



SNP Administrative Review Findings Program Year 2022

Volcano School of Arts & Sciences (2409-1)

Volcano School of Arts & Sciences (2409-1)

99-128 Old Volcano Rd
Volcano, HI 96785-0845

No. of Sites / Reviewed: 2 / 1

Month of Review: April 2022

Date of Review: May 17-20, 2022

Exit Conference: May 20, 2022

Due Date for Corrective Action: **July 1, 2025**

Commendations

* Summary: Commendations.

The staff did a good job submitting documentation to Dropbox.

The staff was quick in their responses to questions and in providing additional information as needed. Thank you for your flexibility and for being accommodating to our schedules.

Delivery bags for the Main Campus were packed neatly and efficiently. Meal service at the KKL site was expedited smoothly.

Kitchen staff worked efficiently to produce appetizing and appealing meals.

Good job creating and compiling documents to describe your SFA's internal procedures for various nutrition program-related tasks! This is a good starting point for establishing internal controls and standard operating procedures for your SFA's meal program.

Technical Assistance

* General Program Compliance: CEP Data Collection

HCNP's CEP Data Collection Form is sent to all SFAs annually and must be used to calculate your SFA's identified student percentage (ISP). Typically, SFAs must calculate their ISP as of April 1 annually (not in mid-October). The reviewer provided additional technical assistance about the reports needed and the procedures for completing the annual CEP Data Collection Form.

* General Program Compliance: Procedural Technical Assistance

Technical assistance was provided on updating various procedural documents to ensure that the information is correct and accurate (i.e., "CHILD NUTRITION CIVIL RIGHTS GUIDANCE & COMPLAINT PROCESS", "Procedure for Ensuring Accuracy for CEP").

* General Program Compliance: Ethnic Data Report

The reviewer discussed properly completing the Ethnic Data Report. The SFA must ensure the form is fully completed, signed, and dated by October 31 annually. The SFA must retain the report on file in accordance with recordkeeping requirements. Items requiring attention on the SY 21-22 Ethnic Data Report were corrected during the virtual AR, and no further corrective action is needed.

Meal Counting & Claiming - Volcano School of Arts & Sciences (2409-1)

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 Site Application. The breakfast and lunch meal service times provided during the administrative review do not match the site-approved application on file. For example, breakfast starts at 7:30, not 7:15; lunch service begins at 11:45, not 10:45.

SNP Administrative Review Findings**Volcano School of Arts & Sciences (2409-1)****Program Year 2022****Corrective Action:**

1. Revise the NSLP renewal application to accurately reflect all meal service locations, including the off-campus agriculture program site.
2. Complete the required offline form indicating where meals are being served.
3. Ensure future updates to the application accurately reflect all sites and service procedures to maintain compliance with the approved agreement.
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.

316. SA validated meal counts – school level meal counts consolidated correctly? Enter data.

Finding 9051: SFA's Review Period claim not validated.

There are differences between the SFA's Review Period claim and the State agency's validated counts for lunch and breakfast for one or more schools for the review period, as documented on S-1.

The SFA claimed 105 free breakfasts for Keakealani Middle School. The daily edit checks and state agency validated count were 276. The total number of eligible students (105) was entered as the total meals claimed in the HCNP web system. Therefore, the SFA underclaimed 171 free breakfasts for Keakealani Middle School.

The SFA claimed 1,550 free breakfasts for Old Volcano Rd. However, the reviewer validated 1,557 free breakfasts; therefore, the SFA underclaimed 7 free breakfasts for Old Volcano Rd.

The differences between the SFA and SA counts for Old Volcano Rd:

4/6/2025: The SFA claimed 67, the reviewer validated 73 tally marks (underclaim 6)

4/18/2025: The SFA claimed 63, the reviewer validated 65 tally marks (underclaim 2)

4/21/2025: The SFA claimed 90, the reviewer validated 88 tally marks (overclaim 2)

4/29/2025: The SFA claimed 79, the reviewer validated 80 tally marks (underclaim 1)

The SFA claimed 2,045 free lunches for Old Volcano School. However, the reviewer validated 2,047 free lunches; therefore, the SFA underclaimed 2 free lunches. The error was on 4/21/25. The SFA claimed 110 free lunches. The reviewer validated 112 tally marks.

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.

