



SNP Administrative Review Findings Program Year 2023

Ka 'Umeke Ka'eo Public Charter School (2410-4)

Ka 'Umeke Ka'eo Public Charter School (2410-4)

113 Kuawa St
Hilo, HI 96720-4815

No. of Sites / Reviewed: 3 / 1

Month of Review: February 2023

Dates of Review: March 30 – April 6, 2023

Exit Conference Date: April 6, 2023

Due Date for Corrective Action: **August 25, 2025**

Commendations

- * Sponsor: Live Streaming

The SFA did a good job with live streaming and recording of meal preparation and meal service.

- * Sponsor: Communication

There was good communication – the SFA worked quickly to submit requested documentation and passed our questions/comments to the meal vendor in a timely manner.

General Program Compliance - Ka 'Umeke Ka'eo Public Charter School (2410-4)

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

Finding 9000: Other Finding

Civil Rights training documentation was submitted for the manager. No other training documentation was submitted to demonstrate all appropriate staff were trained on Civil Rights in school year 2022-2023. All appropriate staff must be trained in Civil Rights annually. Training documentation must be maintained.

Corrective Action:

809. 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.
810. 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.
811. Train all appropriate staff on the SOP.
812. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
813. 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 Civil Rights Complaint Log was not submitted. The SFA must maintain a Civil Rights Complaint Log for each school year. Annually, the Civil Rights Complaint Log should be reviewed.

Corrective Action:

1. Create and implement a Complaint Log for each school year.

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2. Annually review and update the Complaint Log.
3. Maintain on file the Complaint Log.
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**

The SFA did not provide documentation to show racial and ethnic data is collected. The collection of race and ethnicity data is a requirement for federally assisted programs like school nutrition programs to ensure compliance with Title VI of the Civil Rights Act of 1964.

Corrective Action:

1. Create a SOP on how the SFA will ensure racial and ethnic data will be collected annually.
2. Collect racial and ethnic data.
3. Maintain on file racial and ethnic data.
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**

The SFA did not submit their Civil Rights Complaint Procedure. SFAs are required to have a Civil Rights Complaint procedure in place detailing how the SFA will proceed when a civil rights complaint is received.

Corrective Action:

1. Create and implement a Civil Rights Complaint Procedure. HCNP has a Civil Rights Complaint Procedure Flowchart and a Non-discrimination Procedures posted on HCNP's website for SFAs to use and include in their Civil Rights binder.
2. Annually review and update the Complaint Procedure.
3. Maintain on file the Complaint Procedure.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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810. Non-discrimination on appropriate Program materials?

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The non-discrimination statement included in the public release was incorrect. The public release contained the short version of the non-discrimination statement, whereas the long version is required.

Corrective Action:

1. Review and revise the public release to ensure the long non-discrimination statement is utilized. Replace any materials that include incomplete versions.
2. Maintain documentation on file confirming that all relevant materials have been updated with the correct nondiscrimination statement.
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 9000: Other Finding**

All School Food Authorities (SFAs) are required to maintain a current and compliant Local School Wellness Policy. During the Administrative Review, it was determined that the policy on file is not fully compliant with USDA requirements and is missing the following components:

- Designation of a Wellness Coordinator
- Stakeholder participation in the development, implementation, and review of the policy
- Nutrition guidelines for all foods and beverages sold on campus
- Policies on food and beverage marketing
- Nutrition promotion strategies
- A process for evaluation of policy implementation and effectiveness
- Communication of the policy to the public

Corrective Action:

1. Designate one or more SFA and/or school officials who have the authority and responsibility to ensure each school complies with the Local Wellness Policy.
2. Revise the policy to include all required components listed above to bring it into compliance with USDA regulations.
3. Ensure the updated wellness policy is made available to the public (e.g., via the district website, newsletters, or school board meetings).
4. Keep records on file showing that the policy was updated and made accessible to households.
5. 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**

It was found that the LEA has not assessed the implementation of the Local School Wellness Policy. LEAs must conduct an assessment of the wellness policy every 3 years, at a minimum. This assessment will determine: compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the

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wellness policy. The LEA has not made the results of the most recent assessment of the Local School Wellness Policy available to the public.

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 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.

