



SNP Administrative Review Findings

Kamalani Academy PCS (1444-3)

Program Year 2022

Kamalani Academy PCS (1444-3)

1403 California Ave
Wahiawa, HI 96786

No. of Sites / Reviewed: 1 / 1

Month of Review: March 2022

Dates of Review: April 19 – 25, 2022

Exit Conference Date: April 25, 2022

Due Date for Corrective Action: June 4, 2025

Commendations

- * Sponsor: Kamalani Academy Commendations

Kamalani Academy staff were friendly and accommodating in providing additional information and in answering questions about their meal service operation. SFA submitted documents in an organized manner.

We appreciate your flexibility during HCNP's virtual Administrative Review, recording meal service operations, and submitting the numerous documents via drop box links.

Technical Assistance

- * Sponsor: TA provided to Kamalani Academy
 - Verification: Discuss verification process and the importance of using the actual income amount and payroll frequency for free and reduced priced meal eligibility.
 - Nondiscrimination Statement: Availability of the two versions of the Nondiscrimination Statement (9/2020) posted on the HCNP website. A print format (for printed documents) and web based format (if it is used on websites where the person can click on the links):
 - Print format: <https://hcnp.hawaii.gov/wp-content/uploads/2020/12/Civil-Rights-Nondiscrimination-Statement-PRINT-FORMAT-9.2020-1-3.docx>
 - Web based format: <https://hcnp.hawaii.gov/wp-content/uploads/2020/12/Civil-Rights-Nondiscrimination-Statement-WEB-BASED-FORMAT-9.2020-1-1.docx>
 - Complaint Form: Refer to the revised Complaint form (3/2022) found at the HCNP website: <https://hcnp.hawaii.gov/wp-content/uploads/2022/03/HCNP-Discrimination-Complaint-Form-3.2022.pdf>
 - Food Safety:
 - SFA's food safety plan is to be reviewed annually before the start of the school year and revised as needed. Conduct annual training on the SFA's food safety plan to appropriate staff.
 - Reheating food: Discussed with staff that reheating food to proper temperature must be done within two hours.
 - Taking temperature: Discussed with SFA staff the proper method of taking temperature.
 - Program Outreach:
 - Near the beginning of each school year the public must be notified that free and reduced price meals, including the eligibility criteria for free and reduced price meals. 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.
 - Inform school families of the availability and location of free summer meals via the Seamless Summer Option (SSO) and Summer Food Service Program (SFSP). Refer to the HDOE website for the list of locations serving free summer meals.

Suggestions

- * Sponsor: Freedom Network Consultants

In HCNP's initial conference with Kamalani Academy in 2019, Freedom Network consultants indicated they were fully versed in the National School Lunch Program. The consultants also indicated they provided assistance in numerous Administrative Reviews in Utah. The State Agency questions why the SFA is contracting with a consulting company who has not focused their technical assistance on meal pattern and menu planning as those areas would result in fiscal actions during a federal



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audit. The State Agency fiscal team would like to know what services the \$2,500 monthly fees provides to Kamalani Academy. The consultative fee cannot be paid from the NSLP non-profit school food service account.

Verification - Kamalani Academy PCS (1444-3)

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

Finding 9000: Other Finding

The Master List used to track student eligibility does not include the dates of student withdrawals or eligibility status changes, which is necessary for maintaining accurate and compliant records.

Corrective Action:

1. Update the Master List to include the dates of student withdrawals and any eligibility status changes.
2. Maintain the updated Master List on file as part of the required documentation to support program compliance and audit readiness.
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.

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

Finding 9000: Other Finding

During the review, it was determined that the SFA did not accurately calculate total household income from paystubs. Specifically, the SFA rounded the gross income for both parents up to the nearest dollar instead of using the exact amounts shown on the paystubs, which may impact eligibility determinations.

Corrective Action:

1. Review the HCNP-recorded training on Verification and Free and Reduced-Price Meal Applications, available on the HCNP website.
2. Maintain documentation (e.g., sign-in sheet, date of review, training agenda) to confirm that staff completed the required training.
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.

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

Finding 9000: Other Finding

The SFA did not use the correct pay frequency when calculating household income.

The dates shown on the paystub is paid biweekly (every two weeks), not semimonthly (twice a month), as was used in the income calculation. The SFA incorrectly multiplied the gross income by 24 instead of the correct factor of 26 for biweekly pay.

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1. Review the HCNP-recorded training on Verification and Free and Reduced-Price Meal Applications, available on the HCNP website.
2. Maintain documentation (e.g., sign-in sheet, date of review, training agenda) to confirm that staff completed the required training.
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.

