



SNP Administrative Review Findings

Kaohao PCS (1436-2)

Program Year 2022

Kaohao PCS (1436-2)

140 Alala Road
Kailua, HI 96734-3125

No. of Sites / Reviewed: 1 / 1

Month of Review: March 2022

Date of review: April 25-29, 2022

Exit Conference Day: April 29, 2022

Due Date for Corrective Action: July 29, 2025

Commendations

* Summary: Commendations.

Staff did a good job of submitting the documentation via Dropbox.

Staff were quick to respond to questions and provided additional information as requested.

* Summary: Commendations.

We appreciate your flexibility during the HCNP's virtual Administrative Review, recording meal service operations, and submitting the numerous documents via the Dropbox links.

The signage at the beginning of the serving line with pictures of the menu items was very nice!

SFA is implementing First In and First Out (FIFO) with the milk.

SFA is reviewing the Food Safety Plan annually.

Technical Assistance

* Verification Question: 209.: Error-Prone

Although, the verified application was error prone, the SFA indicated on the FNS-742 that there were no error prone applications. Technical assistance provided on how to determine whether or not the application is error prone.

* Verification Question: 214.: Notice of Adverse Action

We Have Checked Your Application' letter was dated 11/15/21 and stated the family was no longer eligible for free/reduced price meals starting 11/15/21. Provided TA on the number of days written notice that must be given when benefits are reduced/terminated – must give 10 calendar days written notice. Take the date of the letter, count 10 calendar days from that date, then that's the date the benefit is changed (one household's benefits were changed from reduced price to paid). SFA is currently operating SSO for SY 21-22 so all students eat at no charge.

* General Program Compliance Question: 1100.: Smart Snack Guidelines

Explained smart snack requirements: foods and beverages sold to students on the school campus during the school day (a school day is defined as from midnight on a day of instruction to 30 minutes after the end of the official school day); this includes a la carte foods and beverages sold during meal servings. Provided the following link: USDA website: <https://www.fns.usda.gov/cn/tools-schools-focusing-smart-snacks>.

* Sponsor: Free Meals

The SFA should post on social media about the free meals available to students under the SSO waiver instead of having them click the link to the newsletter, and then click another link to get to the lunch sign up form that says meals are free

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208. Confirmation Review – documentation on file, required procedures followed?

Finding 9037: Confirmation review not conducted as required.

Documentation demonstrating that a confirmation review took place was not on file at the SFA. The application selected for verification did not have a signature of the confirming official.

Corrective Action:

1. Create a standard operating procedure of the SFA's verification procedure that is in alignment with the USDA regulations (which can be found in the USDA Eligibility Manual: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf).
2. Train all appropriate staff who complete verification and confirmation reviews.
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 action will be implemented.

Technical Assistance:

The reviewer explained that HCNP requires all applications be confirmed by the confirmation official. Also, the application selected for verification must be confirmed to ensure the application was correctly approved.

211. Verification notification letter?

Finding 9000: Other Finding

The Sponsor utilizes the HCNP's notification letter templates. However, the Sponsor is not completing all fields on the notification letters mailed to households.

Corrective Action:

1. Create a standard operating procedure (SOP) on household notification requirements.
2. Train all appropriate staff who prepare and send household notification letters.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

A reminder was provided to complete the name and date at the top of the "We Must Check Your Application letter." A reminder was provided for the "We Have Checked Your Application" letter to enter the child's name and mark why they were no longer eligible, if applicable (mark the line that you entered that they did not provide the requested income verification documents).

212. Household failed to respond to verification request - SFA follow-up?

Finding 9035: SFA did not follow up as required when households failed to respond to a Verification request.

No documentation was provided or uploaded in Dropbox to validate that the Sponsor met the follow-up requirements for non-responsive households.

