



SNP Administrative Review Findings

Nā Wai Ola PCS (2412-1)

Program Year 2022

Nā Wai Ola PCS (2412-1)

18-1355 Volcano Rd.
Mountain View, HI 96771

No. of Sites / Reviewed: 1 / 1

Month of Review: April 2022

Date of Review: May 19-25, 2022

Exit Conference: May 25, 2022

Due Date for Corrective Action: July 3, 2025

Technical Assistance

* Sponsor: CEP

Reminded SFA to retain all CEP data/supporting documentation in one folder/binder with the CEP Data Collection Form that was submitted to HCNP. HCNP highly recommends keeping an electronic copy of the data as well.

General Program Compliance - Nā Wai Ola PCS (2412-1)

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

Finding 9000: Other Finding

The complaint log was incomplete and did not contain the most current nondiscrimination statement. The SFA must maintain a complaint log and make sure it contains the most current nondiscrimination statement.

Corrective Action:

1. Create and implement the most recent Civil Rights Complaint Log, ensuring it includes the updated non-discrimination statement. HCNP has a complaint form available on HCNP's website for SFAs to utilize at: <https://hcnp.hawaii.gov/wp-content/uploads/2016/10/Civil-Rights-Complaint-Log.doc>
2. Annually review and update the Civil Rights Complaint Log to ensure compliance with USDA regulations.
3. Maintain the Civil Rights Complaint Log 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

HCNP's records indicate that four staff completed the civil rights training. The SFA only submitted documentation that one staff completed the training. 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

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requirement area.

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Technical Assistance:

Informed SFA that USDA recently informed us that the nondiscrimination statement has changed so HCNP will be updating the nondiscrimination statement on the forms so the SFA will need to update their forms once the revised forms are posted to on HCNP's website.

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

The civil rights complaint procedure that was submitted by the SFA is the USDA Complaint procedure. Provided technical assistance to the SFA to use and include the Civil Rights Complaint Procedure Flowchart and Non-discrimination Procedures that are posted on HCNP's website in the SFA's civil rights binder.

Corrective Action:

1. Replace the USDA Complaint Procedure with the Civil Rights Complaint Procedure Flowchart and Non-discrimination Procedures that are posted on HCNP's website.
2. All appropriate staff must review and implement the Civil Rights Complaint Procedure Flowchart and Non-discrimination Procedures.
3. Annually review the Complaint Procedure as part of the Civil Rights training to ensure it remains compliant with USDA regulations.
4. Maintain a copy of the Complaint Procedure on file for reference and compliance purposes.
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**

SFA informed families of the school's participation in CEP via the school website and the OneCall system (an automated system used to send communications to families). Reminded the SFA that the CEP public release must be sent to the media, and to maintain documentation to support this was completed. Please do this next school year in addition to the other methods that were done for SY 21-22.

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.

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810. Non-discrimination on appropriate Program materials?



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Program Year 2022

Finding 9000: Other Finding

The School Breakfast Program reminders, summer meals outreach (summer months), and Local Wellness Policy Communication do not contain the USDA nondiscrimination statement. All program materials must include the USDA nondiscrimination statement.

The SFA used a different nondiscrimination statement on the SSO Outreach. The current USDA nondiscrimination statement must be included on all program materials.

Corrective Action:

1. Update all program materials with the correct and current non-discrimination statement. 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. The full statement is everything 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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1400. Food safety plan – contain required elements, copy available at each school?

Finding 9000: Other Finding

Temperatures listed on the Process #2 Chart in the Food Safety Plan are outdated or incorrect. The chart does not reflect the correct cooking, holding, cooling, or reheating temperatures listed in the product preparation instructions from the case/product specification sheets.

Corrective Action:

1. Review and update the Process #2 Chart to ensure it includes 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 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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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 contain the required elements. The SFA's Food Safety Plan's Standard Operating Procedures (SOP) are missing.

Corrective Action:

1. Create and add Food Safety Standard Operating Procedures (SOPs) to the SFA's Food Safety Plan. HCNP has Food Safety SOP templates available on HCNP's website for SFAs to use.
2. Conduct an annual review of the Standard Operating Procedures (SOPs). Ensure the review is documented by signing and dating the SOPs to confirm the annual review has been completed.
3. Train all appropriate staff on the SOPs.

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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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IX Special Provision Options - Na Wai Ola PCS (2412-1)**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 2021-2022 Administrative Review (AR), HCNP was not able to validate the SFA's CEP base year identified student percentages (ISPs) that were effective during SY 2021-2022 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 21-22 are very old and no longer in use, the USDA Food and Nutrition Service is providing HCNP with the flexibility to require Na Wai Ola PCS to establish new ISPs for SY 2024-2025. HCNP must validate the ISPs 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 Na Wai Ola PCS' SY 21-22 AR.

Na Wai Ola started a new CEP cycle (district-wide) in SY 2023-2024. A new ISP was established and validated by the State Agency at the time of application, effective SY 23-24.

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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SNP Administrative Review Findings

Nā Wai Ola PCS (2412-1)

Program Year 2022

Nā Wai Ola PCS (398-PCS)

18-1355 Volcano Rd.
Mountain View, HI 96771

Month of Review: April 2022

Date of Onsite Review: May 19, 2022

Commendations

* Documentation

Staff did a good job of submitting documentation to Dropbox.