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 2022

Volcano School of Arts & Sciences (2409-1)

General Program Compliance - Volcano School of Arts & Sciences (2409-1)

810. Non-discrimination on appropriate Program materials?

Finding 9000: Other Finding

The non-discrimination statement was not included in the CEP public media release or local wellness policy. Please ensure the current non-discrimination statement is included on all program-related materials distributed to the public.

Corrective Action:

1. Review and revise all documents to ensure they contain the current, complete USDA nondiscrimination 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. Replace any materials that include outdated, missing, 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

All SFAs are required to maintain a current and USDA-compliant Local School Wellness Policy (LWP). During the Administrative Review, it was determined that the SFA's policy does not meet all USDA requirements. The following elements are missing or incomplete:

- Policy on food and beverage marketing, ensuring compliance with Smart Snacks in School standards
- Clear description of public involvement, including opportunities for participation, public updates, and details on leadership roles, meeting frequency, and evaluation procedures
- Does not include participation for all potential stakeholders, such as the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process
- A process for conducting the Triennial Assessment, including benchmarks to assess progress toward nutrition goals (e.g., increasing fruit and vegetable consumption by 25%), and how the wellness policy compares to model wellness policies
- How the results of the annual and triennial assessments are made available to the public
- A plan for the annual review of the wellness policy (as required by K-20 Education Code 1003.453) to evaluate and measure its implementation
- Include limits on competitive foods in FAC 5P-2.002 as applicable, i.e., limits on special exempt fundraisers
- Specific goals for other school-based activities to promote student wellness
- Inclusion of the USDA Non-Discrimination Statement

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.

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

Volcano School of Arts & Sciences (2409-1)

Program Year 2022

Technical Assistance:

A Model Wellness Policy can be found on the HCNP website at <https://hcnp.hawaii.gov/wp-content/uploads/2019/09/AHG-Model-Wellness-Policy-2.docx>.

Additional Local Wellness Policy information can be found at <https://www.fns.usda.gov/tn/wellness-policy>.

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 that an assessment of the Local Wellness Policy (LWP) was completed.

Corrective Action:

1. Complete the assessment of the wellness policy and make the assessment available to the public.
2. Keep documentation on file to show that the public requirement was met.
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 provided a flyer sent to families and board members, but did not provide documentation on how they notify other stakeholders of their ability to participate. Documentation was not provided on how the SFA reached out to potential stakeholders (parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public) on how they may be involved in or participate in the development, implementation, periodic review, and updates of the Local School Wellness Policy.

Corrective Action:

1. The wellness policy leadership in the Local Wellness Policy of one or more SFA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy must make sure that the public involvement requirement is met and documented.
2. To meet the public involvement requirement, in the wellness policy, add information on efforts to review and update the wellness policy, who is involved, and how stakeholders are aware of their ability to participate.
3. Keep documentation on file to show that the public requirement was met.
4. Please complete and submit the Attestation Report by checking the box next to the relevant finding and 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

Summer Food Service Program (SFSP) outreach was not conducted for Summer 2021. SFAs must inform families about the availability and location of free meals under the Summer Food Service Program (SFSP), even if their school does not participate in the SFSP. HCNP sends an email to SFAs prior to the summer break to assist with meeting this requirement.

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 (SFSP).
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



SNP Administrative Review Findings

Volcano School of Arts & Sciences (2409-1)

Program Year 2022

appropriate staff.

4. Training documentation should 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.

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.



SNP Administrative Review Findings

Volcano School of Arts & Sciences (2409-1)

Program Year 2022

Keakealani Middle School (705-PCS)

99-128 Old Volcano Rd
Volcano, HI 96785-0845

Month of Review: April 2022

Meal Observation: May 18, 2022

Technical Assistance

- * General Program Compliance Question: 1406.: Food Safety Inspection

The most recent food safety inspection report and placard card must be posted in a publicly visible location. The most recent food safety inspection report was not posted in a publicly visible location. The SFA posted the current food safety inspection during the meal observation. No further action is required.

Meal Components & Quantities - Keakealani Middle School (705-PCS)

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 6-8. This requirement was not met on Wednesday, April 6, 2022, and Friday, April 8, 2022, with only 1/2 cup offered.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
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.

Technical Assistance:

According to the production records provided, only 1/2 cup of corn was served on Wednesday, April 6, 2022, and only 1/2 cup of black beans were served on Friday, April 8, 2022.

