row.

- Turkey Ham: the CN label states a 2 oz portion provides 1 oz eq M/MA. The manager stated he served the amounts listed in the Size of Serving column (1.5 oz for PreK and 2 oz for K-5). The Pre-K serving size contributed 0.75 oz eq. The K-5 serving size contributed 1 oz eq. The daily M/MA requirement was not met for Pre-K (short 0.75 oz eq).

Tuesday, 10/30/18 Lunch

- Ground beef: production record lists "FC 85/115". Ground beef from Y. Hata is 80/20. The Per 100 Factor is listed as 13 for a 1.5 oz serving. According to the Food Buying Guide, the Per 100 Factor for 80/20 ground beef is 12.7 for a 1.5 oz serving.

Due to all of the issues noted above, additional training needs to be provided to the manager.



Program Year 2019

**Corrective Action:**

1. Revise the cycle menu by:

- Adding 0.25 oz eq M/MA for Pre-K to the Philly Cheesesteak lunch. The minimum daily M/MA requirement for Pre-K is 1.5 oz eq M/MA.
- Adding 3/8 cup of vegetable for K-5 to the Chicken Tenders lunch. The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.
- Adding 1/8 cup vegetable for K-5 to the Pizza lunch. The minimum daily vegetable requirement for a K-8 menu is 3/4 cup vegetables.
- Adding 1/4 cup fruit for K-5 to the Cheeseburger lunch. The minimum daily fruit requirement for a K-8 menu is 1/2 cup fruit.
- Adding 1/2 cup fruit to the cereal with toast option (on the day of Smoothie and Cinnamon Toast breakfast). The minimum daily fruit requirement is 1 cup fruit.
- Adding 0.25 oz eq M/MA for Pre-K for the Baked Chicken Pasta lunch. The minimum daily M/MA requirement for Pre-K is 1.5 oz eq M/MA.
- Adding 0.25 oz eq M/MA for K-5 for the Crispy Nachos lunch. The minimum daily requirement for K-5 is 1 oz eq M/MA.
- Adding 3/8 cup vegetable for K-1 for the Chicken Tenders lunch. The minimum daily requirement for K-5 is 3/4 cup vegetables.
- Adding 1/4 cup vegetable for K-5 for the Teriyaki Chicken lunch. The minimum daily vegetable requirement is 3/4 cup vegetables.
- Adding 1/4 cup fruit for K-5 for the Cheeseburger lunch. The minimum daily fruit requirement is 1/2 cup fruit.
- Adding 0.75 oz eq M/MA for Pre-K for the Turkey Ham Sandwich lunch. The minimum daily M/MA requirement is 1.5 oz eq M/MA.
- Submit the revised cycle menu and production record templates demonstrating the meals meet the minimum daily and weekly requirements.

2. Make all of the appropriate corrections to the production record templates and recipes. Production records must show how the offered meals contribute to the required food components and food quantities for each meal served to each grade group every day. Ensure the corrections meet the meal pattern requirements. Submit the revised documents to demonstrate the changes listed above were corrected.

3. Train the food service manager and all food service staff on how to complete the production record to ensure the documentation is completed correctly and ensure the meals meet the meal pattern requirements.

4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBS's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

**Finding 9000: Offer vs Serve**

The school is not properly implementing offer vs serve (OVS). At lunch on 11/20/18, the beans, corndog, and juice were pre-plated. At lunch on 4/16/19, the taco, pineapple and potato wedges were pre-plated. Under OVS, the pre-plated meal should have consisted on 1/2 cup fruit or 1/2 cup vegetable and two other components. The goals of OVS are to reduce food waste in the school meals programs while permitting students to decline foods they do not intend to eat.

Pukalani Elementary's site application indicates that there is OVS at lunch for grades K-5. However, during the lunch, it was observed that there is OVS for grades 2-5. The site application was corrected onsite.



