

SNP Administrative Review Findings *Program Year 2020*

Voyager A PCS (1422-2) 2428 Wilder Avenue Honolulu, HI 96822

No. of Sites / Reviewed: 1 / 1 Month of Review: November 2019 Dates of Review: January 16-17, 2020 Exit Conference Date: January 17, 2020 Due Date for Corrective Action: June 10, 2025

Commendations

* Summary: Documentation

Requested documentation was submitted in a timely manner.

* Certification and Benefit Issuance: AR Documentation

Documents were organized and prepared upon the reviewers' arrival.

* Certification and Benefit Issuance: AROT & MDOT

Thank you for utilizing the AROT and MDOT binder to help organize all documents.

* Certification and Benefit Issuance: AR Documentation Organization

Binder with applications was extremely well organized - this made conducting that aspect of the review much simpler

* Certification and Benefit Issuance: Day of Review Meal Service

Meal service ran smoothly and expeditiously.

Technical Assistance

* Summary: Professional Standards Training Hours

Training hours must be counted for the school year in which they were completed, unless an excess amount of training hours were completed. If an employee exceeded training hours for the school year, the excess training hours may be counted towards the following school year.

* Certification and Benefit Issuance: POS Location Exception

The school requires an exception for the POS meal counting location (noted by the SFA on the application), because students are checked off on the meal counting sheet as they enter the dining area, but before they take the meal. The office clerk was reminded that the meal counter, including any substitute meal counters, must verify that each student took a reimbursable meal if the meal is being counted for reimbursement.

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Suggestions

* Summary: eTrition & Error Prone Applications

Consider checking to see if eTrition will 'flag' error prone applications – this will help ensure all error prone applications are appropriately designated for the verification period.

* Sponsor: Training Log

Suggest using HCNP's training log to document professional standards requirements to ensure sure that documentation is thorough. Please include training topic codes in the training log. Training topic codes are available at https://fns-prod.azureedge.net/sites/default/files/cn/ps_trainingtopics.pdf.

Certification and Benefit Issuance - Voyager A PCS (1422-2)

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

Finding 9000: Other Finding

To backdate free and reduced applications, the SFA must receive approval from the State Agency, and this practice must be implemented for all students.

Corrective Action:

1. Reach out to the State Agency to receive approval on the process of back dating free and reduced applications.

2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

NOTE: This will be reviewed during the 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.

Technical Assistance:

A student was entered at paid status upon enrollment in October 2019. The student's eligibility status was changed from paid to free on 11/6/19, then backdated to the student's enrolled date. Although this is allowed, the SFA must notify HCNP if it chooses to exercise this ability. Also, this flexibility must be done consistently for all children.

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

Finding 9021: Denial of benefits notification to household not consistent with FNS requirements.

One denied application listed 3 names, however household size was listed as 5. Household would have been denied either way, however household should have been contacted to determine actual size.

When determining eligibility, the SFA may not approve applications that are inconsistent or unclear. The total number of households on the application must match the number of household members indicated in the box.

Corrective Action:

1. Create a standard operating procedure (SOP) on how applications must be reviewed and approved.

2. Train all appropriate staff who review and approve meal applications that the number of household members must match the number of names listed on the application.

3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with



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appropriate staff.

4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Verification - Voyager A PCS (1422-2)

206. On-site observation validate Off-Site Assessment Tool responses to Verification questions?

Finding 9006: Verification information on the Off-site Assessment Tool not validated, or deficiencies found.

For the application that was verified for cause, the 'Results of Verification' letter was not kept on file. For the other application that was verified, 'Notification of Selection for Verification' letter was not kept on file. Verification documentation must be kept on file.

Corrective Action:

1. Create a standard operating procedure (SOP) on how verification letters and all supporting documentation must be kepton file.

2. Train all appropriate staff who verify applications that all documents must be kept on file.

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

4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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209. Review of verified applications – properly selected, replaced applications correctly, verified correctly?

Finding 9039: Applications not properly selected for verification.

The applications selected for verification were not appropriately selected for the sample size option used. One application was error prone but was not designated as such.

During the review, the verification sample size requirement was discussed with the SFA. The SFA may choose the correct application for verification.

Corrective Action:

1. Review the Eligibility Manual for School Meals.

2. Train all appropriate staff who verify applications.

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

4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Finding 9008: Civil Rights information on the Off-site Assessment Tool not validated, or deficiencies found.

The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement. Plus, the statement cannot be smaller than the smallest font on the document.

