



SNP Administrative Review Findings

Bobby Benson Center (1418-4)

Program Year 2022

Bobby Benson Center (1418-4)

56-660 Kamehameha Hwy
Kahuku, HI 96731

No. of Sites / Reviewed: 1 / 1

Month of Review: May 2022

Dates of Review: June 21-27, 2022

Exit Conference Date: June 27, 2022

Due Date for Corrective Action: **August 21, 2025**

Commendations

* Sponsor: Thank you!

We appreciate Bobby Benson Center adjusting to the virtual format of the Administrative Review this year by recording meal preparation and service and for using Dropbox to upload documentation.

* Sponsor: Menu Substitutions

Food service manager is doing a good job documenting menu substitutions on production records.

Technical Assistance

* Meal Counting & Claiming: Field Trips

Explained how to do meal counting on field trips. If meals are served when students are on a field trip, meal counting must be completed at the point of service (when the client receives a reimbursable meal). A meal counting sheet must be provided to staff on the field trip to document the clients that received a reimbursable meal. For the clients who stay at the SFA and do not go on the field trip, meal counting would be done the same way as when all of the clients are served at the SFA. The meal counts for the clients who went on the field trip and for the clients who remained at the SFA will need to be totaled together to determine the total meal count to claim for reimbursement. SFA must make sure that the staff who do meal counting on field trips are trained on meal counting.

* General Program Compliance: Non-discrimination Statement

Nondiscrimination statement - provided SFA with the current statement that USDA released in May 2022. Remember to update all program materials and website that contain the old nondiscrimination statement.

* Resource Management Question: 700.: Expense categories

Looking at the SFA provided file labeled FY21 8130 by class and date:

It appears that all food transactions are categorized under 8130 Client Expenses Client Food. It looks like some of the transactions are sub-categorized to NSLP and the remaining non-program food costs (like McDonalds, L&L) are under RES TRT. This is good to see, but HCNP strongly recommends that a separate class be created for the child nutrition program. This class would only include the revenue from the HCNP reimbursement check and only allowable child nutrition food costs. Purchases would need to be separated for the food service program and non-program food cost. This was previously mentioned during the SY 16-17 Administrative Review too.

* Sponsor: After School Snack Program

On 5/1/22, cereal was served for both breakfast and snack. Suggest switching the snack with another day so cereal is not served for two meals on the same day.

On 5/6/22, peanuts with sea salt was served. May want to consider serving a low sodium product.

Suggested other crackers that the SFA may be able to offer if unable to find animal crackers – soda crackers, club crackers,



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goldfish crackers. Emphasized the SFA must check the ingredients to make sure the product is whole grain or enriched. If not sure, ask their Registered Dietitian or HCNP.

General Program Compliance - Bobby Benson Center (1418-4)

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

Finding 9000: Other Finding

Civil Rights Complaint Logs were not submitted.

Corrective Action:

1. Create and implement a Complaint Log for each school year.
2. Maintain on file the Complaint Log.
3. Annually review and update the Complaint Log.
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 9000: Other Finding

Civil Rights training documentation was submitted for two staff only. No other training documentation was submitted to demonstrate all appropriate staff were trained on Civil Rights in school year 2021-2022. All appropriate staff must be trained in Civil Rights annually. Training documentation must be maintained.

Corrective Action:

1. Maintain on file the agenda/list of topics covered during the Civil Rights training to demonstrate that staff were trained on topics related to the meals program. Include the number of hours it took to complete the training and sign in sheets for all staff.
2. Create a standard operating procedure (SOP) on how the SFA will ensure all appropriate staff are trained on the required Civil Rights topics. Include the training topics, documentation of staff training, and documentation of hours for training.
3. Train all appropriate staff on the SOP.
4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. 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 9000: Other Finding

Racial/ethnic data was not completed by the deadline. Racial/ethnic data must be collected for everybody who has access to the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Corrective Action:

1. Collect racial/ethnic data on all students with access to NSLP and SBP

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2. Complete the Civil Rights Ethnic Data Report annually by October 31.
3. Maintain on file the racial/ethnic data.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

Civil Rights Ethnic Data Report - enrollment, ethnic and racial data entered on the form is for the day that the form is completed, not the whole year.

808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?**Finding 9000: Other Finding**

The SFA does not accommodate meal pattern changes that a medical provider has determined to be a disability and/or the Meal Modification Request Form has not been completed by the medical authority for meal modifications outside of the meal pattern.

Corrective Action:

1. Maintain on file complete medical statements.
2. Create a standard operating procedure (SOP) on how the SFA will ensure all medical statements are reviewed by the SFA, signed by the SFA, and are completed fully.
3. Train all appropriate staff on the SOP.
4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

Meal accommodations: explained that once the SFA is aware a meal modification is needed, document the initial notification and the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible.

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.**

All School Food Authorities (SFA) must maintain a current and compliant Local School Wellness Policy. During the Administrative Review, it was determined that the most recent policy on file is not posted on the SFA's website.

Corrective Action:

1. The 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 most recent policy is made available to the public.
2. Post the most recent Local School Wellness Policy to the SFA's website.
3. Keep documentation on file to show the public requirement was met.
4. 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**

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.