Program Year 2019

**Corrective Action:**

1. Provide OVS training to all food service staff on the OVS requirements and how to implement OVS properly.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

501. Cafeteria staff trained on OVS?

**Finding 9000: Offer vs Serve Training / Recordkeeping**

Although the meal clerk was able to properly identify a reimbursable meal under OVS at lunch, the meal clerk stated that OVS training was last provided in February 2018. The SFMSM stated that the meal counter was trained in OVS however training documentation was not retained.

Train all staff (food service and meal clerks, including any substitutes) annually on OVS.

**Corrective Action:**

1. Provide OVS training to all food service staff on the OVS requirements and how to implement OVS properly.
2. Maintain training documentation. DOE rules required documentation be maintained a minimum of 6 years plus the current school year.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**General Program Compliance - Pukalani Elementary (426)**

811. Justice for All poster displayed in prominent location?

**Finding 9000: Civil Rights - And Justice for All Poster**

The And Justice for All poster is posted in the office but it is printed on 8-1/2 "x11" paper. The And Justice for All poster must be the full size (11" x 17") provided by HCNP.

**Corrective Action:**

1. Remove the 8 -1/2" x 11" And Justice for All poster in the office. Post the 11" x 17" And Justice for All poster.
2. Submit a photo to demonstrate the appropriate poster has been posted.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

811. Justice for All poster displayed in prominent location?



#### *Program Year 2019*

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

The nondiscrimination statement posted on the school's website is not correct. The most current version of the nondiscrimination statement is available on HCNP's website at: <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>

#### **Corrective Action:**

1. Post the most current nondiscrimination statement on the school's website.
  2. Submit documentation demonstrating the nondiscrimination statement was corrected (such as a screen shot).
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

#### *812. Meal service observation – Program benefits available to all with no discrimination?*

#### **Finding 9000: Medical Statements**

School is using the old J-1 form (from 2014). Medical Diagnosis is no longer allowed to be requested - school should be using revised form as it does not ask for Medical Diagnosis.

#### **Corrective Action:**

- Immediately stop using the J-1 form from 2014. Use the revised form from the SFA that does not ask for Medical Diagnosis. Submit documentation to demonstrate the school is using the revised form and not the form from 2014.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

#### **Finding 9000: SFA On-site Monitoring**

The SFA On-site Monitoring form that is being used by SFSB is dated 7/17/18 at the bottom of the form and consists of three pages. The form does not contain all of the review areas that are listed on the "School Food Authority On-site Review Checklist" from USDA (see SP 56-2016) or from HCNP's website: <https://hcnp.hawaii.gov/overview/nslp/> (click on Program Resources, then Meal Counting and Point of Service Review, then Form MC-7 SFA On-site Review Checklist).

#### **Corrective Action:**

1. Use HCNP's form or update SFSB's form to include at a minimum all questions that are listed on USDA's or HCNP's form.
  2. Submit a copy of the SFA On-site Monitoring form that SFSB is implementing that contains all required questions and areas of review.
- NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



Program Year 2019

1407. SFA written food safety plan implemented?

**Finding 9000: Food Safety**

The written food safety plan is not being implemented. The following issues were found:

- Several items in the refrigerators/freezers were not labeled/dated (bbq ribs, macaroni – store room, pork link sausage, unknown yellow food item). All items that are not in their original packaging/box should be labeled w/ date.
- During lunch service, it was observed that two student monitors did not wash their hands before putting gloves on to work on the service line. All food service staff, including student monitors, must follow food safety and sanitation requirements.
- Scoops were found inside of rice and sugar containers. Scoops should be stored outside of the product to prevent potential cross-contamination.

**Corrective Action:**

1. Provide training to all food service staff to ensure the written food safety plan is implemented properly. Train on all applicable standard operating procedures (SOPs) that pertain to the issues found during the onsite review.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

Other Federal Programs - Pukalani Elementary (426)

1700. ASSP – areas identified requiring TA, CA?

**Finding 9000: Afterschool Snack Program**

The on-site review form (dated 10/15/18) mentions that a backup roster w/ barcodes is to be used if/when the POS computer is not working. During ASP today, the MCA had to restart the computer and therefore needed to use a paper roster for meal counting. However, it appeared the MCA did not use the document described in the on-site review as the form used did not contain barcodes and the MCA had to transfer the counts to the computer once it was rebooted.

