



SNP Administrative Review Findings Program Year 2023

Kua O Ka Lā New Century PCS (2415-5)

Kua O Ka Lā New Century PCS (2415-5)

345 Makalika Street
Hilo, HI 96720

No. of Sites / Reviewed: 2 / 1

Month of Review: March 2023

Date of Review: April 17-21, 2023

Exit Conference: April 21, 2023

Due Date for Corrective Action: June 19, 2025

Commendations

* Summary: Commendations.

At Nani Mau, staff allow students who come to school late to eat breakfast.

Staff interacts well with the students during meal service.

Thank you for being flexible and ready to record the meal preparation and meal service when the internet connection was not cooperating.

Suggestions

* Summary: Suggestions.

If interested in purchasing a refrigerator or milk cooler to store the leftover milk, consider applying for the NSLP Equipment Grant. The leftover milk can be stored to have on hand if more milk is needed if there is not enough of a particular milk type during meal service. Contact the NSLPE Grant Specialist at HCNP if you have any questions about applying for the NSLP Equipment Grant.

Meal Counting & Claiming - Kua 'O Ka La PCS (2415-5)

314. SFA following approved SFA-SA agreement?

Finding 9049: SFA not following the approved SFA-SA Agreement and/or Application.

The SFA is not following their approved SFA-State agency Application, including the Point of Service (POS) procedures. Discrepancies between approved documentation and observations on site:

- Preschool students are served in a separate dining area.
- Preschool meal counting was not done at the point of service. The breakfast was served to all preschool students, and then meals were counted.
- Students are not verbally identifying themselves at the POS. Students are moving quickly through the serving line, especially when there is a group of students.

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.
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. Update the site application in HCNP Systems to reflect the serving of meals in another location on the school campus.
7. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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:

Meals must be counted immediately after the student receives a reimbursable meal. During a discussion with the staff, it was mentioned that the other site (Puula Church) places all of the meal trays on the table, then the meal counter counts the meals as each student sits at the table. The SFA should consider following the same process at the Nani Mau site. If this does not work at the Nani Mau site, suggest having the preschool teacher assist with meal service. For example, the teacher could place the tray down as the students sit at the table, and the meal counter can do the meal counting as each student receives their reimbursable meal.

During meal service, have students stop in front of the meal clerk and teach them to state their name and grade. Having the students verbally identify themselves serves as the medium of exchange for obtaining a meal and will allow the meal clerk time to check that the student has a reimbursable meal, look for the student's name on the checklist, count the meal, and record the meal order. Teaching students to verbally identify themselves will also be beneficial when the substitute meal clerk or a new meal clerk is counting meals, since that person may not be familiar with all of the students.

General Program Compliance - Kua 'O Ka La PCS (2415-5)**808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?****Finding 9000: Other Finding**

The Civil Rights Ethnic Data Report Form 0-4c was not provided. The SFA provided the Student Enrollment summary report.

Corrective Action:

1. Complete the Civil Rights Ethnic Data Report Form 0-4c annually.
2. Maintain the completed Form 0-4c.
3. 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**

The most current nondiscrimination statement is not used on the school's website under "Ohana Notices/Resources" -> HCNP.

Corrective Action:

1. Use the most current nondiscrimination statement on all program materials, including school websites and social media. The current nondiscrimination statement is available at <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>. Review the document. Please note that the full nondiscrimination statement is all the wording listed in the large box on the document.
2. Keep documentation demonstrating that the corrections were made to the program materials.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Kua O Ka Lā New Century PCS (2415-5)

Program Year 2023

be implemented to resolve the findings and provide assurance to HCNP that the corrective action will be implemented.

Technical Assistance:

HCNP let the SFA know that the most current nondiscrimination statement is available on HCNP's website.

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

Finding 9000: Other Finding

The SFA did not provide medical statements during the review period to determine compliance.

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.

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 did not provide a Civil Rights Complaint Log during the review period to determine compliance.

Corrective Action:

1. Create and implement a Civil Rights Complaint Log for each school year.
2. Annually review and update the Civil Rights Complaint Log.
3. Maintain on file the Civil Rights 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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Technical Assistance:

The SFA must have a complaint log for each school year, even if no complaints were received.

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

Finding 9000: Other Finding

The SFA did not provide any documentation that an annual or triennial assessment of the Local School Wellness Policy was completed. The current School Wellness Policy is dated February 1, 2018.