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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 demonstrating stakeholder involvement in the review and update of the Local School Wellness Policy. The SFA did not include the required stakeholders in this process. USDA regulations require that potential stakeholders—including parents, students, school food service staff, teachers, school administrators, and members of the general public—be made aware of their opportunity to participate in the development, review, update, and implementation of the Local School Wellness Policy.

Corrective Action:

1. Develop a process to ensure the general public and other required stakeholders are informed of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy.
2. Actively communicate this opportunity using appropriate channels (e.g., school websites, newsletters, emails, or public meetings).
3. Keep records confirming that the public has been informed about participation opportunities (e.g., announcements, meeting notices, outreach materials).
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1213. Validate OFS #1203 - Did new Director meet food safety certification and training requirements?**Finding 9000: Other Finding**

The new School Nutrition Program Director did not complete food safety training within 30 days of being hired, and no previous food safety certification was obtained in the last 5 years.

Corrective Action:

1. The School Nutrition Program Director must complete food safety training.
2. Keep training documentation (certificate) to confirm that training was completed.
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
*Program Year 2023***Ka 'Umeke Ka'eo Public Charter School (2410-4)***1214. Validate OFS #1204 - Did the School Nutrition Director meet annual training requirements?***Finding 9000: Other Finding**

The Nutrition Program Director did not meet the professional standards training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

The Nutrition Program Director is required to complete a minimum of 12 training hours per year. Training may be obtained in person, online, through local meetings, webinars, conferences, etc.

Corrective Action:

1. Annually, the Nutrition Program Director must complete a minimum of 12 hours of training relevant to their role and responsibilities.
2. Maintain documentation on file to verify the completion of the required 12 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. 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 school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Corrective Action:

1. Each year, the School Nutrition Program Personnel will receive the required training related to their job duties.
2. Create a standard operating procedure (SOP) detailing how all school nutrition employees at the SFA level and at the school level have met the required professional standards training hours requirement annually. Include in the procedures 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 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. Records that list the employee name, employer/school, 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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1217. Frequency of tracking training hours



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Program Year 2023

Finding 9000: Other Finding

The SFA does not currently have a system or tool in place to track professional development hours. To ensure compliance with USDA regulations, the SFA must maintain accurate records of training hours completed by all School Nutrition Program staff. For additional guidance, please refer to the USDA's Guide to Professional Standards for School Nutrition Programs.

Corrective Action:

1. Develop a tool that aligns with USDA requirements to accurately track the annual training hours for all school nutrition staff.
2. Consistently record all training hours and relevant details in the SFA's official training log to ensure accurate and complete documentation.
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 9142: The written food safety plan does not contain all the required elements.

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements: Standard Operating Procedures

Corrective Action:

1. Create Standard Operating Procedures (SOPs) and add them to the food safety plan. HCNP has SOPs that SFAs may use and include in their food safety plan.
2. Sign and date the SOPs annually to show an annual review was completed.
3. Train all appropriate staff on the SOPs.
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.

1500. Reports submitted to State agency as required?

Finding 9000: Other Finding

All awarded equipment at Ka 'Umeke Kā'eo (listed in the chart below) requires completion of the USDA SF-428S form.

| | |
|---------------------------|---|
| 2014 NSLP Eq. Award Grant | eTrition POS – Harris Solutions \$8,159 |
| 2014 NSLP Eq. Award Grant | Surface Pro computer \$1,730 |
| 2017 NSLP Eq. Award Grant | TurboAir - Milk Cooler \$3,675 |
| 2023 NSLP Eq. Award Grant | True TMC49 - Milk Cooler Serial # 10970353 \$4,223 |

The USDA SF-428S form is provided with an example entered. This form must be completed and maintained for both internal records and submission to the HCNP to ensure proper documentation and compliance with federal equipment oversight requirements.

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1. The SFA must complete the USDA SF-428S form for all of the awarded equipment at Ka 'Umeke Kā'eo, including all required information for any equipment still in operation such as item description, serial number, location, acquisition cost, and condition. If any equipment is no longer working, please note on the equipment description line when (year) it was disposed.
2. Ensure the completed form is kept on file and updated as needed to reflect any changes in the equipment's status or condition. These records must be readily accessible for review.
3. Submit a copy of the completed USDA SF-428S form to HCNP as part of the required documentation process for awarded equipment.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1501. Records retained for 3 years?**Finding 9000: Other Finding**

The requested photos demonstrating that program documents are being maintained on-site for the required retention period were not submitted. Federal regulations require SFAs to retain documentation for at least three years plus the current school year, or until the resolution of any audits, whichever is longer. If the SFA follows Hawaii Department of Education (DOE) guidelines, documentation must be retained for six years plus the current year.