**Corrective Action:**

1. Train all meal clerks, including substitute meal clerks, on meal counting. Ensure training includes the primary method of meal counting and the back -up method so all meal clerks understand how to count meals when the computer POS is not working.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Waianae Intermediate (273)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: March 14, 2019

#### Commendations

- \* Student feedback during meal service

Commend the school on implementing new ideas during meal service, including placing tablets in the cafeteria for students to rate and provide feedback on the meal.

- \* Cleanliness and organization

Kitchen was clean and organized. Staff were attentive and helpful.

- \* Documentation

Documentation was organized.

- \* Fiscal - Documents

Thank you for having the requested documents ready and organized.

- \* Fiscal - ATP

Great job on correctly categorizing object codes on the ATP (ie cafeteria supplies, custodial supplies)

- \* Fiscal - Inventory

Inventory sampled matched the inventory cards.

#### Technical Assistance

- \* Substituting vegetables from the same subgroup

The manager changed the planned menu for lunch on Friday, 3/15/19. Instead of serving broccoli, carrots and coleslaw, baked beans and house salad were served. TA was provided to use a vegetable from the same subgroup when making substitutions to ensure that the required minimum weekly amount for each vegetable subgroup is still met.

- \* Pre-plating and offer versus serve

At lunch on Thursday, 3/14/19, the kitchen pre-plated the cheeseburger/chicken patty sandwich with the apple slices and potato rounds. This contributes to 4 meal components. Ideally under offer versus serve, students should be able to select at least 3 out of the 5 meal components.



### Program Year 2019

#### \* Production records

TA was provided to the manager to ensure that production records are completed in its entirety. Document substitutions consistently at the header of the production record and in the body. Complete planned and production numbers for all item substitutions.

#### \* Fiscal - DOE Form 10-B

Just a reminder: any items purchased that are not on a price list, a DOE Form 10-B Record of Small Purchase must be fully completed. Newest version rev. 6/2018.

From the sample selection, the Form 10-Bs on 2/24/18, 2/15/18, 7/21/17 were not signed by Administrator.

### Suggestions

#### \* Set-up of breakfast meal service

On Friday, 3/15/19, the reviewers observed that students were not taking the orange wedges during the first breakfast service. This may have been because the oranges were on a pan wrapped in clear wrap with the sample trays placed in front of them, perhaps giving the appearance that the oranges were not available to take. During the second breakfast service, the serving line was set up differently, with the oranges placed unobstructed on a serving cart. More students took orange wedges during the second meal service. Consider re-evaluating the set-up of the serving line to make offered items more accessible to students.

### Other Federal Programs - Waianae Intermediate (273)

#### 5. On-site observation – Snack counts reasonable, Meal Service operation compliant?

##### **Finding 9000: Afterschool Snack Program: Changes in Anticipated Enrollment**

During snack service, the program ran out of oatmeal bites towards the end of snack service. 9 students had to wait to receive their reimbursable snack while an acceptable alternate (Rice Krispie treats) was retrieved. Ensure that changes in anticipated enrollment are communicated to kitchen staff. The manager should use these anticipated changes to forecast production quantities.

##### **Corrective Action:**

1. Submit a Standard Operating Procedure (SOP) on how the school will communicate changes in anticipated enrollment (such as students who will be off-campus for a field trip during meal service) to the school food services manager. The manager should use these anticipated changes to forecast production quantities.