211. Verification notification letter?**Finding 9000: Other Finding**

The "We Must Check Your Application" letter used during the verification process was incomplete. Specifically, the contact name and date fields at the top of the letter were left blank, which may cause confusion for households and does not meet documentation standards.

Corrective Action:

1. Ensure all verification letters, including the "We Must Check Your Application" letter, are fully completed before being distributed to households.
2. Update the template to include clear instructions for staff to complete all required fields, including contact name and date.
3. Maintain copies of completed letters in verification documentation files for audit purposes.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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213. SFA notice of adverse action - required information, appeal rights?**Finding 9045: SFA's notice of adverse action did not contain all required information.**

The SFA's Notice of Adverse Action, issued as a result of verification, was incomplete and not compliant with USDA requirements. Specifically:

- The names of the affected children were not included in the notice.
- The notice period exceeded 10 calendar days, which violates the required timeframe for notifying households of a reduction or termination of benefits.

Corrective Action:

1. Revise the Notice of Adverse Action template to ensure it includes all required information, including the names of affected children.
2. Ensure that all adverse action notices are issued at least 10 calendar days before the effective date of the change in benefits.
3. Train staff responsible for issuing notices on these requirements.
4. Maintain documentation of completed training and revised notice templates on file.
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



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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.

215. SFA complete verification by Nov 15 or request extension?

Finding 9048: Verification not completed by November 15.

The SFA did not complete the Verification process by the required deadline of November 15, 2021, as mandated by USDA regulations. Additionally, the SFA did not request or receive an extension from the State Agency to extend the deadline to December 15.

Corrective Action:

1. Review Verification process requirements, including annual deadlines and procedures, as outlined in USDA and HCNP guidance.
2. Develop and implement an internal calendar or tracking system to ensure timely completion of all verification activities in future years.
3. Train all responsible staff on Verification timelines and procedures.
4. Maintain documentation of the training and any process updates for compliance monitoring.
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:

Provided technical assistance and reminded staff that in the future, if they do not meet the November 15 deadline, they must request for an extension per regulatory guidance - 7 CFR 245.6a(b)(2)(i)

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

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

Finding 9000: Other Finding

Not all applicable staff received or were documented as having received Civil Rights training, which is required annually for all personnel involved in the administration of the Child Nutrition Programs. Training documentation was only provided for two food service personnel. Documentation is still needed for all other Kamalani staff involved in program operations.

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.
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 and train all appropriate staff on Civil Rights.
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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*Program Year 2022***Kamalani Academy PCS (1444-3)***808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?***Finding 9000: Other Finding**

The SFA did not publish the required public release for the current school year. USDA regulations require SFAs to publicly notify the community at the start of each school year that free and reduced-price meals are available. This notice must be distributed to the local news media, the unemployment office, and any major employers contemplating large layoffs in the attendance area of the school.

Corrective Action:

1. Create the required public release, ensuring it includes the USDA nondiscrimination statement. Each year, HCNP provides a public release template that is available on HCNP's website for SFAs to use and complete.
2. Distribute the release through appropriate channels (e.g., news media, unemployment office, any major employers contemplating large layoffs in the attendance area of the school).
3. Maintain documentation verifying distribution and publication, including copies of the release and where it was posted or sent.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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*810. Non-discrimination on appropriate Program materials?***Finding 9000: Other Finding**

The outreach documents, civil rights complaint procedures, and the Local School Wellness Policy do not include the required USDA nondiscrimination statement. All materials related to the Child Nutrition Programs must include the full, current USDA nondiscrimination statement to ensure compliance with federal civil rights regulations.

Corrective Action:

1. Revise all outreach documents, civil rights complaint procedures, and the Local Wellness Policy to include the current USDA nondiscrimination statement.
2. Review all program materials regularly to ensure the nondiscrimination statement is present and up to date.
3. Maintain documentation of the updated materials on file.
4. 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 9000: Other Finding**

The Local School Wellness Policy for Kamalani is missing several required elements as outlined by USDA regulations. Specifically:

- The Nutrition Standards Guidelines reference compliance with the Texas Public School Nutrition Policy, which is not applicable.
- The policy does not include standards for all foods and beverages provided but not sold to students during the school day.
- There are no clear policies on food and beverage marketing and advertising.

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- The policy lacks a description of public involvement, public updates, leadership roles, and an evaluation plan, all of which are required components of a compliant wellness policy.

Corrective Action:

1. Revise the Local School Wellness Policy to remove references to non-applicable state policies and ensure it includes all USDA-required elements, including:
 - a. Nutrition standards for all foods/beverages provided (not sold).
 - b. Policies on marketing and advertising of foods and beverages.
 - c. Details on public involvement, updates, leadership roles, and a triennial evaluation plan.
 - d. USDA non-discrimination statement.
2. Engage the wellness committee, including representatives from the public and school community, in updating the policy.
3. Maintain documentation showing the policy was revised, including meeting notes and sign-in sheets.
4. Post the updated policy to the SFA's website.
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:

Refer to the below resources to revise the Local Wellness Policy. USDA's Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010: Wellness Policy Summary of the Final Rule, https://fns-prod.azureedge.us/sites/default/files/resourcefiles/LWPsummary_finalrule.pdf Model wellness policy resource at HNCP's website under the Program Resources section.