At least 8 hours of food safety training is required either not more than 5 years prior to Nutrition Program Director's hire date or within 30 days of Director's hire date.

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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1400. Food safety plan – contain required elements, copy available at each school?**Finding 9142: The written food safety plan does not contain all the required elements.**

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements: Standard Operating Procedures

Corrective Action:

1. Create Standard Operating Procedures (SOPs) and add them to the food safety plan.
2. Sign and date the SOPs annually to show an annual review was completed.
3. Train all appropriate staff on the SOPs.
4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1501. Records retained for 3 years?**Finding 9000: Other Finding**

Records were not retained for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.

Corrective Action:



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1. Maintain on file all records applicable to the school nutrition program.
2. Create a standard operating procedure (SOP) on how the SFA will ensure that all documentation will be kept on file and that the documents will be kept for at least three years plus the current year, including the names and titles of the individuals that will ensure compliance.
3. Train all appropriate staff.
4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Finding 9000: Other Finding

Seamless Summer Option (SSO) waivers that Bobby Benson Center was approved to use were for SY 21-22 only. Beginning SY 22-23, SSO is not an option to operate for the entire school year. Bobby Benson Center's website had inaccurate information under the National School Lunch Program section.

Corrective Action:

1. Update the school's website to accurately reflect the operation for the school year.
2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Month of Review: May 2022

Date of Onsite Review: June 14, 2022

Technical Assistance

- * General Program Compliance Question: 901.: On-site Monitoring

The monitoring forms for breakfast and lunch were not signed or dated. Remember the meal clerk and reviewer must sign and date the form.

- * Meal Components & Quantities: Milk

Since the milk is poured from the gallon and half gallon container into cups, draw a line on the cup with a marker to identify how much to pour to ensure 1 cup of milk is provided. Use that cup as a sample that all food service staff can use at each meal service to know how much milk to pour. Check that all food service staff are pouring enough milk into the cups.

- * Meal Components & Quantities: Fruit

Fresh fruit measurements: document (write down) what was done when measuring the fresh fruit (apple, orange, pear, banana), including the date it was done. Maintain the documentation.

- * General Program Compliance: Temperatures

Food temperatures: document the actual time the temperatures are taken. The same time is listed for all menu items for the meal (on the production records and the temperature logs for hot holding and cold holding).

Meal Counting & Claiming - Bobby Benson Center (900-RCC)

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

Finding 9066: Inaccurate meal counts by eligibility category at the POS.

Meal counting must be done at the point of service (after each resident receives a reimbursable meal). During meal observation of breakfast, meal counting was done correctly for two residents but not for the other residents. At lunch, meal counting was not done at the point of service. It is not acceptable to serve several meals and then document the meal counting at one time. It was observed that the food service manager is serving the meals and trying to do the meal counting at the same time. This issue must be corrected. Have another staff member(s) who is trained in meal counting and recognizing reimbursable meals assist by doing the meal counting during meal services.

Corrective Action:

1. Complete meal counting and claiming training.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
3. Create a standard operating procedure (SOP) on the SFA's meal counting procedures, detailing how meals will be counted correctly at the POS.
4. Train all appropriate staff on the SOP to ensure that meals are counted correctly at the POS.
5. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
6. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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.

On 5/31/22 for breakfast, a meal with both an X and a circle around 'Yes' was claimed for reimbursement. The SFA stated this represents a non-reimbursable meal. This breakfast will be disallowed. SFA must designate a second person to review the total meal counts daily before it is entered on the Edit Check Worksheet and claimed for reimbursement to ensure only reimbursable meals are claimed for reimbursement. This resulted in fiscal action.

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. Train all individuals who are responsible for meal counting.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm training was completed.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Meal Components & Quantities - Bobby Benson Center (900-RCC)

401. DOR - meals selected by students contain all required components/quantities? Enter data.

Finding 9000: Other Finding

During the lunch meal service on the day of review, it was observed that one meal was counted for reimbursement did not contain all of the required meal components. On the day of review, the resident did not receive milk. This is not a reimbursable meal and will result in fiscal action. This meal will be disallowed.

Corrective Action:

1. Submit written assurance that all meals counted as reimbursable will contain all necessary components.
2. Train all individuals who identify a reimbursable meal.
3. Submit 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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410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

Finding 9000: Other Finding

Condiments such as shoyu and ketchup were provided to a few residents upon request during observation of lunch service. One of the residents was handed 3 packets of shoyu and a bottle of ketchup. This is inconsistent with what the food service manager stated to the reviewer. The reviewer was told that condiments are portioned and are not available upon request. When condiments are provided, they must be documented on the production record. Shoyu and ketchup were not documented on the production record for 6/14/22. Both shoyu and ketchup are sources of sodium and SFAs must work toward lowering the sodium served in school meals. Effective July 1, 2023, SFAs must meet the Sodium Interim Target 1A



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(Grades 9-12 Lunch: =1,280 mg sodium). Document all condiments served (what was served and how much was served) on the production records for each meal service. Work with your dietitian on proper portions of the condiments to ensure the dietary specifications are met and not exceeded. One resident should not be given 3 packets of shoyu and ketchup at one meal service.

