



## SNP Administrative Review Findings Program Year 2022

## Hawai'i Academy of Arts & Science PCS (2413-9)

### Hawai'i Academy of Arts & Science PCS (2413-9)

15-1397 Homestead Rd  
Pahoa, HI 96778

No. of Sites / Reviewed: 1 / 1

Month of Review: March 2022

Date of Review: April 4-8, 2022

Exit Conference: April 8, 2022

Due Date for Corrective Action: **August 26, 2025**

### Commendations

- \* Summary: Timely claim submission

Thank you for submitting the March 2022 claim and the requested AR documentation promptly prior to the scheduled AR.

- \* Summary: Responsiveness

Your SFA was quick to respond to emails this week and accommodate our schedule.

- \* Summary: Accommodation for virtual AR

Thank you for your patience and cooperation during this AR! We are still adjusting to conducting ARs virtually, and we appreciate learning from you during this process as we work to make improvements for future ARs.

### Technical Assistance

- \* Summary: Use of long vs. short nondiscrimination statement

Technical assistance was provided on appropriate use of the long/full version of the non-discrimination statement (NDS) versus the short version of the NDS. The long version of the NDS is available on HCNP's website. Technical assistance was also provided on appropriate use of the Web Based versus Print Format versions.

- \* Summary: Civil Rights Ethnic Data Report

Technical assistance was provided on completing the Civil Rights Ethnic Data Report (Form O-4c). Remember to include the date(s) of when annual Civil Rights training was provided to school meal program employees in question #3 on the Civil Rights Ethnic Data Report form.

- \* Summary: Local Wellness Policy Assessment

As a reminder, SFAs must conduct an assessment of the Local Wellness Policy (LWP) every 3 years, at a minimum. This is also mentioned in the SFA's LWP.

- \* Summary: Temperature logs on production records

On the production record, the yellow columns (columns 6-9) should be completed on the day of meal service. On the production records that were submitted, it appears that the time for the temperature recordings are typed in advance and are all at the same time. Do not complete the time column in advance of recording temperatures. This should be written in as it is completed on the day of meal service.

- \* Summary: Production Records

Technical assistance was provided on including more detail when completing production records:

- On the production record, for individual, PC items (such as the juice boxes and milk), use "eaches" or "pieces" as the unit of measure. For fresh produce, indicate the total amount needed (column 4 on the production record) in pounds. "Cases" or "crates" are variable units of measure that cannot be determined by individuals who are external to the food service operation.
- When indicating number of cans, remember to include the size of the can (i.e. 4 - #10 cans).

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- Review production record templates to ensure that the information is correct and consistent, and that any mathematical formulas included in the spreadsheet are working correctly.
- Separate the grade groups (K-8 vs 9-12) on the production record so that the different portion sizes are distinguishable.
- \* Summary: Child Nutrition (CN) Labels and Product Formulation Statements (PFS)

Technical assistance was provided on child nutrition (CN) labels and product formulation statements (PFS') and what types of food items require this documentation.

- \* General Program Compliance Question: 808.: Ethnic Data Report

Technical assistance was provided on completing the Civil Rights Ethnic Data Report (Form O-4c). The SFA must include the date(s) of when annual Civil Rights training was provided to school meal program employees in question #3 on the Civil Rights Ethnic Data Report.

**Suggestions**

- \* Summary: Breakfast meal service

At breakfast, reviewers observed that one kitchen staff member is responsible for assisting with meal service, meal counting and distributing the milk to students as they take a meal. At lunchtime, reviewers observed that students are able to grab their milk from a cooler at the end of the meal service line, which made meal service run more efficiently and allowed students to select their own milk choice without having to notify a staff member. HCNP recommends that the SFA consider adjusting its breakfast meal service operation to be similar to lunch meal service.

**Meal Counting & Claiming - Hawai'i Academy of Arts & Science PCS (2413-9)****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. There are discrepancies between approved documentation and observations on site: The SFA implements offer versus serve (OVS) for grades 9-12. However, the SFA received an approved waiver to allow OVS for senior high schools for SY 21-22, and the SY 21-22 NSLP renewal does not indicate that OVS is being implemented.

**Corrective Action:**

1. Revise the NSLP renewal application to demonstrate meal service procedures followed during meal services.
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.