Corrective Action:

1. Review the Eligibility Manual for School Meals, Section 6: Verification.

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2. Train all appropriate staff who verify applications on the verification process, which includes the follow-up requirement for non-responsive households.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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213. SFA notice of adverse action - required information, appeal rights?**Finding 9000: Other Finding**

The SFA is not disclosing the correct number of days for a household to appeal a decision on the adverse action notice.

Corrective Action:

1. Review the Eligibility Manual for School Meals.
2. Train all appropriate staff who prepare and send adverse action notices.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

The SFA gave 30 days to appeal. SFA should have given only 10 calendar days to appeal.

215. SFA complete verification by Nov 15 or request extension?**Finding 9000: Other Finding**

There were errors in the data reported in the FNS-742 report (results and number of error-prone applications). The form was revised and resubmitted with the correct data. No further action is required.

Corrective Action:

Corrected - no further action is required.

General Program Compliance - Kaohao PCS (1436-2)**808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?****Finding 9000: Other Finding**

SFA has access to translated materials to provide families when needed, but the staff is unsure about translators.

Corrective Action:

1. Create a standard operating procedure (SOP) so staff will know what to do if they have LEP families.
2. Train all appropriate staff on the SOP.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

The SFA was informed that their school can utilize any DOE resources available and to develop a procedure so staff will know what to do if they have LEP families.

808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?**Finding 9008: Civil Rights information on the Off-site Assessment Tool not validated, or deficiencies found.**

The lunch order forms do not include information on how families can request meal accommodations for a disability.

Corrective Action:

1. Update the lunch order forms to include information on how families can request meal accommodations for a disability.
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:

Technical assistance provided to address discrepancies or deficiencies in the SFA's Civil Rights procedures identified from the Off-site Assessment Tool: The reviewer provided the SFA with a link to HCNP's meal accommodation form template: https://hcnf.hawaii.gov/wp-content/uploads/2019/06/copy_of_medstatement_june2019-FILLABLE.PDF.

810. Non-discrimination on appropriate Program materials?**Finding 9000: Other Finding**

The non-discrimination statement was not used on all program materials. The SSO email sent to households did not include the non-discrimination statement.

The incorrect nondiscrimination statement was on the school's website.

The nondiscrimination statement was missing on the school's Sign-up for School Lunch form.

Corrective Action:

SFA corrected this on 4/27/2022 - no further action required.

Technical Assistance:

An explanation of when to use the short nondiscrimination statement versus the long version of the nondiscrimination statement was provided. The short version, "This institution is an equal opportunity provider," can be used when the document is one page and there is not enough space for the long version. The long version is used when the document is more than one page (such as the Lunch Order Form). Also, the long version must be used on certain documents, such as the free and reduced-price meal applications and all eligibility and verification notification letters to households.

1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?**Finding 9000: Other Finding**

The web address provided for the Local School Wellness Policy is broken or no longer available to the public.

Corrective Action:

1. Post the most recent Local School Wellness Policy to the SFA's website.
2. Keep documentation on file to show that the public requirement was met.

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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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*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 did not provide documentation on how they inform all potential stakeholders (parents, students, staff, community) that they can participate in the development, review, update, and implementation of the school wellness policy.

Corrective Action:

1. Create a process of how potential stakeholders will be made aware to participate in the development, review, update, and implementation of the Local School Wellness Policy.
2. Make potential stakeholders aware of the ability to be able to participate in the development review, update, and implementation of the Local School Wellness Policy.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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 action will be implemented.

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: Link to Summary of Final Rule: https://fns-prod.azureedge.us/sites/default/files/resource-files/LWPsummary_finalrule.pdf.

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

The new school nutrition program director does not meet the minimum hiring requirements. The SFA recently submitted a letter explaining the difficulty in finding a qualified candidate.

Corrective Action:

1. The SFA must ensure that any new director hired on or after July 1, 2015 meets the USDA Professional Standards requirements.
2. Keep all documentation on file to support the hiring requirements for new directors. Documentation must be kept for 3 years plus the current school year, or 6 years plus the current year, if required to follow the Hawaii State Department of Education requirement.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

The School Nutrition Director has not completed the 8-hour food safety training within 5 years prior to their starting date, or

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within 30 calendar days of their starting date.