2. Train all appropriate staff on the SOP. Submit training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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





***Program Year 2019***

**Finding 9000: Other Finding**

The following issues were found with menu documentation from the Review Period:

Afterschool Snack

- Tuesday, 10/2: the serving size for one tortilla is 45g or 1.56 oz, not 0.78 oz.
- Thursday, 10/4: the recipe for the shows "Comm Bread Flour" and "Whole Wheat Flour". SFSM confirmed that only whole wheat flour is used. Correct the recipe to show the correct amount and types of flour used.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**Meal Components & Quantities - Waianae Intermediate (273)**

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

**Finding 9000: Other Finding**

On Thursday, 3/14/19, staff mentioned that approximately 300 students would be off-campus for a field trip. Despite the decreased enrollment for the day, the kitchen ran out of hamburger patties during lunch service. The staff prepared chicken patties as an acceptable alternate for the hamburger patties. Approximately 36 students had to wait in line for at least 15 minutes to receive their reimbursable meals. About 4 students exited the line because they did not want to wait to receive their lunch. Ensure that changes in anticipated enrollment are communicated to kitchen staff. The manager should use these anticipated changes to forecast production quantities.

**Corrective Action:**

1. Submit a Standard Operating Procedure (SOP) on how the school will communicate changes in anticipated enrollment (such as students who will be off-campus for a field trip during lunch meal service) to the school food services manager. The manager should use these anticipated changes to forecast production quantities.
2. Train all appropriate staff on the SOP. Submit training documentation (sign-in sheet, date of the training, agenda).

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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

**Finding 9000: Other Finding**

Milk usage and inventory is recorded on the inventory cards but not on the production records. Production records must be completed in its entirety.



Program Year 2019

**Corrective Action:**

1. Train school food services manager and any meal service staff responsible for entering information on the production record.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

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

**Finding 9000: Other Finding**

Errors were identified on completed production records:

Breakfast

- Monday, 10/1: serving size for the Portuguese sausage 1.75 oz or 3 pieces, not 1 oz. This was corrected on site.
- Tuesday, 10/2: the "plan for" number for the mixed fruit was crossed out, and the "amt needed" was illegible. At least 21 cans of mixed, drained fruit is needed to get 385 – ½ cup servings. The juice is incorrectly credited as a grain. The contribution is ½ cup fruit and the "size of serv" is 4 oz. This was corrected on site.
- Wednesday, 10/3: crediting for the toast is 1 oz eq grain. 4 oz of yogurt credits as 1 oz eq meat/meat alternate. The day of production numbers are not completed for the orange wedges. This was corrected on site.
- Thursday, 10/4: day of production numbers are not completed for the apple wedges. Crediting for the Chex cereal and toast appear to be combined. Each item must be credited separately. This was corrected on site.
- Friday, 10/5: the crediting for the Chex cereal and the toast is incorrect. 1 1/8 oz of Chex cereal credits as 1 oz eq grain, and 1 oz of toast credits as 1 oz eq grain. This was corrected on site.

Lunch

- Monday, 10/1: the 2 oz WG Bun credits as 2 oz eq grain. This was corrected on site.
- Wednesday, 10/3: one 1.5 oz tortilla credits as 1.5 oz eq grain. This was corrected on site.

**Corrective Action:**

1. Make all of the appropriate corrections to the production record templates and recipes. Ensure the meal pattern requirements are met after making the corrections.
2. Submit the revised documents to demonstrate the changes listed above were corrected.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

General Program Compliance - Waianae Intermediate (273)

811. Justice for All poster displayed in prominent location?

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

The non-discrimination statement that is printed on the March breakfast menu is incorrect and contains spelling errors.

**Corrective Action:**

This was corrected on site by the manager. No further corrective action needed.



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

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

On the last page of the SFSB on-site monitoring form (MC-7), the SFSS did not indicate if corrective action is required and/or if an unannounced follow-up review would be conducted, and did not provide a signature. Therefore, on-site monitoring for this school is considered to be incomplete.