Corrective Action:

1. Ensure that all program documentation is retained in accordance with federal and state regulations:
 - a. Federal Requirement: Retain documents for at least three years plus the current school year, or until the resolution of any audits, whichever is longer.
 - b. Hawaii DOE Requirement: Retain documents for six years plus the current year.
2. Implement or update an internal system to track the retention of program documents. This system should ensure that all documentation is kept for the appropriate length of time and is accessible for future audits or reviews.
3. Provide training for relevant staff on proper documentation retention procedures, including the retention periods required by both federal and Hawaii DOE guidelines.
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**

Upon review of the Summer Food Service Program (SFSP), it was found that the SFA is not informing eligible families regarding the availability and location of free meals for students via the SFSP.

Corrective Action:

1. Create a SOP on how the SFA will inform households annually regarding the availability and location of free meals for students via the Summer Food Service Program.
2. Train all appropriate staff on the SOP.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.



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Ka 'Umeke Ka'eo Public Charter School (2410-4)

Program Year 2023

4. 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 - Ka 'Umeke Ka'eo Public Charter School (2410-4)

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 Ka Umeke PCS to establish new ISPs for SY 2024-2025 (in other words, SY 24-25 will be Ka Umeke Ka'eo 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 Ka Umeke Ka'eo 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 longer per the SFA's requirements. If audit findings have not been resolved, these records must be retained beyond the 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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Ka 'Umeke Ka'eo Public Charter School (2410-4)

Ka 'Umeke Ka'eo PCS- Pa Hoaka (562-PCS)

113 Kuawa St
Hilo, HI 96720-4815

Month of Review: February 2023

Date of Onsite Review: March 30, 2023

Technical Assistance

* Meal Components & Quantities Question: 500.: Offer Versus Serve

Provided OVS technical assistance. Prior to the day of review, everything was bundled/pre-plated except the milk. Explained to the SFA that either the fruit or vegetable needs to be separate as well. Under offer vs serve (OVS), students must select 3 full meal components, and one must be 1/2 cup of fruit or vegetable (or a combination of both). Bundled/pre-plated meals should contain the minimum for meeting offer vs. serve requirements. For example: pre-plated meals should contain only 3 components, one of which is either the fruit or vegetable. The SFA stated that she informed the vendor and this will be implemented going forward. On the day of review, the fruit and milk were offered; the ham and cheese sandwich and baby carrots were bundled.

* Meal Counting & Claiming: Edit Checks

On the edit checks, the attendance factor is not correct and is listed as 73.20. The attendance factor on the edit checks should be changed to 96.50 to accurately reflect the attendance adjusted eligible students.

* Meal Vendor

Create a recipe when more than one ingredient is used for a menu item (examples: green beans and carrots, tossed salad). Use the USDA Food Buying Guide Recipe Analysis Workbook (RAW) to determine the crediting of recipes.

Discussed the Preparation Yield column of the RAW. This column is used when you need to convert the food item to the form that is listed under the "Food As Purchased, AP" column.

Refer to the USDA Food Buying Guide to verify the amount that needs to be served to meet the meal pattern requirements (examples: one orange 113 count size = about 5/8 cup fruit and liquid; one banana 7 to 7-7/8 inches long = 1/2 cup fruit).

The USDA Food Buying Guide has a tool called, Shopping List. This tool helps to calculate how much of an item to purchase or the amount that is needed after entering the serving size and number of servings into the tool. Pay careful attention to the food item description. For example, when selecting canned fruit, pay attention to the can size and what is being served (fruit and liquid versus drained fruit). It is important to select the correct option because making the wrong selection will affect the calculation.

Contact the manufacturer directly to obtain Product Formulation Statements if the vendor is not able to provide it. If there is no Product Formulation Statement for the product, serve a different product that is creditable.

* Offer versus Serve

Under offer vs serve (OVS), students must select 3 full meal components, and one must be 1/2 cup of fruit or vegetable (or a combination of both). Bundled/pre-plated meals should contain the minimum for meeting offer vs. serve requirements. For example: pre-plated meals should contain only 3 components, one of which is either the fruit or vegetable.