Consider the following suggestions to meet the requirements:

- Always served 1/2 cup chilled vegetables with dip and 1/2 cup hot vegetables daily.
- If one vegetable is served, have a standard portion size of 3/4 cup. 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.
- Increase the portion size of each of these vegetables to 3/4 cup.

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 minimum daily amounts of fruit for breakfast. The daily minimum of 1 cup was not met on Tuesday, April 5, 2022, and Wednesday, April 6, 2022, for grades 6-8.

Corrective Action:

1. Update menus to come into compliance with the 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.



SNP Administrative Review Findings

Volcano School of Arts & Sciences (2409-1)

Program Year 2022

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

The reviewer discussed the difference between product formulation statements (PFS) and product specification sheets. HCNP provided additional resources about PFS' and child nutrition (CN) labeling via email.

An updated Child Nutrition (CN) Label was secured for the following products. The document submitted has an issue date that is more than 5 years old.

- Fish Fillet – dated 2012

Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the egg frittata. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.

A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the menu items listed below. Choose a product with this documentation in order to determine meal pattern crediting.

- Sausage served Tuesday, Wednesday & Friday-this items was not credited.

The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 5 cups was not met for grades 6-8, with only 4 ¼ cups offered.

- Tuesday- According to the Food Buying Guide, 1 whole orange (138 count) credits as ½ cup fruit and juice.
- Wednesday- According to the Food Buying Guide, 1 fresh banana credits as ½ cup of fruit.

Consider serving ½ cup fresh, frozen, or canned fruit daily along with ½ cup 100% full-strength juice to meet fruit requirements.

General Program Compliance - Keakealani Middle School (705-PCS)

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

Finding 9000: Other Finding

Results of on-site monitoring must be reviewed with the meal counter who was reviewed and any other staff who were reviewed during the on-site monitoring review. Ensure that the reviewed staff members sign and date the On-Site Monitoring Review Checklist (MC-7).

The Meals in the Classroom Monitoring Checklists submitted indicate that follow-up monitoring is required. Also, some of the monitoring checklists were not completed in their entirety.

- 9th Multi-classroom indicated that:
 - o Signage on what makes up a reimbursable meal is not easily found in the classroom
 - o Teacher/staff do not understand all the components required for a reimbursable meal.
 - o Indicated that follow-up is needed; however, no follow-up review form was submitted.
- 2nd Classroom indicated that:
 - o Signage on what makes up a reimbursable meal is not easily found in the classroom
 - o Two milk varieties were not available; no additional information was provided.
 - o Indicated that no follow-up is needed
- 10th Bubble classroom indicated that:
 - o Teacher/staff do not understand all the components required for a reimbursable meal
 - o Teacher/staff does not check the meal delivery to ensure that all of the required components are present before serving students
 - o Two milk varieties were not available; no additional information was provided

SNP Administrative Review Findings**Volcano School of Arts & Sciences (2409-1)****Program Year 2022**

- o No teacher/staff signature
- o Indicated that follow-up is needed, however, no follow-up review form was submitted
- 3/4th Classroom indicated that:
 - o Did not answer question regarding teacher/staff understand all the components required for a reimbursable meal
 - o Two milk varieties were not available; no additional information was provided.
 - o Did not answer question regarding teacher/staff check off student name right after each reimbursable meal is served
 - o Indicated that no follow-up is needed

Corrective Action:

1. Review instructions for correctly completing the MC-7 form with the appropriate staff.
2. Create a Standard Operating Procedure (SOP) to ensure that onsite monitoring forms are completed correctly and a follow-up review occurs within 45 days if corrective action is required.
3. Train the appropriate staff on the SOP.
4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the 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.

1404. Food safety plan - written, copy available?**Finding 9000: Other Finding**

An annual review of the Food Safety Plan is required; however, the reviewer could not determine when the food safety plan was last reviewed. The food safety plan should be reviewed annually. The reviewer reminded the SFA to sign and date the "Food Safety Program Review" form included in the food safety plan document.

Corrective Action:

1. Conduct an annual review of the Food Safety Plan to ensure it remains current and compliant with USDA and HACCP requirements.
2. Sign and date the SOPs each year and update the Food Safety Plan as needed based on changes in procedures, staffing, or regulations.
3. Provide training to all relevant staff on the contents and implementation of the Food Safety Plan.
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.

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.