**Corrective Action:**

1. Complete on-site monitoring forms in its entirety. The results of on-site monitoring must be reviewed with all appropriate staff, and signed by all parties involved in the review.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

1105. *Foods sold to students during school day meet Smart Snacks standards?*

**Finding 9160: Foods and beverages sold to students not compliant with Smart Snacks standards.**

It appears that most fundraising items listed on the Form 422 – Money Raising Activity form do not meet USDA Smart Snacks guidelines. For example, some of the items listed on the form include Slush Puppies, World's Finest Chocolates, candies, teri beef sticks, Spam musubi, chips, and Cup of Noodles. Staff stated that food/beverage sales begin after the Afterschool Snack Program is completed at 2:35pm, which is less than 30 minutes after the end of the school day. Per USDA Smart Snacks guidelines, food/beverage items that do not meet Smart Snacks guidelines must be sold no sooner than 30 minutes after the end of the school day.

**Corrective Action:**

1. To meet USDA Smart Snacks requirements, the school must either: 1) conduct fundraising of non-compliant food and beverage items no sooner than 30 minutes after the end of the school day, 2) sell only food/beverage items that meet Smart Snacks guidelines, using the Alliance for a Healthier Generation's Smart Snacks Product Calculator to assess if these items meet Smart Snacks requirements, or 3) obtain an exemption from Smart Snacks standards. Note: HCNP permits up to two exemptions per school year for fundraisers that are no more than one week in duration.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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.**

Proper HACCP principles not observed:

- Staff are not consistently documenting the cooking temperatures of food items – most days only the cold holding and hot holding temperatures are being documented.
- Staff are not completing the cooling temperature log correctly. Foods must be cooled from 135 degrees to 70 degrees within 2 hours, then 70 degrees to 41 degrees within 4 hours. The following are examples of the cooling log not being completed correctly: (11/7/18) Rice: initial cooling was not completed. The first temperature recorded was at 12:15 with a temperature of 80 degrees. Cooling ended at 2:20 with a temperature of 41 degrees. This is unacceptable since it is not clear what time the product reached 135 degrees. (11/19/18) Weiner Roll: initial cooling was recorded at 12:30 with a temperature of 130 degrees. Cooling ended at 2:00 with a temperature of 42 degrees. It is not clear what time the product reached 135 degrees.
- There were at least 10 days in November when the walk-in freezer was above 0 degrees without any documentation that corrective action was done. Temperatures reached up to 15 degrees.
- For the reach-in freezer, there was one day when the temperature reached 12 degrees – no corrective action was documented.

**Corrective Action:**

1. Retrain all food service staff on how to complete the food temperature log, cooling temperature log, and equipment temperature log.
2. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.

NOTE: This will be reviewed during SFSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.



# Hawaii Department of Education

## SNP Administrative Review Findings

DOE School Food Services Branch (1434-6)

### Program Year 2019

#### Wallace Rider Farrington High (106)

1106 Koko Head Avenue  
Honolulu, HI 96816-3710

Month of Review: October 2018

Date of Onsite Review: July 19, 2018

#### Commendations

\* Farrington High

Lunch looked appealing.  
Documents were organized.  
Kitchen was clean and orderly.  
Staff was attentive and quick to make corrections onsite.

\* Fiscal

Thank you for having the required fiscal documents ready and neatly organized  
The required 10-Bs were completed and signed

#### Technical Assistance

\* Food Safety Plan

Explained to the manager to maintain documentation that the food safety plan is reviewed annually. Food Service Manager signed the four SOPs that had not been signed in SY 17-18.

\* Menu

Reviewed the issues found with the menu documentation with SFBS Supervisors and Food Service Manager.

#### Other Federal Programs - Wallace Rider Farrington High (106)

1809. Site operating according to approved agreement?

**Finding 9244: SSO site is not operating in accordance with provisions of the approved agreement.**

Offer vs Serve was not selected on the school's site application for SSO for June.

**Corrective Action:**

The SFA corrected the site application during the on-site review.