The SFA explained that 4 out of the 5 meal components are bundled/pre-plated and students have the option to select milk. This is not considered true OVS. Have either the fruit or the vegetable separate at lunch for grades 9-12. It does not necessarily have to be the fruit every day. Some days, it could be fruit and some days it could be the vegetable that is separate.

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During the observation of lunch preparation on April 5, 2023, oranges are cut in half for preschoolers and whole oranges are provided to all other grades. Serving a preschooler half an orange is difficult for a preschooler to eat. Suggest cutting the orange into additional slices/wedges. Also, for all other grades, cut the whole oranges into wedges so it is easier for them to eat and they are more likely to eat it.

*** Lunch Service (grades 6-12)**

Prior to meal service, the SFA explained that the middle school students come through the line first, followed by the high school students. On the day of review, the students did not come in this order. The SFA explained that students who order a meal in the morning are given a colored token. There are different color tokens for each class. The students bring the token with them to the lunch line to give to the staff at the beginning of the line. Then the students pick up their food items and proceed to the meal clerk. Although it appeared that the meal clerk knew which students were in middle versus high school, HCNP suggests the students show the staff at the beginning of the line that they have a token, pick up their lunch, and then give the token to the meal clerk so the meal clerk knows whether the student is in middle or high school and ensures each student is taking a reimbursable meal.

*** Breakfast and Lunch Meal Counting Checklist(Kai Kohala)**

Suggest making separate tabs for each month of the school year. Also, have the spreadsheet total the meal counts for breakfast and lunch for each month. The SFA can then compare the total from the spreadsheet and compare it to the POS system and Edit Check Worksheet to double check the meal count totals match.

Meal Counting & Claiming - Ka 'Umeke Ka'eo PCS- Pa Hoaka (562-PCS)

321. DOR meal counts compared to Review Period daily meal counts - Review Period counts reasonable compared to DOR meal counts? Enter data.

Finding 9000: Other Finding

No documentation was provided to explain why the Day of Review (DOR) breakfast counts were significantly low. Proper documentation should be maintained to clarify any discrepancies in meal counts.

Corrective Action:

1. Update the system for tracking meal counts, ensuring that any discrepancies are promptly identified and documented. This system should be reviewed regularly to prevent similar issues in the future.
2. Provide training for all relevant staff on proper meal count procedures and how to document any issues or irregularities. Ensure staff are aware of the importance of accurate reporting and timely resolution of any discrepancies.
3. Monitor meal counts closely during future reviews and ensure that any discrepancies are addressed immediately. Submit documentation explaining any future irregularities in meal counts, if applicable.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Meal Components & Quantities - Ka 'Umeke Ka'eo PCS- Pa Hoaka (562-PCS)

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

Finding 9000: Other Finding

Subgroups of vegetables must be met for each grade group. During the review period (2/6/23-2/10/23), the ½ cup weekly beans/peas/lentils vegetable subgroup requirement was not met for grades 4-8 & 9-12, with only 3/8 cup offered.



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Consider one of the following suggestions to help meet this requirement.

- Increase the amount of beans used in the chili con carne to 3.25 cans kidney beans for 60 servings. Per the Food Buying Guide, each #10 can of kidney beans provides 9-5/8 cup beans. In order to provide at least 1/2 cup beans per serving, at least 30 cups beans would be needed. $30/9-5/8 = 3.11$ #10 cans.
- Add 1/8 cup black beans or chickpeas to the tossed salad on Tuesday.

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.

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

Finding 9000: Other Finding

The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. This requirement was not met on Monday, 2/6/2023, with only 1.5 oz. eq. offered.

The recipe for the smokin BBQ Chicken was written to be used with chicken breast. However, chicken thighs were used, per the labeling submitted. Per the Food Buying Guide, chicken thighs have more loss when cooked, and thus credit lower. If chicken breasts had been used, the recipe would have credited as 2 oz. eq. meat/meat alternates. However, because chicken thighs were used, the recipe only provided 1.7 oz. eq., rounded down to 1.5 oz. eq. meat/meat alternates per serving.

Either always make this recipe with chicken breast, or create a new recipe using chicken thighs, that takes into account the loss per the Food Buying Guide. For 100 2-oz. eq. portions, 19.8 lbs of chicken thighs would need to be used.