The SFA does not maintain documentation of the School Wellness Policy committee meetings.

Corrective Action:

1. Create a process to ensure an annual or triennial assessment of the Local School Wellness Policy is completed as required.
2. Keep documentation to support the annual or triennial assessment of the Local School Wellness Policy.

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3. Keep meeting documentation (board minutes, meeting minutes, members in attendance, date of meeting) that support reviews of the Local Wellness Policy.
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 SFA did not provide documentation to show that the appropriate people were notified to be involved in the development, implementation, periodic review, and update of the School's Local School Wellness Policy.

The SFA did not provide documentation to show that they reached out to potential stakeholders to participate in the development, review, update, and implementation of the school's Local School Wellness Policy.

Corrective Action:

1. Create a process on 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 implementation 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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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 SFAs must maintain a current and compliant Local School Wellness Policy. During the Administrative Review, it was determined that the policy on file is not in compliance with all USDA requirements.

The following requirement is missing from their wellness policy:

- The wellness policy does not limit the number of exempt fundraisers per school day per school campus each year. Refer to the Smart Snacks Hawaii Exemption Policy on HCNP's website: <https://hcnp.hawaii.gov/wp-content/uploads/2018/11/Smart-Snacks-Hawaii-Exemption-Policy.pdf>.

Corrective Action:

1. Update the Local School Wellness Policy to ensure it includes all required USDA elements and complies with current guidelines.
2. Post the updated Local School Wellness Policy on the SFA's website for public access.
3. 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 2023**Kua O Ka Lā New Century PCS (2415-5)****1211. Validate OFS #1201 - SFA employee count****Finding 9000: Other Finding**

The SFA did not name a School Nutrition Program Director; SFAs are required to have a School Nutrition Program Director.

Corrective Action:

1. The SFA is required to name a School Nutrition Program Director.
2. If the SFA does not currently have someone who meets the USDA hiring standards for the School Nutrition Program Director, submit a letter on the school's letterhead requesting HCNP's approval to have a designated staff member be the School Nutrition Program Director.
3. Re-categorize all employees under the correct USDA Professional Standards job category and ensure the required training hours have been or will be completed annually.
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:

The SFA is required to name a School Nutrition Program Director. The individual who plans, administers, implements, monitors, and evaluates all district-wide aspects of the school nutrition program is generally considered a school nutrition program director. In a few SFAs, district-level program responsibilities are divided into several positions. In that situation, only the person hired to perform the majority of the nutrition program director duties must meet the hiring standards. Information on the USDA Professional Standards was shared with the SFA

- Guide to Professional Standards for School Nutrition Programs: https://fns-prod.azureedge.us/sites/default/files/resource-files/Professional_Standards_Guide.pdf

-SP 05-2020 Questions & Answers Regarding Professional Standards for State and Local School Nutrition Program Personnel:

<https://fns-prod.azureedge.us/sites/default/files/resource-files/SP05-2020os.pdf>.

If the SFA does not currently have someone who meets the USDA hiring standards for the School Nutrition Program Director, submit a letter on the school's letterhead requesting HCNP's approval to have a designated staff member be the School Nutrition Program Director.

1212. Validate OFS #1202 - Were hiring requirements met when hiring new Director?**Finding 9000: Other Finding**

The SFA did not provide documentation that the School Nutrition Program Director met the professional standards hiring requirements.

Corrective Action:

1. The SFA must ensure that any new director hired on or after July 1, 2015 meets the USDA Professional Standards requirements.
2. Keep all documentation on file to support the hiring requirements for new directors. Documentation 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.
3. 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 2023**Kua O Ka Lā New Century PCS (2415-5)****1213. Validate OFS #1203 - Did new Director meet food safety certification and training requirements?****Finding 9000: Other Finding**

The SFA did not provide food safety training documentation for the School Nutrition Program Director.

Corrective Action:

1. The School Nutrition Program Director must complete required 8 hours of food safety training. The food safety training must be completed either not more than 5 years prior to their starting date or completed within 30 days of the employee's starting date.
2. Keep training documentation (certificate) to confirm that training was completed. Documentation 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.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1214. Validate OFS #1204 - Did the School Nutrition Director meet annual training requirements?**Finding 9000: Other Finding**

The SFA did not provide documentation of completed or planned training hours for the School Nutrition Program Director.