Corrective Action:

1. Revise any documents that have the outdated nondiscrimination statement and make sure the font size matches the smallest font on the document.

2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.

Potential stakeholders have not been made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy.

Corrective Action:

1. Create a process of how potential stakeholders will be made aware to participate in the development, review, update, and implementation of the Local School Wellness Policy.

2. Make potential stakeholders aware of the ability to be able to participate in the development review, update, and implement of the Local School Wellness Policy.

3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Finding 9000: Other Finding

The LEA did not provide documentation to substantiate hiring requirements. The new director(s) hired on or after July 1, 2015 did not meet the hiring standard requirements because documentation was not provided.

Corrective Action:

1. The LEA must ensure that any new director hired on or after July 1, 2015 meets the new Professional Standards.

2. Keep on file all hiring documentation to support new directors.

3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1213. Validate OFS #1203 - Did new Director meet food safety certification and training requirements?

Finding 9000: Other Finding



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Hawaii Child Nutrition Programs

The new school Nutrition Program Director did not complete food safety training within 30 days of being hired, and no previous food safety certification was obtained in the last 5 years.

Corrective Action:

1. The School Nutrition Program Director must complete food safety training.

2. Keep training documentation (certificate) to confirm that training was completed.

3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Finding 9000: Other Finding

The staff did not meet the required training hours for the school year 2018-2019. The Principal/School Nutrition Director is the only employee to meet the required training hours for the current school year.

The Principal / School Nutrition Director submitted documentation to show that staff will be instructed to complete the required training hours by Spring Break for the school year 2019-2020.

Corrective Action:

1. Annually, the full-time staff must complete a minimum of 6 hours of training relevant to their role and responsibilities, and part-time staff must complete a minimum of 4 hours of training that is relevant to their role and responsibilities

2. Maintain documentation on file to verify the completion of the required hours of training. This documentation may include certificates, sign-in sheets, and other relevant records.

3. Track all training hours and information in the SFA's training log to ensure accurate and complete records.

4. Documentation of professional standards training should be kept for 3 years plus the current school year, or 6 years plus the current year, if required to follow the Hawaii State Department of Education requirement. Records that list the employee name, employer/school, training title, topic/objectives, training source, dates, and total training hours would be appropriate to show compliance with professional standards training requirements.

5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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SNP Administrative Review Findings *Program Year 2020*

Voyager A (541-PCS) 2428 Wilder Avenue Honolulu, HI 96822

Month of Review: November 2019 Date of Onsite Review: January 16, 2020

Suggestions

* Meal Counting & Claiming Question: 325.: Meal Counting Procedures

Highly recommend that the SFA implement procedures to ensure that meal counts are entered accurately and on the same day as the meal service. Suggest either entering meal counts into the computer at the POS, or training back-up staff to enter meal counts on the same day (if the regular meal counter is absent).

Meal Counting & Claiming - Voyager A (541-PCS)

325. Review Period meal counts by category correctly used in the claim? Enter data.

Finding 9000: Other Finding

The School Food Authority (SFA) has claimed meals in error. The counts by paid category were not correctly submitted for lunch reimbursement for the month of review. Meal counts are not consistent between the manual meal counting sheet and the electronic POS.

Meal counts are not consistent between the manual meal counting sheet and the electronic POS, and this resulted in fiscal action.

- On 11/4/19, a student was entered into the POS as receiving a meal, but was not counted on the meal countingsheet.
- On 11/6/19, 6 students were entered into the POS as receiving a meal, but were not counted on the meal counting sheet.
- On 11/7/19, a teacher was marked as receiving a meal on the meal counting sheet, but was not entered into the POS.
- On 11/12/19, 3 students were marked as receiving a meal on the meal counting sheet, but were not entered into the POS.
- On 11/13/19, 2 teachers were marked as receiving a meal on the meal counting sheet, but were not entered into the POS.
- On 11/15/19, a teacher was entered into the POS as receiving a meal, but was not counted on the meal counting sheet.

On some occasions, meal counting documentation is insufficient. This could lead to errors in data entry.

• On 11/6/19, a post-it note that appears to contain student attendance and meal counting information was affixed to the meal counting sheet. It was not indicated on the post-it note whether or not these students took a meal.

• On 11/18/19 and 11/19/19, a different sheet (not the regular meal counting sheet) was provided for the meal counts. The sheet does not indicate the date the meals were served and the students' full last names. Ensure that meal counting sheets include the date the meal was served and the students' full names.