The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 10 oz. eq. was not met for grades 9-12. The menu offered a minimum of 9.5 oz. eq. of meat/meat alternate throughout the week.

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.

501. Cafeteria staff trained on OVS?

Finding 9000: Other Finding

Documentation was not submitted to demonstrate that cafeteria staff have been trained on Offer versus Serve (OVS) procedures. It is essential for staff to be properly trained to ensure compliance with the OVS guidelines.

Corrective Action:

1. Train cafeteria staff on OVS.
2. Implement a system to track all staff training, ensuring that future training sessions are documented and accessible for

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review. This should include details on the training content, dates, and staff attendance.

3. After training, the SFA should monitor cafeteria staff's implementation of OVS to ensure ongoing compliance.

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.

502. DOR - Signage explaining OVS reimbursable meal near/at beginning of service line?**Finding 9080: No signage explaining what constitutes a reimbursable meal under Offer vs. Serve.**

Although OVS is implemented for grades 9-12 during lunch, signage explaining the OVS requirements was not posted. While HCNP can send a poster detailing the items that must be selected for a reimbursable meal, the SFA is also required to post additional signage indicating where each menu item belongs within each meal component for that specific day.

Corrective Action:

1. The SFA must post clear signage in the cafeteria that outlines the OVS requirements, specifically where each menu item belongs within the meal components (e.g., fruit, vegetables, grains, meat/meat alternate, and milk).
2. Ensure that the signage aligns with the daily menu offerings, clearly showing where each item fits within the required meal components for that particular day.
3. Provide training for relevant cafeteria staff to ensure they understand OVS requirements and how to guide students in selecting a reimbursable meal. Staff should also be aware of the importance of maintaining and updating the signage as needed.
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.

General Program Compliance - Ka 'Umeke Ka'eo PCS- Pa Hoaka (562-PCS)**811. Justice for All poster displayed in prominent location?****Finding 9000: Other Finding**

The And Justice for All Poster is currently displayed near the meal service line on a bulletin board; however, the version posted is outdated. USDA regulations require that the most current version of the And Justice for All nondiscrimination poster be prominently displayed in all areas where program services are provided.

Corrective Action:

1. Post the updated And Justice for All Poster near the meal service line.
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.



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

Finding 9000: Other Finding

Each school year, SFAs operating the NSLP in more than one school are required to conduct on-site reviews of the meal counting and claiming system, as well as readily observable general areas, at each site operating NSLP, and at 50% of sites operating the SBP.

The SFA did not meet the monitoring requirement for lunch, as only one on-site review was completed (Kai Kohola). However, the SFA did meet the monitoring requirement for breakfast, with two reviews completed (Kai Kohola and Lamalama).

Corrective Action:

1. Conduct and document the required on-site lunch reviews for all sites. These reviews must evaluate the meal counting and claiming system and observe general areas as required.
2. Develop and implement an annual monitoring schedule to ensure that all required on-site reviews for both NSLP and SBP are completed within the required timeframe each school year.
3. Maintain all on-site review documentation on file for the required retention period to demonstrate ongoing compliance during administrative reviews.
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.

1405. Food safety inspection dates?

Finding 9000: Other Finding

SFAs are required to ensure that each participating school receives at least two food safety inspections each school year. The SFA has not received two inspections during the current year and did not receive two inspections during the previous year. The SFA did not request two food inspections from the local health department. If two inspections are not received, the SFA must request to have two inspections completed and must maintain documentation of the request to be in compliance.

Corrective Action:

1. Request two food inspections from the local health department annually.
2. Keep documentation on file that two food inspections were requested from the local health department.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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 9000: Other Finding

Temperature logs were not submitted for review. SFAs are required to maintain temperature logs for all refrigeration, freezer, and hot-holding equipment used in the storage and service of school meals. These logs are critical for ensuring food safety and compliance with USDA and local health regulations.

Corrective Action:

1. Maintain daily temperature logs going forward. Logs must be consistently completed, reviewed by a designated staff



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member, and kept on file for the required documentation retention period.

2. Train all relevant staff on the importance of daily temperature checks and accurate recordkeeping. Training should include how to take temperatures properly and what actions to take if temperatures fall outside safe ranges.

3. Establish a procedure to regularly monitor and verify that temperature logs are being completed and reviewed. This could include periodic supervisor checks or internal audits.

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.

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.