**316. SA validated meal counts – school level meal counts consolidated correctly? Enter data.****Finding 9000: Other Finding**

The SFA and SA counts agree. However, there were two days when the daily meal count totals for lunch did not match the number of meals claimed for the main campus. For example, on March 7, 2022, the site did not mark numbers 12 and 27 on the daily meal count form at the main campus, resulting in an overclaim of 2 free lunches. On March 10, 2022, the site had an additional mark between numbers 139 and 140, and two marks on #156 on the daily meal count form at the main campus, resulting in an underclaim of 2 free lunches. The March 7th and March 10th errors offset each other. Therefore, the monthly



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claim for reimbursement matched the total number of meals claimed for March 2022. The SFA must ensure that the total number of tallies marked on the daily meal count form agrees with the total number of meals claimed daily. Any discrepancies must be documented and initialed by the site.

#### Corrective Action:

1. Create a standard operating procedure (SOP) on the SFA's meal counting and claiming procedures that will ensure an accurate meal counting and claiming system, including the name(s) and title(s) of the person(s) responsible at the SFA for ensuring compliance, include in the meal counting and claiming procedures internal controls for double checking all meal counts prior to submitting the claim for reimbursement.
2. Train the appropriate staff on the SOP.
3. Keep documentation of the training (sign-in sheet, date of training, agenda) to confirm the training took place.
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 - Hawai'i Academy of Arts & Science PCS (2413-9)

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

#### Finding 9000: Other Finding

Documentation of topics included in the annual Civil Rights training was not provided to the State Agency for review.

#### 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 the training requirement.
3. Train appropriate staff on the SOP.
4. Keep training documentation (sign-in sheet, date of training, and 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 nondiscrimination statement was not correct on the following materials:

- Procurement Plan
- Local Wellness Policy

The CEP public media notice (dated July 29, 2021) did not contain the nondiscrimination statement.

#### Corrective Action:

1. Review and revise all documents to ensure they contain the current, complete USDA nondiscrimination statement. Replace any materials that include outdated or incomplete versions. The current nondiscrimination statement is available at <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>.



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Review the document. The full statement is everything listed in the large box on the document.

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.

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#### Technical Assistance:

The current version of the non-discrimination statement must be used on all program materials. The current version of the non-discrimination statement must be used on all program materials. Technical assistance was provided on appropriate use of the long/full version of the non-discrimination statement (NDS) versus the short version of the NDS. The long version of the NDS is available on HCNP's website. Technical assistance was also provided on appropriate use of the Web Based versus Print Format versions.

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

#### Finding 9000: Other Finding

Documentation was not provided to demonstrate that the appropriate people were given the option to be involved in the development, implementation, periodic review, and update of the Local School Wellness Policy, or that the SFA reached out to potential stakeholders to participate in the development, review, and implementation 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 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 made 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.

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#### Technical Assistance:

The SFA must maintain documentation of its efforts to include the appropriate people who may be involved in the development, review, update, and implementation of the Local School Wellness Policy.

### 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.

The SFA must make updates to the local wellness policy available to the public on an annual basis, at a minimum. The wellness policy submitted and posted on the SFA website is from SY17-18.

The SFA has not completed a triennial assessment of the Local Wellness Policy.

#### Corrective Action:

1. Revise the Local Wellness Policy to align fully with all USDA requirements under the Final Rule.
2. Complete the assessment of the wellness policy.
2. Post the updated Local School Wellness Policy on the SFA's website for public access.



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3. 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:

Technical assistance provided to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool: The SFA must make updates to the local wellness policy to the public at a minimum on an annual basis.

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

#### Finding 9000: Other Finding

Program outreach was completed for SY 21-22 to notify families that breakfast and lunch are available to students free of charge under the National School Lunch Program (NSLP) and School Breakfast Programs (SBP). Since the SFA is approved to operate under the Seamless Summer Option (SSO) during SY 21-22, program outreach should have mentioned that meals are available to students at no cost under the SSO program for SY 21-22. Program outreach was conducted appropriately for CEP.

#### Corrective Action:

1. Create a standard operating procedure (SOP) on how the SFA will ensure households are correctly notified about the availability of free school meals through the Seamless Summer Option (SSO) program prior to, or at the beginning of the school year, including steps to ensure that the current program information is identified.
2. Train all appropriate staff on the SOP.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

NOTE: This will be reviewed during the next Administrative Review to ensure corrective actions have been implemented by the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

## IX Special Provision Options - Hawai'i Academy of Arts & Science PCS (2413-9)

### 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 the 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 Hawaii Academy of Arts & Science (HAAS) 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 HAAS PCS' SY 21-22 AR.

HAAS PCS started a new CEP cycle (district-wide) in SY 2024-2025. A new ISP was established and validated by the State Agency at the time of application, effective SY 24-25.