Corrective Action:

1. The School Nutrition Program Director must complete required 8 hours of food safety training. The food safety training must be completed either not more than 5 years prior to their starting date or completed within 30 days of the employee's starting date.
2. Keep training documentation (certificate) to confirm that training was completed. Documentation must be kept for 3 years plus the current school year, or 6 years plus the current year, if required to follow the Hawaii State Department of Education requirement.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

The Food Service Director has completed 2 hours of food safety training and has a current Food Safety Food Handlers card. Therefore, an additional 6 hours of food safety training must be completed. An email from HCNP was distributed the day of the exit conference, which included two SOPs, one was for "Professional Standards – Hiring a New School Nutrition Program Director". The SFA was asked to review the SOP. Preferred examples of food safety training in addition to the Hawaii State Department of Health Food Handler's courses are ServSafe certification or another ANSI-accredited food safety training programs. The State Agency requires all Food Service Directors, regardless of their starting date, to complete continuing education training of eight hours of food safety training every five years. The SFA was asked to submit documentation that the additional food safety training was completed to meet the 8-hour food safety training requirements.

1602. On-site observation validate Off-Site Assessment Tool responses to SFSP & SBP Outreach questions?**Finding 9009: SFSP & SBP Outreach information on the Off-site Assessment Tool not validated, or deficiencies found.**

Documentation was not provided to validate that SFSP outreach was completed.

Corrective Action:

1. Create a standard operating procedure (SOP) on how the SFA will ensure households are notified about the availability and location of free summer meals 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 appropriate staff.
4. Maintain documentation demonstrating annual SFSP outreach was completed.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Program Year 2022

Ka'ohao PCS (320-PCS)

140 Alala Road
Kailua, HI 96734-3125

Month of Review: March 2022

Date of Onsite Review: April 25, 2022

Meal Observation: April 13, 2022

Technical Assistance

* Meal Components & Quantities Question: 402.: Portion Sizes

Baby carrots: The serving size listed on the production record was 3/4 cup but a #6 disher was used to portion the baby carrots. A #6 disher is 2/3 cup, not 3/4 cup. Therefore, a #6 disher would provide 5/8-cup, not 3/4-cup of vegetables. Since the meal observation showed that the #6 disher was filled more than a level scoop, it appeared more than 5/8 cup was served per portion. Therefore, it appears that each portion most likely had 3/4 cup of carrots as opposed to 5/8 cup. Immediately correct this issue and use the appropriate serving utensil to ensure that 3/4 cup is served, such as a 6 oz spoodle/portion server or a 3/4 cup measuring cup.

Here is a link to the Institute of Child Nutrition's Basics At a Glance Poster: <https://theicn.org/icn-resources-a-z/basics-at-a-glance-2/> (see page 2 which has a chart for the dishers and ladles/portion servers.

* Meal Components & Quantities Question: 410.: Insufficient Vegetable Offered

On 3/8/22, students were allowed to choose one vegetable: 3/4 cup of broccoli or 1/2 cup of mashed potatoes. Offering a variety of choices within the food component is different from OVS. If choices within components are offered, the menu planner must indicate what choices or combination of choices the student may select in order to have a reimbursable meal.

Since students were only allowed to select a 1/2 cup of mashed potatoes or 3/4 cup of broccoli, the minimum daily vegetable requirement of 3/4 cup was not met because those who selected 1/2 cup of mashed potatoes were only allowed up to have up to maximum of 1/2 of vegetables and not 3/4 cup.

Below is an example from the USDA Offer Versus Serve Guidance for NSLP and SBP (effective beginning SY 2015-2016, page10) available at <https://fns-prod.azureedge.us/sites/default/files/cn/SP41-2015av2.pdf>.

