



SNP Administrative Review Findings

Ka Waihona o ka Na'auao PCS (1433-8)

Program Year 2023

Ka Waihona o ka Na'auao PCS (1433-8)

89-195 Farrington Hwy
Wa'ianae, HI 96792-4102

No. of Sites / Reviewed: 1 / 1

Month of Review: January 2023

Dates of Review: February 13-17, 2023

Exit Conference Date: February 17, 2023

Due Date for Corrective Action: July 3, 2025

Commendations

* Sponsor: Live Streaming

The SFA did a great job with live streaming during meal service! We appreciate the SFA having two cameras during lunch service to show the plating of meals and the point of service at the same time.

* Sponsor: Helpful Staff

SFA staff and Sodexo staff were helpful throughout the AR by providing responses and requested documentation in a timely manner.

Technical Assistance

* Sponsor: Attendance Factor

Enter the Attendance Factor from the most recent October Survey on the Edit Check Worksheet so the attendance adjusted eligibles can be calculated. The most recent Attendance Factor must be used on the Edit Check Worksheets from October-September.

* Sponsor: Civil Rights Ethnic Data Report Form O-4c

Racial Group section – the numbers do not need to total the number of enrolled students since students can indicate that they are more than one race (example, a student can say that they are Asian, White, and Native Hawaiian/Other Pacific Islander).

* Sponsor: Meal Modifications

Document meals provided to students who require a meal modification on the production record. For example, on 1/10/23, ham sandwich was prepared for the students who could not eat the chicken alfredo but this was not documented on the production record.

Suggestions

* Sponsor: Oranges

During the observation of lunch meal service, oranges were served whole. Suggest observing whether or not the students are eating the oranges the next time oranges are served. It may be difficult for the younger children to peel the orange. If the students are not eating the oranges, the school should check with the Department of Health if Ka Waihona is allowed to cut produce in their kitchen. If Ka Waihona is allowed, suggest Ka Waihona cuts the oranges into wedges so it is easier for the children to eat.

General Program Compliance - Ka Waihona o ka Na'auao PCS (1433-8)

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

Finding 9000: Other Finding

The Civil Rights complaint form used by the SFA is outdated and does not reflect the current USDA requirements. The SFA must maintain and use the most current version of the complaint form, which must include the updated non-discrimination statement.



SNP Administrative Review Findings

Ka Waihona o ka Na'auao PCS (1433-8)

Program Year 2023

Corrective Action:

1. Create and implement the most recent Civil Rights Complaint Form, ensuring it includes the updated non-discrimination statement. HCNP has a complaint form available on HCNP's website for SFAs to utilize.
2. Annually review and update the Civil Rights Complaint Form to ensure compliance with USDA regulations.
3. Maintain the Civil Rights Complaint Form on file, documenting all complaints received and actions taken.
4. 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.

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

Finding 9000: Other Finding

The medical statements on file were incomplete. The person responsible for reviewing these medical statements must follow up on any incomplete or unclear information to ensure all required details are fully provided before accepting the statements.

Corrective Action:

1. Maintain complete medical statements on file, ensuring all required information is provided and reviewed.
2. Create a Standard Operating Procedure (SOP) that outlines how the SFA will ensure all medical statements are thoroughly reviewed, signed by the SFA, and fully completed.
3. Train all appropriate staff on the SOP to ensure proper handling of medical statements.
4. Keep training documentation (such as sign-in sheets, date of training, agenda) on file to confirm that training was conducted with the appropriate personnel.
5. 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.

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

Finding 9000: Other Finding

The SFA published a public release for the current school year as required; however, documentation was not retained identifying the specific media outlets to which the release was sent. Additionally, the public release did not include the required USDA non-discrimination statement.

Per 7 CFR 245.5(a)(2), the public release must be provided to the local news media, the unemployment office, and any major employers contemplating large layoffs in the school's attendance area. It must also include the full USDA non-discrimination statement. The SFA is required to maintain documentation verifying that the public release was properly distributed and/or published.

Corrective Action:

1. Develop and distribute the required public release to appropriate entities, such as local news media, the unemployment office, and any major employers in the school's attendance area that may be considering significant layoffs.
2. Maintain documentation on file verifying that the public release was distributed and/or published, including the date and recipients.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.



SNP Administrative Review Findings Program Year 2023

Ka Waihona o ka Na'auao PCS (1433-8)

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.

810. Non-discrimination on appropriate Program materials?

Finding 9000: Other Finding

The non-discrimination statement on the breakfast flyer was incorrect. The most current USDA non-discrimination statement must be used on all program materials to ensure compliance with USDA regulations.

Corrective Action:

1. Review and revise all documents to ensure they contain the current, complete USDA nondiscrimination statement. Replace any materials that include outdated or incomplete versions.
2. Maintain documentation on file confirming that all relevant materials have been updated with the correct nondiscrimination statement, including the date of revision and a list of revised documents.
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.

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

Finding 9000: Other Finding

The SFA's wellness policy does not permit participation by the general public. At a minimum, the SFA must allow participation from the general public and the school community, which includes parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators. This participation is required during the development, review, update, and implementation of the Local School Wellness Policy.

Corrective Action:

1. Create a process to ensure the general public is informed about their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy.
2. Make the general public aware of their opportunity to participate in the wellness policy process.
3. Maintain documentation on file confirming that the general public has been made aware of their ability to participate.
4. 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.