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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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#### Campus (HAAS Main Site(K-12) (561-PCS)

15-1397 Homestead Rd  
Pahoa, HI 96778

Month of Review: March 2022

Date of Onsite Review: April 4-8, 2022

Meal Observation: April 7, 2022

#### Technical Assistance

- \* Meal Components & Quantities Question: 407.: Vegetable subgroups

On the review day, carrots were substituted for the garden salad. When substitutions are made, the SFA should substitute a vegetable within the same subgroup to ensure that the weekly subgroups are met.

#### Meal Components & Quantities - Campus (HAAS Main Site(K-12) (561-PCS)

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

#### Finding 9000: Other Finding

The daily minimum vegetable requirement must be met for each grade group. 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 Tuesday (3/8/22) and Thursday (3/10/22).

- On Tuesday, 5/8 cup of vegetables were offered. 1/4 cup from the romaine, 1/4 cup cucumber and 1/8 cup carrots.
  - o Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are credited at half the volume served. Therefore, the 1/2 cup serving of romaine is credited as 1/4 cup dark green vegetable. The production record listed 1 each for the cherry tomatoes which is not large enough to credit towards the vegetable component.
- On Thursday, 5/8 cup of vegetables were offered. 1/2 cup from the broccoli and corn (combined) and 1/8 cup from the vegetables in the Pork adobo.

Consider the following suggestions:

- On Tuesday, increase the salad to a 1 cup portion (to provide a 1/2 cup creditable portion of dark green vegetable) and offer 3 cherry tomatoes (to provide 1/4 cup red/orange vegetable) to meet the minimum daily vegetable requirement of 3/4 cup for grades K-8.
- On Thursday, consider increasing the broccoli or corn to 1/2 cup portion size.

The weekly minimum vegetable requirement must be met for each grade group. The weekly minimum of 3 3/4 cups was not met for grades K-8, with only 3 1/2 cups offered during the review period (3/7/22-3/11/22)

The daily minimum vegetable requirement must be met for each grade group. Federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12. This requirement was not met on Tuesday (3/8/22), Thursday (3/10/22), and Friday (3/11/22).

- On Tuesday, 5/8 cup of vegetable was offered. 1/4 cup from the romaine, 1/4 cup cucumber and 1/8 cup carrots.
  - o Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are credited at half the volume served. Therefore, the 1/2 cup serving of romaine is credited as 1/4 cup dark green vegetable. The production record listed 1 each for the cherry tomatoes which is not large enough to credit towards the vegetable component.
- On Thursday, 5/8 cup of vegetables were offered. 1/2 cup from the broccoli and corn (combined) and 1/8 cup from the vegetables in the Pork adobo.
- On Friday, 3/4 cup of vegetables were offered.

Consider the following suggestions:

- On Tuesday, increase the salad to a 1 cup portion (to provide 1/2 cup creditable portion of dark green vegetable) and offer 3 cherry tomatoes and 1/4 cup of carrots (to provide 1/2 cup red/orange vegetable) to meet the minimum daily vegetable

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requirement of 1 cup for grades 9-12.

- On Thursday, consider increasing the broccoli and corn to ½ cup portion size.
- On Friday, consider increasing the bean salad to ½ cup portion size.

The weekly minimum of 5 cups of vegetables was not met for grades 9-12, with only 4 cups of vegetables being offered during the review period (3/7/22-3/11/22).

**Corrective Action:**

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

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

**Finding 9000: Other Finding**

The minimum daily fruit requirement must be met for each grade group. Federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on all days, with only 1/2 cup of fruit being offered.

The weekly minimum fruit requirement must be met for each grade group. Federal regulations require minimum weekly amounts for fruit. The weekly minimum of 5 cups was not met for grades 9-12, with only 2 5/8 cups offered during the review period (3/7/22-3/11/22).

- Ensuring the 1 cup daily requirement is offered daily will meet weekly requirements.

**Corrective Action:**

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete 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 minimum daily grain requirement must be met for each grade group. Federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent grain requirement for grades 9-12. This requirement was not met on Monday (3/7/22), Wednesday (3/9/22), and Thursday (3/10/22).

- Monday (3/7/22) – a recipe analysis of the brioche bun determined that the brioche bun provided 1.5 oz. eq. of grains. Consider making a slightly larger bun to contribute 2 oz. eq. grains.
- Wednesday (3/9/22) - the penne pasta provided 1 oz. eq. grain and the roll provided .75 oz. eq. grain. Consider serving this grade group ¾ cup of pasta to provide 1.5 oz eq. grain or make a larger roll that provides 1 oz. eq. per serving.
- Thursday (3/10/22) -the Hapa rice provided 1 oz. eq. grain and the roll provided 0.75 oz eq. grain. Consider serving this grade group a ¾ cup portion size of hapa rice in addition to the roll to provide a 1.5 oz eq. grain of hapa rice and a 0.75 oz eq. whole grain roll (total 2.25 oz eq. grain for the week).