“Example:

Menu for Grades K-5 and 6-8:

Choose 1: Hamburger on Bun or Roasted Turkey Sandwich (1.5 oz eq meat/meat alternate, 2 oz eq grains)

Choose 1: baked beans, sweet potato wedges, green beans (3/4 cup each)

Choose up to 2: Assorted fruit, fruit cocktail (1/4 cup each (1/2 cup total with two selections)

Choose 1: nonfat flavored milk or low fat unflavored milk (1 cup milk)”

-- For the vegetables, three different vegetables are offered and each are 3/4 cup portions and the students can select one vegetable. This meets the minimum daily vegetable requirement of 3/4 cup of vegetable.

- Below is another example in the USDA Offer Versus Serve Guidance on page 7:

“For example, for grades 9-12 at least one cup of fruit must be offered in a reimbursable lunch. Additionally, the menu planner may choose to offer a variety of fruit. If 1/2 cup portions of three different fruits are offered, the menu planner would indicate that the student may select up to two 1/2 cup servings from any of the three fruit choices offered. This provides a variety of food choices to the student and shows the student how to select a reimbursable lunch.”



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-- Therefore, when applying this example to your SFA, $\frac{3}{4}$ cup of vegetables is the minimum daily requirement. If you offer different vegetables in $\frac{1}{2}$ cup portions, the SFA must indicate what choices or combination of choices the student may select, such as 'Choose up to two vegetables: broccoli, mashed potatoes (1/2 cup each).

Meal Counting & Claiming - Ka'ohao PCS (320-PCS)

318. DOR - accurate meal counts by category at POS? Enter data.

Finding 9066: Inaccurate meal counts by eligibility category at the POS.

As observed on the Day of Review, each type of meal service line does not provide an accurate count by eligibility category at the point of service. The SFA is operating SSO for the school year 21/22, all meals are claimed free.

During meal observation, it appears the meal clerk is counting meals before the students finish selecting all of their lunch items. The meal clerk is responsible for ensuring all meals counted for reimbursement are reimbursable. If meals are non-reimbursable, then meals must be counted as a non-reimbursable meal.

Corrective Action:

1. Create a standard operating procedure (SOP) on the SFA's meal counting procedures, detailing how meals will be correctly counted at the POS.
2. Train all appropriate staff on the SOP.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Technical Assistance:

The students should stop in front of the meal clerk and state their name while she checks that the student has a reimbursable meal and finds their name to record the meal in the POS. Having the students state their names will also help when there are substitute meal clerks or new meal clerks not familiar with the students.

323. Days when F/R/P lunch counts exceed number of attendance adjusted eligibles? Enter data.

Finding 9000: Other Finding

The March 2022 claim was filed with 317 free and total eligible students. However, according to the March 2022 daily Edit Check Worksheet, the highest enrollment for March 2022 was 316. The SFA was advised to revise the March 2022 claim.

Corrective Action:

Corrected - no further action is required.

Meal Components & Quantities - Ka'ohao PCS (320-PCS)

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

Finding 9000: Other Finding

The utensil used to portion the carrots was not the correct serving size. The #6 disher measures $\frac{2}{3}$ cup, not $\frac{3}{4}$ cup. However, the vendor was overfilling the #6 disher, and it appears the correct serving size was served. A 6-oz spoodle or a $\frac{3}{4}$ cup measuring cup should have been used to serve the $\frac{3}{4}$ cup of baby carrots.

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1. Review the USDA NSLP meal pattern requirements.
2. Train the vendor on the meal pattern requirements, including using proper utensil sizes.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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404. DOR - signage explaining reimbursable meal near/at beginning of service line?**Finding 9000: Other Finding**

On the school's website, they listed, "Cold water is provided for students who do not prefer milk." Water is not allowed to be promoted as an alternative selection to fluid milk. Informed SFA to remove this statement from the school's website.

Corrective Action:

The SFA removed the statement from the school's website on 4/27/2022. No further action is required.