*1400. Food safety plan – contain required elements, copy available at each school?***Finding 9000: Other Finding**

The written Food Safety Plan maintained by the School Food Authority (SFA) is incomplete and does not contain all required elements as outlined by USDA and HACCP guidelines. Specifically, the Standard Operating Procedures (SOPs) within the plan are not signed or dated, which is a required component to verify annual review and implementation.

Corrective Action:

1. Review and update the written Food Safety Plan to ensure all required components are included (e.g., site-specific SOPs, HACCP-based procedures, monitoring logs).
2. Ensure all SOPs are signed and dated annually by the responsible food service staff or management to confirm review and implementation.
3. Maintain documentation of the annual review of the Food Safety Plan, including sign-in sheets, review logs, and any revisions made.
4. Train appropriate staff on the updated Food Safety Plan and SOPs.
5. Keep training records on file, including agenda, sign-in sheet, and training materials.
6. 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

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 SFSP.

Corrective Action:

1. Create a SOP on how the SFA will inform households annually 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.

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Kamalani Academy PCS (1444-3)

Program Year 2022

Kamalani Academy PCS (553-PCS)

1403 California Ave
Wahiawa, HI 96786

Month of Review: March 2022

Date of Onsite Review: April 19, 2022

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

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

Finding 9000: Other Finding

During Lunch Service 3, it was observed that one female student did not receive a milk before being counted at the point of service (POS). The meal clerk asked the student to return to retrieve the milk after the meal was already counted. Meals must only be counted at the POS after it is verified that all required components of a reimbursable meal have been selected, including milk when offered as part of the meal.

Corrective Action:

1. Retrain all food service and POS staff on proper point of service procedures, ensuring that students are only counted after receiving all components of a reimbursable meal, including milk.
2. Maintain documentation of the training, including sign-in sheets, training agenda, and any materials used.
3. Monitor meal service lines to ensure compliance with POS procedures.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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 served did not meet the USDA minimum meal pattern requirements for the K-8 grade group. Specifically, the required $\frac{3}{4}$ cup of vegetables at lunch was not met; only $\frac{1}{2}$ cup of vegetables was served, which results in a shortage of $\frac{1}{4}$ cup.

Corrective Action:

1. Review and revise the planned menu to ensure it consistently meets the minimum meal pattern requirements for each age/grade group served.
2. Update the food production records to accurately reflect the portion sizes of vegetables and other components served.
3. Train food service staff on meal pattern requirements, especially portion sizes for each component and age group.
4. Maintain training documentation, including sign-in sheets, agenda, and materials used.
5. 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 3/4 cup of vegetable to be offered each day for grades K-8. This requirement was not met on Monday, March 7, 2022, and Friday, March 11, 2022.

- On Monday, 5/8 cup creditable vegetables were offered. The curried chicken sandwich provided 1/8 cup of vegetables and 1/2 cup from the salad.

- Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are creditable at half volume. Therefore, a one cup serving of fresh lettuce or spinach is creditable at 1/2 cup vegetable.

- On Friday, a 1 cup salad was offered, this provided 1/2 cup of creditable vegetable. Consider serving a portion size of 1 1/2 cups to credit as 3/4 cup vegetable.

Corrective Action:

- Update menus to come into compliance with the USDA NSLP meal pattern requirements.
- 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 daily minimum 1 oz. eq. grain requirement for grades K-8. This requirement was not met on Tuesday, March 8, 2022, Wednesday, March 9, 2022, and Friday, March 11, 2022, with only 0.5 oz. eq. offered.

- The white rice used in the hapa rice recipe is not enriched and therefore does not contribute to the grains component. All grains must either be whole grains or enriched in order to be creditable. Replace the white rice with a white rice that is enriched.

The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 8 oz. eq. was not met for grades K-8. The menu offered a minimum of 4.5 oz. eq. of grain for the week of review March 7, 2022 - March 11, 2022.

- Consider increasing the rice to a 1 cup portion or pairing the chili and pesto chicken entrees with dinner rolls as well.

Corrective Action:

- Update menus to come into compliance with the USDA NSLP meal pattern requirements.
- Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

1405. Food safety inspection dates?



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Finding 9000: Other Finding

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.

During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.

Corrective Action:

1. Post the most recent food safety inspection in a publicly visible location.
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.