Corrective Action:

1. Annually, the Director must complete a minimum of 12 hours of training relevant to their role and responsibilities.
2. Keep training documentation on file to verify that the Director completed the required 12 hours of training.
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.

1215. Validate OFS #1205 - Did School Nutrition Manager meet annual training requirements?**Finding 9000: Other Finding**

The SFA did not provide documentation of completed or planned training hours for the School Nutrition Program Manager.

Corrective Action:

1. Annually, the Manager must complete a minimum of 10 hours of training relevant to their role and responsibilities.
2. Keep the training documentation on file to confirm that the Manager completed the required 10 hours of training.
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.

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1216. Validate OFS #1206 - Did School Nutrition personnel meet annual training requirements?**Finding 9000: Other Finding**

The SFA did not provide documentation of completed or planned training hours for the School Nutrition Program personnel.

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 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.

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1217. Frequency of tracking training hours**Finding 9000: Other Finding**

The SFA did not provide documentation of the frequency with which training is tracked or the training tracking tool used to track professional standards training hours.

Corrective Action:

1. Each year, the School Nutrition Program Personnel must complete the required trainings related to their job duties and meet the annual training hours requirement.
2. Create a standard operating procedure (SOP) detailing how all school nutrition employees at the SFA level and at the school level will meet the required professional standards training hours requirement annually. Include in the procedures how the SFA will maintain documentation demonstrating all School Nutrition Program Personnel have met the required training hours annually and how the SFA will have all required information readily available for review upon request by the State Agency.
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. 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.
6. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Kua O Ka Lā New Century PCS (2415-5)

must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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 Process #1: No Cook chart and Process #2: Same Day Service chart within the SFA's Food Safety Plan are incomplete. All process charts must be fully developed to reflect proper food safety practices. The SFA must ensure that all documents included in the Food Safety Plan are current, complete, and finalized in accordance with USDA and HACCP guidelines.

Corrective Action:

1. Review and update the Process #1 and Process #2 Charts to ensure they include accurate information regarding food safety temperatures (cooking, holding, cooling, reheating) as per the latest case/product specifications and regulatory requirements.
2. This review will include aligning the chart with the SOPs for food safety processes, ensuring the temperatures meet the guidelines for food safety as outlined in the USDA/FDA and State of Hawaii Department of Health recommendations.
3. The Food Safety Plan, including the Process #2 Chart and all SOPs, will be reviewed annually to ensure they remain accurate and compliant with current food safety regulations.
4. 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

Summer Food Service Program (SFSP) outreach was not done for summer 2022.

The SFA only submitted breakfast outreach documentation of what is on the school's website. The SFA did not submit documentation to demonstrate other ways households were informed about the availability of the school breakfast program.

Corrective Action:

1. Create a standard operating procedure (SOP) on how the SFA will ensure households are notified about the availability of the School Breakfast Program prior to, or at the beginning of the school year.
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. 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.
5. Train all appropriate staff on the SOP.
6. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
7. Training documentation and documentation demonstrating annual School Breakfast Program and Summer Food Service Program outreach 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.
8. 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:

SFAs are required to notify households of the availability and location of free summer meals. HCNP informs SFAs of the sites

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that offer free summer meals. The SFA must share this information with the households beginning with the upcoming summer, the summer of 2023. Outreach information may be distributed through means normally used to communicate with households of enrolled children. The SFA must maintain documentation to demonstrate that this requirement was met.

SFAs must conduct School Breakfast Program outreach prior to or at the beginning of the school year and should provide reminders multiple times during the school year. The SFA must include breakfast meal service times in the notification to households. The SFA must maintain documentation to demonstrate that this requirement was met.

IX Special Provision Options - Kua 'O Ka La PCS (2415-5)**2115. CEP most recent approval – documentation support ISP and claiming percentages?****Finding 9000: Community Eligibility Provision (CEP)**

Based on a review of the documentation that was provided by the SFA for the SY 2022-2023 Administrative Review (AR), HCNP was not able to validate the SFA's CEP base year identified student percentages (ISPs) that were effective during SY 2022-2023 due to insufficient documentation.