**409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?
Enter data.****Finding 9081: Review of Productions records expanded to the entire Review Period.**

Based on a review of production records and other supporting food crediting documentation for the entire Review Period, some meals served during the Review Period did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Review Period meals missing required meal components:

Friday (3/11/22): For the vegetarian option, the vendor was not able to get the tofu that they regularly use and instead used a different brand of tofu. The tofu that was used as a substitute for the brand that the school regularly uses is not creditable under the USDA requirements as a meat alternate because it does not contain enough protein (it contains 4.4 grams of protein in 2.2 oz). Per SP53-2016 Crediting Tofu and Soy Yogurt Products in the School Meal Programs and the Child and Adult Care Food Program: https://fns-prod.azureedge.us/sites/default/files/cn/SP53_CACFP21_2016os.pdf.

- "In the school meal programs and CACFP, 2.2 ounces (1/4 cup) of commercially prepared tofu, containing at least 5 grams of protein, is creditable as 1.0 ounce equivalent meat alternate."

The vendor states this substitution was done only on this day and submitted the label for the tofu that they normally use - this item meets the USDA requirements. The 12 vegetarian meals served on this day are not reimbursable and will be disallowed.

Corrective Action:

1. Submit written assurance that all meals counted as reimbursable will contain all necessary components.
2. Create and submit a standard operating procedure (SOP) on reviewing vendor substitutions to ensure that they meet meal pattern requirements, and how to document non-reimbursable meals that do not comply with the USDA NSLP meal pattern requirements.
3. Provide training to all relevant staff on the contents and implementation of the new SOP.
4. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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.

When serving Tofu, the SFA should refer to SP02-2024 Revised: crediting Tofu and Soy Yogurt Products in the School Meals Programs that replaces SP53-2016 at https://fns-prod.azureedge.us/sites/default/files/resource-files/SP02_CACFP02_SFSP02_2024os.pdf to ensure meal pattern requirements are met.

410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.**Finding 9000: Other Finding**

The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 9 oz. eq. was not met for grades K-6. The menu offered a minimum of 8.25 oz. eq. of meat/meat alternate throughout the week (3/7/22-3/11/22).

On Tuesday (3/8/22) and Thursday (3/10/22), 1/2 cup lentils were offered as the vegetarian option. Per the recipe provided, 3 lbs 12 oz lentils were used for 50 1/2-cup portions. Per the Food Buying Guide, each lb of lentils provides 6.125 cups cooked lentils x 3.75 lbs used = 22.96 cups cooked lentils/50 servings = 0.459 cups per serving. A full 1/2 cup of lentils alone would be needed to provide 2 oz. eq. meat/meat alternates per serving, and thus the recipe only credited as 1.75 oz. eq. meat/meat alternates. The 1/2 cup serving size of lentils included other vegetables in the recipe, so the total amount of actual lentils was less than 1/2 cup. Increase the portion size to 2/3 cup to provide at least 2 oz. eq. meat/meat alternates per serving.

On Friday (3/11/22), a non-creditable tofu was used and did not count toward the weekly meat/meat alternate served.

Corrective Action:

1. Update menus and recipes to come into compliance with the 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 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Productions records were reviewed for the Review Period (3/7/22-3/11/22) to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. During lunch on 3/8/2022, students had a choice of either a 3/4 cup of broccoli or a 1/2 cup of mashed potatoes. Therefore, the students who selected mashed potatoes did not receive the minimum daily requirement of 3/4 cup of vegetables.

Corrective Action:

1. Update menus and recipes to come into compliance with 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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Technical Assistance:

Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. See below for a description of problem areas noted in completing production records.

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- The recipes listed on production records did not always match the recipe that was actually served.
- Scrambled egg recipe served on Monday: If the optional cheese was offered on the eggs, please record that on the production records.
- Serving sizes documented were not always clear and complete.
 - o Quesadillas and Taco salad served on Wednesday should be recorded as a number of servings and/or pieces.
 - o Ground Turkey and Spaghetti- record spaghetti and meat together or separate from each other, depending on how this recipe is prepared.