**Corrective Action:**

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





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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 production records are incomplete, and not all required fields are correctly documented.

- Serving sizes documented on production records were not always clear and complete.
  - o Monday, 3/7/22 – the broccoli and carrots had a portion size of  $\frac{1}{4}$  cup, but the utensil shows a 4 oz. spoodle, which would be a  $\frac{1}{2}$  cup portion.
  - o Monday 3/7/22 – the potatoes have a portion size of  $\frac{1}{2}$  cup; however, the utensil is shown as a 2 oz. spoodle, which is only  $\frac{1}{4}$  cup.
  - o Monday 3/7/22 - the production record notes that 90/10 ground beef was used in the Sloppy Joe. The NSLP Director confirmed that this is not correct.
  - o Wednesday 3/9/22 - the broccoli and carrots both had a portion size listed as  $\frac{1}{4}$  cup, but the utensil is shown as 4 oz.
- Meal component contribution amounts were often incorrect.
  - o Tuesday, 3/8/22 - the pizza had a contribution listed as 2 oz meat and 2 oz. grain. However, the recipe provided indicates that the contribution is 3 oz meat and 2.25 oz grain.
  - o Tuesday 3/8/22 - the cherry tomato has a portion size of 1 each and a contribution of  $\frac{1}{4}$  cup; however, per the Food Buying Guide, 3 each are needed to provide  $\frac{1}{4}$  cup credit.
  - o Thursday 3/10/22 –  $\frac{1}{2}$  cup of Hapa rice credits as 1 oz eq grain (not 2 oz eq).
  - o Friday, 3/11/22 - the cucumbers had a contribution of  $\frac{1}{4}$  oz listed and should be a cup amount. The carrot sticks show 2 each have a contribution of  $\frac{1}{4}$  cup; however, per the Food Buying Guide, 3 sticks are needed to reach a  $\frac{1}{4}$  cup vegetable equivalent.
- Menu items and serving sizes were not always documented and clear for each grade group.
  - o Friday 3/11/22 – Per the CN label, 1 fish patty credits as 1.5 oz eq M/MA and 1 oz eq grain.
  - o Grades are combined into grade groups that are not appropriate to meet meal pattern requirements. Grades 6-8 and 9-12 have different requirements and should not be combined on the production record. Clear sizes for each grade group should be separated on the record.

##### Corrective Action:

1. Provide training on correctly completing daily production records for the meals produced and served to all kitchen staff.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.
3. Maintain accurate and complete production records for the meals produced and served, which correctly identify meal components served, including portion sizes and crediting information for each age/grade group 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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410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

**Finding 9000: Other Finding**

The recipes submitted were not always written in standardized format with complete information. A standardized recipe is a recipe that has been carefully adapted and tested to ensure the recipe will produce a consistent product each time it is prepared.

• Items on the menu that need standardized recipes include the following:

- o Pork adobo- review this recipe for accuracy. The yield is listed as 200 with K-8 getting 2 oz and 9-12 getting 3 oz, but it is unclear which yield this portion size is for. The amount of pork in the recipe for 150 pounds produces 1296 creditable oz of meat. When divided by the number of servings of 200 this comes out to 6.48 oz per serving, which seems high. Kitchen test this recipe and ensure the amount is correct for the yield and portion provided.
- o Brioche Roll - review this recipe for accuracy. At the top it is noted that buns have a yield of 176 and Rolls 350. The total amount of creditable grams of grain in the recipe is 305g.  $305/176 = 1.7$  which rounds down to 1.5 oz eq. grain. The recipe claims at the bottom 3.25 oz eq. and the production record has a component contribution of 1.75 oz.

**Corrective Action:**

1. Update and maintain standardized recipes that meet USDA meal pattern documentation 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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**Technical Assistance:**

Standardize the recipes so that true yields and portion sizes can be determined. To be standardized recipes, recipes must include at a minimum the following:

- o All ingredients in the recipe.
- o Correct volume or weighted measure of each ingredient.
- o Serving/portion sizes for each grade group.
- o The true yield made by the recipe.
- o Clear and complete preparation steps and directions.

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

**Finding 9000: Other Finding**

The SFA is not maintaining current Child Nutrition (CN) Labels for all processed items. The CN Label submitted for the fish patty showed an issue date of March 2015. The CN number was not active on the USDA CN Label Verification Report.