* Live Streaming

Staff did a great job recording meal preparation and live streaming meal service - best commentary we have seen this year!

* Local Wellness Policy

SFA held several meetings in 2021 to discuss the Local Wellness Policy. SFA did a good job maintaining the meeting notes.

Technical Assistance

* Meal Components & Quantities: Weight Versus Volume

Provided information on weight versus volume when measuring food items. The example provided was 4 oz of broccoli by weight is not the same amount as measuring broccoli using a 4 oz spoodle (1/2 cup). The amount of broccoli that fits in 4 oz spoodle weighs about 1.4 oz. Also, reviewed reading the nutrition facts label of food items to help determine how much product to serve. SFA does a good job using the USDA Food Buying Guide, but explained to the SFA that the Food Buying Guide is based on averages and it is also important to use the information on the food labels/Product Formulation Statement that the SFA is purchasing.

Suggestions

* Meal Components & Quantities: Breakfast

For the breakfast meal with cereal, granola, and dried cranberries: as you're portioning the cereal and granola into one bowl, set all of these bowls as the bottom layer and then as you're portioning the cranberries into another bowl, put all of these bowls on top the bowls of cereal and granola (as the top layer) to help make it easier to serve. This way, you can serve each student one stack of bowls (fruit in the top bowl and grain in the bottom bowl).

Meal Components & Quantities - Nā Wai Ola PCS (398-PCS)

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

Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served.

The whole grain-rich requirement was not met for breakfast. The menu offered 74% whole grains for the week of review for grades K-8. 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.

On Monday, April 4, 2022, the SFA served a wheat roll that was not whole grain-rich. SFA corrected this immediately once informed of this by ordering WG-rich English muffins to serve the last week of school (on May 24, 2022).

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1. Update menus to come into compliance with USDA SBP meal pattern requirements.
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.**

Not all information on the daily production records is correctly documented.

- The production record currently lists 1% chocolate milk for two of the breakfast meals (wheat roll and cereal/granola). SFA explained that they forgot to update the production record template from last school year for these days and only fat free chocolate milk was served.
- Sliced cheese: the label says 1 slice is 19 grams. This is equal to 0.6 oz (0.5 oz eq). Update the production record template to list 0.5 oz eq instead of 1 oz eq.
- Peanut butter: peanut butter is a meat alternate. Update the production record template to include the 0.5 oz eq meat alternate from the peanut butter served with the cheeseburger meal.
- Sweet potato fries: update production record template to show total amount needed is 28.7# instead of 26.25#. This is the amount that is needed to provide 100 – $\frac{3}{4}$ cup servings according to the Product Formulation Statement. SFA explained that 2 cases of sweet potato fries (30#) are prepared when this meal is made which is sufficient.
- SFA should look into purchasing a food scale so the food service manager can weigh items such as the fajita chicken for the nachos to determine the amount (weight) of chicken that is being served per serving using the 2-oz serving utensil. Maintain this documentation and update the production record template under the Serving Size column with the weight of the chicken per serving and adjust the meat/meat alternate crediting, if needed based on the crediting information on the Product Formulation Statement.

Corrective Action

1. Provide training to the kitchen staff on how to accurately complete production records and menu documentation.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that production record training and menu documentation were completed by kitchen staff.
3. Maintain completed production records and supporting documentation for all meals planned, produced, and served.
4. 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 - Nā Wai Ola PCS (398-PCS)**901. On-site monitoring review completed prior to February 1?****Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.**

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without SA approval of an extension.

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.

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3. Create a standard operating procedure (SOP) on how the SFA will ensure all point-of-service locations, including classrooms, are monitored annually.
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.

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1407. SFA written food safety plan implemented?**Finding 9000: Other Finding**

The required cooking temperature logs are not being maintained, and the cooking temperature of food is not being documented immediately after cooking (before food is held hot for service).

Corrective Action:

1. Create a standard operating procedure (SOP) on how the SFA will ensure daily cooking temperature logs are maintained. Include how the SFA will ensure the cooking temperature of the food is documented immediately after cooking.
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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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.**

HACCP principles were not properly observed due to insufficient hand washing procedures, a critical component of food safety.

Corrective Action:

1. Review the handwashing 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.

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1411. Did any review of products indicate violations of the Buy American provision?**Finding 9000: Other Finding**

The SFA did not have documentation for Buy Hawaii exceptions. SFAs are required to purchase, to the maximum extent

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practicable, food that is produced and processed in Hawaii. Limited exceptions are allowable, but SFAs must keep documentation justifying the exceptions. Exceptions could include limited availability or significant price differences.

Corrective Action:

1. Create a centralized record to document all products purchased in Hawaii, and for each exception made to the Buy Hawaii policy (e.g., products not available locally or unavailable at competitive prices), a written justification must be documented.
2. Maintain documentation on file for all Buy Hawaii purchases and justifications.
3. Annually review purchasing practices to ensure that local sourcing is prioritized and that all exceptions are justified and documented properly.
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.