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

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

- Turkey Meatballs- The revised recipe is missing serving size information.

A sponsor must maintain current product documentation and nutrition facts labels from the manufacturer for commercially prepared foods. Secure manufacturer labels for all menu items served. Manufacturer labels may be located on the product packaging or on the manufacturer's website. A Nutrition Facts label was not submitted for the following menu item:

- Brown Rice

General Program Compliance - Ka'ohao PCS (320-PCS)

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

Finding 9000: Other Finding

The SFA did not complete onsite monitoring for the 21/22 school year. All SFAs operating Seamless Summer Option (SSO) during the 21/22 school year must conduct onsite monitoring for all points of service locations, including classrooms. This includes single-site SFAs.

Corrective Action:

1. Complete an on-site review for all points of service prior to February 1, including classrooms.
2. Keep the completed MC-7 forms on file to demonstrate that the annual on-site review requirement was met.
3. Create a standard operating procedure (SOP) on how the SFA will ensure all point-of-service locations, including the classroom, are monitored.
4. Train all appropriate staff on the SOP.
5. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
6. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Technical Assistance:

All SFAs are required to review each SSO site at least once during its operation prior to February 1, 2022. If meals are served in the classroom, the SFA must complete the Meals in the Classroom Monitoring Checklist. Refer to the "Monitoring review chart for meals served in the classroom" to determine the number of classrooms to be reviewed. All SFAs must use the following forms: MC-7 Form: <https://hcnp.hawaii.gov/wp-content/uploads/2019/07/Form-MC-7-SFA-On-Site-Review-Checklist.pdf>; Monitoring Review Chart for Meals Served in the Classroom: <https://hcnp.hawaii.gov/wp-content/uploads/2021/07/Classroom-Review-Chart-1.xlsx>; Meals in the Classroom Monitoring Checklist: https://hcnp.hawaii.gov/wp-content/uploads/2021/07/Meals-in-the-Classroom-Monitoring-Checklist_6.18.21-PDF-1.pdf.

1407. SFA written food safety plan implemented?

Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.

Proper HACCP principles were not observed: Insufficient personal hygiene – missing hairnets and insufficient hand washing.

- Observed school staff wash their hands, turn off the faucet with their bare hands, then used bare hands on the paper towel

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dispenser lever to release the paper towel. To help prevent contaminating hands after washing your hands, before washing hands, make sure the paper towel is ready to grab, wash hands, grab the paper towel to dry hands, use the paper towel to close the faucet and to open any doors, such as when going into the kitchen area.

- Observed staff not washing their hands for at least 20 seconds.
- Not all staff were wearing hair restraints in the school's kitchen during lunch preparation – portioning food. One person was observed wearing a hair restraint.

Corrective Action:

1. Review and train on the Standard Operating Procedures (SOPs) for handwashing, glove use, and personal hygiene from the SFA's food safety plan.
2. Train all individuals who work in the cafeteria.
3. Keep training documentation (sign-in sheet, date of training, agenda) on file 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 action will be implemented.

Technical Assistance:

All SFA staff who assist with meal preparation and service must be retrained on the Washing Hands SOP.

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

The SFA did not provide justification documentation to indicate that the Buy Hawaii Provision requirements are being met. The SFA must complete a market study of the top 5-10 items purchased in a month and include justification for not meeting the Buy Hawaii Provision requirements, for example, spaghetti from Italy.

Corrective Action:

1. Complete a market study of the top 5-10 items purchased in a month. Include justification for not meeting the Buy Hawaii Provision requirements, for example, spaghetti from Italy.
2. Maintain justification documentation on file when not meeting the Buy Hawaii Provision Requirements.
3. Monitor deliveries and vendors to ensure compliance with the Buy Hawaii provision.
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 action will be implemented.

Technical Assistance:

Complete a market study of the top 5-10 items purchased in a month. Include justification for not meeting the Buy Hawaii Provision requirements, for example, spaghetti from Italy.

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.