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

Finding 9000: Other Finding

The Nutrition Program Manager did not meet the professional standards training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.



SNP Administrative Review Findings

Ka Waihona o ka Na'auao PCS (1433-8)

Program Year 2023

Nutrition Program Managers are required to complete a minimum of 10 training hours per year. Training may be obtained in person, online, through local meetings, webinars, conferences, etc. Managers hired on or after January 1 must meet a minimum of one-half the training requirement.

Corrective Action:

1. Annually, the manager must complete a minimum of 10 hours of training relevant to their role and responsibilities.
2. Maintain documentation on file to verify the completion of the required 10 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 must 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, hiring date, Professional Standards job category, 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.

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.

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

Finding 9000: Other Finding

Upon review of the Summer Food Service Program (SFSP), it was found that the SFA is not informing eligible families regarding the availability and location of free meals for students via the Summer Food Service Program.

Corrective Action:

1. Create a standard operating procedure (SOP) on how the SFA will inform households regarding the availability and location of free meals for students via the Summer Food Service Program.
2. Train all appropriate staff on the SOP.
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.

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.

IX Special Provision Options - Ka Waihona o ka Na'auao PCS (1433-8)

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

Finding 9000: Other Finding

For the number of identified students for SY 22-23, the SFA double counted students on the McKinney Vento List who were already on the SFA's direct certification list. Therefore, the SFA's CEP Identified Student Percentage (ISP) is lower than what was originally reported by the SFA which results in a lower free claiming percentage and a higher paid claiming percentage.

On the SFA's CEP Data Collection Form for SY 2022-2023, the SFA listed 27 students in #9. Number of students at the school who are NOT on the DC list, but who also meet the definition of an Identified Student. 16 of the 27 students on the McKinney Vento list were listed on the SFA's direct certification list. Also, one student could not be found on the school's 4/14/22 enrollment list. The school stated that the student was enrolled at the school until 1/4/22.



SNP Administrative Review Findings

Ka Waihona o ka Na'auao PCS (1433-8)

Program Year 2023

Therefore, the SFA has a total of 280 identified students, not 297. The Identified Student Percentage is 48.44%, not 51.38%. This results in a decreased free claiming percentage of 77.50% (not 82.21%) and an increased paid claiming percentage of 22.5% (not 17.79%). Fiscal action will be taken for all months the incorrect ISP was used.

Corrective Action:

1. Per USDA Western Region's guidance, HCNP will validate Identified Student Percentages at the time of CEP election by an SFA or school.
2. Each year, appropriate SFA staff will complete HCNP's CEP training prior to completing the CEP Data Collection Form.
3. Complete the CEP Data Collection Form accurately on an annual basis.
4. Maintain all documentation that supports the data entered on the CEP Data Collection Form.
5. Meet all HCNP deadlines for completing the CEP training and the submission of the CEP Data Collection Form and all supporting documentation, upon request.
6. 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.



SNP Administrative Review Findings

Ka Waihona o ka Na'auao PCS (1433-8)

Program Year 2023

Ka Waihona o ka Na'auao (545-PCS)

89-195 Farrington Hwy
Wa'ianae, HI 96792-4102

Month of Review: January 2023

Date of Onsite Review: February 13, 2023

Meal Components & Quantities - Ka Waihona o ka Na'auao (545-PCS)

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

Finding 9000: Other Finding

The Production Records and Transport Daily Records are inconsistently completed. Specifically, required sections such as milk counts, number of meals served, and time and temperature recordings for hot and cold food items are often incomplete or missing. Accurate and complete documentation is required to ensure food safety and compliance with USDA requirements.

Corrective Action:

1. Train all appropriate staff on how to complete the Food Production Records and Transport Daily Records to ensure all required fields—milk, number of meals served, and time/temperature of food items—are consistently completed.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
3. Maintain accurate and complete records for both food production and daily transport as required.
4. 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.

General Program Compliance - Ka Waihona o ka Na'auao (545-PCS)

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

Finding 9000: Other Finding

The required on-site monitoring form was not fully completed prior to February 1 of the current school year for all points of service. Additionally, several sections of the form for both breakfast and lunch monitoring were left incomplete, which does not meet USDA compliance requirements for meal counting and claiming oversight.

Corrective Action:

1. Ensure that all required on-site monitoring of meal counting and claiming procedures is fully completed prior to February 1 each school year for all points of service by completing all sections and questions of the on-site monitoring form.
2. Maintain complete documentation of all on-site monitoring conducted, including dates, findings, and corrective actions taken.
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.

SNP Administrative Review Findings
Program Year 2023**Ka Waihona o ka Na'auao PCS (1433-8)***1407. SFA written food safety plan implemented?***Finding 9000: Other Finding**

HACCP principles were not properly followed due to improper food storage practices. Specifically, corn on the cob was observed stored in the walk-in cooler loosely covered with a bag, which poses a risk of contamination. All food items must be completely and securely covered to maintain food safety and prevent contamination, as required by HACCP protocols.

Whole oranges were served. The staff at Ka Waihona explained that they wash the oranges before the meal service. It was observed that the oranges were being served out of the original boxes in which the oranges were delivered. Explained to the SFA that after they wash the oranges, they must store the oranges in a container/pan, not in the original box.

Corrective Action:

1. Review the storage standard operating procedure (SOP) within the SFA's Food Safety Plan.
2. Train all appropriate staff on the SOP.
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.

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.

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.