1827. Meal documentation for last five days of review period indicate required meal components available? Enter data.



Program Year 2019

**Finding 9000: Meal Components and Quantities - Incorrect crediting**

The following menu items and components were credited incorrectly:

- Thursday, June 21: according to the Recipe Analysis Workbook, the cabbage in the Kalua Pork and Cabbage credits as 3/8 cup of other vegetable, not 1/2 cup. SFA stated they conducted a yield study to obtain a new factor.
- Monday, June 25: the shortbread cookie should be credited as 0.5 oz eq of grain. TA was provided that grain items must be credited towards the meal pattern if it provides at least 0.25 oz eq of grain.

**Corrective Action:**

1. Submit yield documentation for the cabbage.
  2. Submit a revised production record template to show that the shortbread cookie is being credited as 0.5 oz eq of grain.
- NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

1827. Meal documentation for last five days of review period indicate required meal components available? Enter data.

**Finding 9000: Meal Components and Quantities - Production Records and Recipes**

The following issues were noted with menus and production records:

- Tuesday, June 26, 2018:
  - o The production record states that a 10.5 oz portion of beef stew is served. It is unclear how a 10.5 oz portion was determined or served.
  - o The serving/portion size for the beef stew is not listed on the standardized recipe. The standardized recipe does not include the carrots, potatoes, celery and onion as ingredients.
  - o On the production record, the factor per 100 for the carrots and the celery in the beef stew are inaccurate.

The factor per 100 for the carrots should be 12.3 (cooked, drained vegetable), not 9.2 (raw, sliced vegetable). Based on this information, at least 19.1# of carrots would be needed to get 155 1/4 cup servings.

For the celery, it is unclear where the 7.20 per 100 factor was obtained for the celery in the beef stew (7.2 is the factor for ready to use celery sticks). The factor for the sliced, cooked vegetable is 12.4 per 100, and the factor for the diced, cooked vegetable is 11.5 per 100.

- Wednesday, June 27, 2018:
  - o For the Creole Macaroni, the beef is listed as "Ground Beef 80/20" on the production record. On the standardized recipe, the beef is listed as "Ground Beef, 15% fat". SFBSB confirmed that 80/20 ground beef is being used.
  - o The standardized recipe for the Creole Macaroni indicates a yield of 100 – 7.34 oz servings, but the production record indicates an 11.5 oz serving. It is unclear how an 11.5 oz serving was determined or served.
  - o On the production record, at least 13.18# of baby carrots would be needed to get 170 1/4 cup servings.
  - o For baby carrots, 1/8 cup listed in the column, "Per Svg Port" but 1/4 cup is listed for serving size.



***Program Year 2019***

**Corrective Action:**

For Beef Stew, complete the following:

1. Review the serving/portion size for the beef stew and make the necessary revisions to the production record template and/or standardized recipe. Include the serving utensil.
2. Revise the beef stew recipe to include the portion size and the correct weights/measures for the carrots, potatoes, celery and onion.
3. Revise the production record template to include the correct factor for the carrots and the celery.
4. Submit the revised production record template and recipe to show all of the above have been corrected.

For Creole Macaroni, complete the following:

1. Revise the production record template to match the standardized recipe for Creole Macaroni to consistently document "Ground Beef 80/20" is being used.
2. Revise the production record template to include the correct amount for "Per Svg Port" for the baby carrots and the correct amount needed for the serving size listed.
3. Review the portion size for the Creole macaroni and make the necessary revisions to the production record template and/or standardized recipe. Include the serving utensil.
4. Submit the revised production record template and recipe to show all of the above have been corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.

*1837. School site – most recent food safety inspection posted, visible to public?*

**Finding 9000: Food Safety - Reusing food containers to store ingredients**

The school is reusing mayonnaise containers to store ingredients such as sugar, salt, and yeast. According to the Department of Health, plastic containers such as those used for mayonnaise, are considered "single-use articles" and are designed and constructed to be used once and discarded.

**Corrective Action:**

1. Describe how this issue was corrected.

NOTE: This will be reviewed during SFBSB's next Administrative Review to ensure corrective actions have been implemented SFA-wide.