Enter the highest number of eligible students in the Eligibility Information section of the claim for reimbursement. For the month of review, free eligible students were entered as 55 (should have been 57), and paid eligible students were entered as 217 (should have been 216).

Corrective Action:

1. To correct this finding, submit a detailed explanation of the new/revised process that will be implemented to ensure an accurate meal counting and claiming system include the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.

2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

NOTE: This will be reviewed during the next Administrative Review to ensure corrective actions have been implemented by

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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 - Voyager A (541-PCS)

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

Finding 9000: Other Finding

On the day of review, the production record was not correctly completed. Corn was listed twice on the production record. 1/8 cup serving credits as 1/8 cup of vegetable (not 1/4 cup). Based on visual observation during meal service, the minimum daily vegetable requirement was met.

Corrective Action:

1. Provide training for all staff responsible for completing daily production records, ensuring they understand the process and record information accurately.

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

3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

NOTE: This will be reviewed during the 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.

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

Finding 9000: Other Finding

All required fields on the production records were not correctly documented during the review period.

Monday, 11/18/19: Beef & Vegetable Curry w/Chicken Katsu is listed on the menu; however, chicken katsu is not listed on the production record. The vendor clarified that the vegetable croquette was served instead of the chicken katsu. The following information was incorrect on the menu planning template: the romaine lettuce credits as 1/8 cup (not ¼ cup). Cucumbers (1/8 cup) and onions (1/8 cup) are not listed.

Tuesday 11/19/19: crediting for the lettuce is incorrect on the production record. $\frac{3}{4}$ cup serving of lettuce credits as 3/8 cup dark green vegetable (not $\frac{3}{4}$ cup). Broccoli is listed on the menu planning template, but was not served on this day (not listed on the production record). Romaine lettuce (3/8 cup), tomatoes (1/8 cup), and cucumbers (1/8 cup) are not listed on the menu planning template. On the menu planning template, crediting for the corn is incorrect (should be 1/8 cup, not $\frac{1}{2}$ cup).

Wednesday, 11/20/19: On the production record, crediting for the hamburger patty, oven fries, and hamburger buns is incorrect. One 4-oz hamburger patty credits as 2.75 oz eq M/MA (not 2 oz eq). ½ cup of oven fries credits as ½ cup starchy vegetable (not ¼ cup). One hamburger bun credits as 2.25 oz eq grain (not 2 oz eq). Information on the recipe is not consistent with the production record. For example:

• Romaine lettuce: recipe shows 15 lbs is needed for 50 servings; production record shows 6.2 lbs is needed for $97 - \frac{1}{2}$ cup servings.

• Sliced tomatoes: recipe shows 7 lbs is needed for 50 servings; production record shows 6 lbs is needed for 97 – 1/8 cup servings.

• Sliced onions: recipe shows 3.25# to get 50 servings; production record shows 4 lbs is needed for 97 – 1/8 cup servings.

• Oven baked fries: recipe shows 7 lbs is needed for 50 servings; production record shows 15 lbs is needed for 97 – ½ cup servings.

The following information was incorrect on the menu planning template:

- Hamburger bun: credits as 2.25 oz eq grain (not 2 oz eq)
- Edamame: credits as 1/8 cup vegetable



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Oven fries is missing

Thursday, 11/21/19: information on the menu planning template is not consistent with the production record. For example: • Lettuce: listed on the menu planning template but not on the production record.

• Corn: menu planning template shows 1/8 cup, but production record shows that 1/4 cup was served.

• Hapa rice: menu planning template shows that 1.5 oz was served, but production record shows that 2 oz was served.

Friday, 11/22/19: the menu planning template shows that 5/8 cup of apples were served, but the production record shows that $\frac{1}{2}$ cup was served. Unable to determine crediting for the brownie. HCNP requested that the vendor provide more information via email on $\frac{1}{10}/20$.

Corrective Action:

1. Provide training for all staff responsible for completing daily production records, ensuring they understand the process and record information accurately.

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

3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable.

In school year 2019-2020, 100% of grains had to be whole grain-rich. For school year 2024-2025, at least 80% of grains offered must be whole grain-rich to meet requirements. The menu met 75.7% whole grains for the week of review for grades K-8.

Corrective Action:

1. Update menus to come into compliance.

2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Failure to complete corrective action or request an extension by the due date may result in claim payment being withheld until corrective action is complete and approved.