**Corrective Action:**

1. Secure and maintain updated Child Nutrition (CN) labels and Production Formulation Statements (PFS) for all processed and/or combination items that meet USDA meal pattern documentation 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 9000: Other Finding

The weekly vegetable subgroup requirements must be met for each grade group during the review period (3/7/22-3/11/22). The ½ cup weekly beans/peas/lentils vegetable subgroup requirement was not met for grades K-12, with only 1/8 cup offered.

- The only beans/peas/or lentils that could be credited this week were from the bean salad on Friday (3/11/22).
- Consider offering ½ cup of baked beans with the fish sandwich or modifying the bean salad recipe to have a ¾ cup portion size with ½ cup of the beans coming from the beans/peas/lentil subgroup.

#### Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete 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 weekly vegetable subgroup requirements must be met for each grade group during the review period (3/7/22-3/11/22). The 1 ¼ cup weekly red/orange vegetable subgroup requirement was not met for grades 9-12, with only 1 cup offered.

- Consider increasing the portion size of the carrots and tomatoes on Tuesday and carrots on Friday to help meet the weekly red/orange vegetable subgroup requirement.

#### Corrective Action:

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

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 weekly minimum amounts of the combined grain and meat/meat alternate component to be served. The minimum weekly requirement of 7 oz. eq. for grades K-5, and 8 oz eq. for grades 6-8 was not met. During the review period 3/7/22-3/11/22), a minimum of 5.25 oz. eq. of grain was offered throughout the week.

The federal regulations require weekly minimum amounts of the combined grain and meat/meat alternate component to be served. The weekly requirement of 9 oz. eq. for grades 9-12. During the review period (3/7/22-3/11/22), a minimum of 6.75 oz. eq. of grain was offered throughout the week.

According to the production records, it appears that cereal is offered daily. While this meets the daily 1 oz. eq. requirement for grains, offering only 1 oz. eq. of grain daily does not meet the minimum weekly requirement.

Please note that the final rule that went into effect as of July 1, 2024, establishes a combined grains and meats/meat alternates meal component in the SBP and removes the requirement for schools to offer 1.0 ounce equivalent of grains each day at breakfast. Schools may offer grains, meats/meat alternates, or a combination of both to meet the minimum ounce equivalent in this combined meal component requirement.

**SNP Administrative Review Findings****Hawai'i Academy of Arts & Science PCS (2413-9)****Program Year 2022****Corrective Action:**

1. Complete trainings on the USDA 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 the appropriate staff.
3. Create a Standard Operating Procedure (SOP) to ensure that menu documentation is completed accurately and documents the meals planned, prepared, and served for reimbursement.
4. Provide training to all relevant staff on the contents and implementation of the new SOP.
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.

**Technical Assistance:**

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

**General Program Compliance - Campus (HAAS Main Site(K-12) (561-PCS)***811. Justice for All poster displayed in prominent location?***Finding 9000: Other Finding**

An outdated version of the "And Justice for All: poster was displayed at the Main Campus. This was corrected onsite during the schedule review and verified via video.

**Corrective Action:**

Corrected onsite - no further action is required.

**Technical Assistance:**

The current "And Justice for All" poster must be displayed

*1300. Potable Water – free and available to all students, lunch and breakfast?***Finding 9164: Free potable water not available during lunch meal service**

Free potable water is not available to all students for lunch at the main campus, where lunches are served during the meal service.

**Corrective Action:**

1. Create a Standard Operating Procedure (SOP) that ensures free potable water is available in the meal service area or immediately adjacent to the meal service area.
2. Train the appropriate staff on the SOP.
3. Keep training documentation on file (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.

**Technical Assistance:**

The SFA explained that water is made available on the campus grounds and in classrooms, however, at the Main Campus, potable water was not made available where lunches are served. Per USDA regulations, schools must make potable water available and accessible without restriction to children at no charge in the place(s) where lunches are served during meal service.



## SNP Administrative Review Findings Program Year 2022

## Hawai'i Academy of Arts & Science PCS (2413-9)

### Other Federal Programs - Campus (HAAS Main Site(K-12) (561-PCS)

1905. FFVP: Widely publicized within the school?

#### Finding 9000: Other Finding

Documentation was not provided to indicate that the FFVP program is widely publicized within the school. A "Today's Snack" sign was provided which does not indicate that it is part of the Fresh Fruit and Vegetable Program and separate from the NSLP and SBP.

#### Corrective Action:

1. Ensure that the SFA is now publicizing the Fresh Fruit and Vegetable Program by hanging the FFVP banner in a prominent location on campus that is visible to the public. Ensure that the FFVP banner is hung in an area that protects it from wind damage.
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.

**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.**