Missing documentation and the inability to validate a CEP ISP is a serious concern that impacts the integrity of claims for reimbursement. Ordinarily, in a situation in which the ISP cannot be validated, an ISP would have to be recalculated and fiscal action would be applied to the difference between the newly calculated ISP and whatever ISP was in place. However, given that ISPs that were being used in SY 22-23 are very old and no longer in use, the USDA Food and Nutrition Service is providing HCNP with the flexibility to require Kua O Ka La PCS to establish new ISPs for SY 2024-2025 (in other words, SY 24-25 will be Kua O Ka La PCS' new CEP base year). HCNP must validate the ISPs for SY 24-25 at the time of application. There will be no further action on validating the ISPs or applying fiscal action for invalidated and recalculated ISPs for Kua O Ka La PCS' SY 22-23 AR.

SFAs are responsible for maintaining all documentation that supports the ISPs and CEP claiming percentages. Program records must be maintained for a minimum of three years plus the current year, or six years plus the current year, if required to follow the Hawaii State Department of Education requirement. If audit findings have not been resolved, these records must be retained beyond the three or six-year period as long as required for the resolution of issues raised by the audit.

Corrective Action:

1. Create a standard operating procedure (SOP) explaining in detail how the SFA will maintain all documentation supporting the ISP numbers for the CEP base years for the required minimum number of years.
2. Keep supporting documentation to support the ISP numbers for the CEP base years on file and have it readily available upon request by the State Agency.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Kua O Ka Lā New Century PCS (2415-5)

Nani Mau (557-PCS)

345 Makalika Street
Hilo, HI 96720

Month of Review: March 2023

Meal Observation: April 19-20, 2023

Technical Assistance

* Meal Components & Quantities Question: 400.: Share Table

The SFA was advised to keep a pan of ice on the share table to keep milk cool for the students who do not want their milk.

The SFA was advised to contact the Department of Health Sanitation Branch to ask about reusing the milk that students place on the shared table, and if they are required to cover plated food since it is served outdoors, and the plated food that is delivered to the Pre-K.

* Meal Components & Quantities Question: 404.: Meal Signage

Signage (explaining the reimbursable meal for the day)

- The SFA was reminded to include milk on the large chart paper on the easel since milk is a required meal component.
- The "Today's Breakfast Choice: and "Today's Lunch Choice" signage that the SFA currently uses is for Offer vs. Serve (OVS). Since the SFA is not implementing OVS, the SFA must use the signage for non-OVS sites.
- When listing the milk component on daily signage, only list the milk types offered. Dairy products such as queso should not be listed under the Milk section.

Meal Counting & Claiming - Nani Mau (557-PCS)

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

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The SFA's claim for the school for the Review Period does not match the State agency's validated meal counts by category for the school for the Review Period. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

For the month of March 2023, meal counting errors resulted in an overclaim of 2 breakfasts and 4 lunches for the Nani Mau site, and this resulted in fiscal action.

Lunch

- o 3/10/2023 overclaimed 1 meal (Grade K)
- o 3/24/2023 overclaimed 2 meals (Grade 1)
- o 3/31/2023 overclaimed 1 meal (Grade 3)

Breakfast

- o 3/24/2023 overclaimed 2 meals (Grade 6)

Corrective Action:

1. To correct this finding, submit a standard operating procedure (SOP) of the new/revised meal counting and claiming process that will be implemented to ensure an accurate meal counting and claiming system, including the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.
2. Train all appropriate staff on the SOP.
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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Technical Assistance:

The SFA currently has a manual meal counting system (checklist). One person totals the meal counts and enters the information on the Edit Check worksheet. For a manual meal counting system, designate staff to be a second set of eyes to recount and double-check all meal count totals and check that the totals are entered correctly onto the Edit Check Worksheet to help ensure an accurate claim is submitted. This procedure needs to be implemented SFA-wide (at both sites). The SFA must revise the meal counting and claiming procedures and train all appropriate staff. The SFA must maintain training documentation demonstrating that the required staff members were trained.

The attendance factor on the Edit Check Worksheet needs to include the decimal.

-The attendance factor for Nani Mau is 88.3% (from the most recent October survey). Enter 0.883 on the Edit Check Worksheet, instead of 88.

-The attendance factor for Puula Church is 86.7%. Enter 0.867 on the Edit Check Worksheet, instead of 87.

-When the E appears under the Comments column of the Edit Check Worksheet, the SFA must specify the attendance and enrollment for the day when the E appears to justify that meal counts do not exceed the attendance and enrollment for that day. The SFA must maintain documentation (school enrollment and attendance reports) with the Edit Check Worksheet.