Corrective Action:

1. Update food production records to include condiments 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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410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

Finding 9000: Other Finding

The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on Wednesday, May 4, 2022, with only 1/2 cup offered.

A whole pear was served this day. According to the Food Buying Guide, 1 whole pear is 1/2 cup fruit.

Serve two pears or 1 cup canned pears to meet the meal pattern requirements.

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

Finding 9000: Other Finding

The whole grain-rich requirement was not met for the week of review. For breakfast, the menu offered 50% whole grains for the week of review for grades 9-12. In SY 2021-2022, the whole grain-rich requirement was all grains offered must be whole grain-rich. The current whole grain-rich requirement is at least 80% of grains offered weekly must be whole grain-rich.

The following products were not whole grain-rich.

Increase the amount of whole grain-rich products offered to at least 80% of the weekly grain offerings.

- Bagel
- Eggo Waffle

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

Finding 9000: Other Finding

The whole grain-rich requirement was not met for the week of review. For lunch, the menu offered 25% whole grains for the week of review for grades 9-12. In SY 2021-2022, the whole grain-rich requirement was all grains offered must be whole grain-rich. The current whole grain-rich requirement is at least 80% of grains offered weekly must be whole grain-rich.

The following products were not whole grain-rich. Increase the amount of whole grain-rich products offered to at least 80% of the weekly grain offerings.

- Bread – multiple labels were provided and there was no indication on which was served.
- Hapa Rice – A recipe was not provided. Therefore, the total brown rice served could not be determined.

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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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.

The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. This requirement was not met on Sunday, May 1, 2022, with only 1.25 oz. eq. offered, Tuesday, May 3, 2022 with 0 oz. eq. offered, and Saturday, May 7, 2022 with 1 oz. eq. offered.

The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 14 oz. eq. was not met for grades 9-12. The menu offered a minimum of 12 oz. eq. of meat/meat alternate throughout the week.

Sunday, 5/1/22: The stir-fry recipe was followed and the total pork offered in the recipe, per serving, is only 1.25 oz. eq.

A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the Kalua pork served on Tuesday, May 3, 2022 and sliced deli turkey served on Saturday, May 7, 2022. Therefore, meal pattern crediting could not be determined as met. Choose a product with either a CN Label or PFS in order to determine meal pattern crediting. The string cheese provided 1 oz. eq. meat/meat alternates on Saturday, 5/7/22.

Consider the following suggestions to meet the requirements:

- Review the recipe for Pork Stir Fry and adjust the yield so that each portion is at least 2 oz. eq. Per the Food Buying Guide, each lb of pork shoulder only provides 0.43 oz. eq. meat/meat alternates per serving. In order to provide 2 oz. eq. meat/meat alternates per serving, at least 4.65 oz. pork need to be used per serving.
- Check all manufacturer's labels and CN labels to ensure that the daily and weekly meat/meat alternate requirements are met.
- Secure and serve pre-made menu items that have a Child Nutrition (CN) Label.

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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Technical Assistance:

The products listed on production records did not always match the label and/or portion that was actually served.

- The production records stated that Fat Free Chocolate milk was offered daily. The label provided was for 1% chocolate milk.

Production records with planned numbers for each item should be accessible before each meal service. Served numbers and leftover numbers need to be recorded at the end of meal service to ensure accuracy.

- Serving sizes documented were not always clear and complete. The portion size for the Kalua pork was 3oz, served with tongs. Menu items with a weight portion size (ounces) should be weighed on a scale prior to serving to ensure the proper amount is served to meet the meal pattern requirements.
- The products listed on production records did not always match the label and/or portion that was actually served. The production records and menu stated carrot sticks. Baby carrots were served.

General Program Compliance - Bobby Benson Center (900-RCC)**1405. Food safety inspection dates?****Finding 9146: Less than 2 food safety inspections were done in the current school year and no documentation that 2 inspections have been requested.**

School Food Authorities (SFAs) are required to ensure that each participating school receives at least two food safety inspections each school year. The SFA has not received two inspections during the current year and did not receive two inspections during the previous year. The SFA did not request two food inspections from the local health department. If two inspections are not received, the SFA must request to have two inspections completed and must maintain documentation of the request to be in compliance.

Corrective Action:

1. Request two food inspections from the local health department annually.
2. Keep documentation on file that two food inspections were requested from the local health department.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1406. Most recent Food safety inspection posted, visible to public?**Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.**

The SFA did not post the most recent food safety inspection. SFAs are required to post the most recent food safety inspection in a publicly visible location.

Corrective Action:

1. Post the most recent food safety inspection.
2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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.

The proper HACCP principles were not observed: Insufficient hand washing; Insufficient use of gloves; Improper use of washing fresh produce

Corrective Action:

1. Review and train on the Standard Operating Procedures for handwashing, glove use, and cleaning produce from the SFA's food safety plan.
2. Train all individuals who work in the cafeteria.
3. Keep training documentation (sign-in sheet, date of training, agenda) on file 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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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.