Meal Components & Quantities - Nani Mau (557-PCS)

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

Finding 9000: Other Finding

The SFA does not comply with the Child and Adult Care Food Program (CACFP) breakfast meal pattern requirements for the Pre-K age/grade group when Pre-K is not co-mingled with other age/grade groups. The cereal served at breakfast contained 9 grams of sugar for a serving size of 31 grams.

Corrective Action:

1. Review CACFP meal pattern requirements for the Pre-K age/grade group: <https://www.fns.usda.gov/cacfp/nutrition-standards/breakfast-meal-pattern>.
2. Update Pre-K menus to comply with the CACFP Pre-K meal pattern requirements. This includes serving breakfast cereals that do not exceed the sugar limit.
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.

Technical Assistance:

HCNP provided a link to the "USDA's Choose Breakfast Cereals That Are Lower in Sugar" and explained how to use the chart in this resource.

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

Finding 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.

As observed on the Day of Review, signage (explaining the reimbursable meal for the day) was not posted in the preschool serving area. The SFA posted meal signage in the Pre-K serving area - no further action is required.

Corrective Action:

The SFA corrected this during the review - no further action is required.



SNP Administrative Review Findings

Kua O Ka Lā New Century PCS (2415-5)

Program Year 2023

Technical Assistance:

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

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

Finding 9000: Other Finding

On March 9, 2023, it appears only one milk type was available at breakfast. The Serving Site Record listed 56 white milk and 0 chocolate milk.

SFAs must offer at least two different varieties of fluid milk. All fluid milk must be fat-free (skim) or low-fat (1 percent fat or less). Milk may be flavored or unflavored, provided that unflavored milk is offered at each meal service.

Corrective Action:

1. Complete trainings on the National School Lunch (NSLP) and School Breakfast Program (SBP) meal pattern requirements.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that meal pattern training was completed by appropriate staff.
3. Create a Standard Operating Procedure (SOP) to ensure that two types of milk are consistently available throughout the entire meal service period on all meal service lines. Include in the SOP what the SFA will do when the vendor does not provide two acceptable milk types.
4. Provide training to all relevant staff on the contents and implementation of the new SOP.
5. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.
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.

Technical Assistance:

Meal pattern requirements were discussed with the vendor, and a variety of milk (at least two milk types) must be available during meal services. Therefore, if the fat-free chocolate milk from Meadow Gold is unavailable, they may offer the shelf-stable version of milk or a fat-free unflavored milk in addition to the 1% unflavored milk.

General Program Compliance - Nani Mau (557-PCS)

811. Justice for All poster displayed in prominent location?

Finding 9000: Other Finding

The USDA "And Justice for All" poster was not prominently posted in the Pre-K service area. The SFA provided a photo of the poster during the review. No further action is required.

Corrective Action:

The SFA provided a photo of the poster during the review. No further action is required.

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

Finding 9000: Other Finding

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure.

Corrective Action:

1. Complete an on-site review for all points of service prior to February 1 annually
2. Keep the completed MC-7 forms on file to demonstrate that the annual on-site review requirement was met.
3. Create a standard operating procedure (SOP) on how the SFA will ensure all point-of-service locations, including classrooms, are monitored annually.

SNP Administrative Review Findings**Kua O Ka Lā New Century PCS (2415-5)****Program Year 2023**

4. Train all appropriate staff on the SOP.
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.

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:

The review must be completed at all sites every year prior to February 1. At a minimum, the SFA must conduct the on-site review of the meal counting and claiming system and readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program and 50% of schools operating the School Breakfast Program (SBP) under its jurisdiction. Complete the on-site monitoring before the end of the school year.

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 most current food safety inspection report was not posted in a publicly visible location at Nani Mau.

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.

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.

1408. Temperature logs available?**Finding 9149: Temperature logs unavailable for review.**

The SFA did not provide food equipment temperature logs or thermometer calibration logs.

Corrective Action:

1. Review and train on the Standard Operating Procedures (SOPs) for calibrating thermometers and maintaining temperature logs for all food equipment and thermometer calibration from the SFA's food safety plan.
2. Train all food service staff on the SOPs.
3. Keep training documentation (sign-in sheet, date of training, agenda) on file to confirm that training was completed with appropriate staff.
4. Keep temperature logs on file per recordkeeping retention requirements and have available for review as requested by the State Agency.
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.