



## SNP Administrative Review Findings

Ke Ana La'ahana PCS (2411-2)

Program Year 2023

### Ke Ana La'ahana PCS (2411-2)

PO Box 4997

Hilo, HI 96720-0997

No. of Sites / Reviewed: 1 / 1

Month of Review: November 2022

Dates of Review: December 5-12, 2022 (excluding December 7, 2022)

Exit Conference Date: December 12, 2022

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

### Commendations

#### \* Summary: Ke Ana La'ahana PCS Commendations

It was a pleasure to work with Ke Ana Laahana's staff and Keaukaha Elementary School Food Services Manager. They were friendly and very responsive in providing the requested documents and in answering questions about their meal service operation. Documents were submitted in an organized manner and corrections to the food production records and serving site daily records were made as soon as the errors were identified. Food time and temperature logs were consistently documented.

During the virtual meal observation, the meal clerk had good control of the Point of Service (POS) line. Ke Ana Laahana's students were polite and stopped at the point of service allowing time for the meal clerk to check their meals.

We appreciate your SFA's flexibility during HCNP's virtual Administrative Review, overcoming technical challenges during the virtual meal observation, and for submitting the numerous documents via drop box links.

#### \* Resource Management: Thank you!

Thank you very much for uploading the requested fiscal documents and answering our questions promptly.

### Technical Assistance

#### \* General Program Compliance: Food Safety Training

Provided the Hawaii State Department of Health Sanitation Branch resources for the 8-hour Food Safety Training courses.

### Suggestions

#### \* General Program Compliance: Food Safety Training

The School Nutrition Director has completed the Hawaii State Department of Health's Food Handler's Safety Course. HCNP highly recommends your SFA's School Nutrition Director to take a comprehensive 8 hour Food Safety Training course. The list of available 8-hour food safety training courses were previously shared with the School Nutrition Director.

#### \* General Program Compliance Question: 1217.: Tracking Tool

SFA's SY 22-23 Training Tracker Tool is the older version of the template which does not have the Training Title and Learning Objectives columns. Use the 5/2021 HCNP Training Tracker template. The template is found at the HCNP website under NSLP->Professional Standards.

## SNP Administrative Review Findings

Ke Ana La'ahana PCS (2411-2)

## Program Year 2023

## \* General Program Compliance: Complaint Log

SY 21-22 Complaint log has a line drawn through the page. If the line indicated no complaints were received, the words "No complaints received" should be written on the log. 12/12/22 – HCNP received a revised SY 21-22 complaint log from the SFA.

## General Program Compliance - Ke Ana La'ahana PCS (2411-2)

## 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. \*Repeat Finding**

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

- Policy on food and beverage marketing, ensuring compliance with Smart Snacks in School standards
- Clear description of public involvement, including opportunities for participation, public updates, and details on leadership roles, meeting frequency, and evaluation procedures
- A process for conducting the Triennial Assessment, including benchmarks to assess progress toward nutrition goals (e.g., increasing fruit and vegetable consumption by 25%)
- Inclusion of the USDA Non-Discrimination Statement

**Corrective Action:**

1. Identify wellness policy leadership within the SFA—designate one or more individuals with the authority and responsibility to ensure school-wide compliance.
2. Revise the wellness policy to include all required elements, such as:
  - Procedures for reviewing and updating the policy
  - Public participation strategies
  - Food/beverage marketing standards
  - Triennial assessment process and metrics
3. Document the updates to the Local School Wellness Policy and maintain this documentation on file.
4. Post the updated LWP on the SFA's official website for public access and transparency.
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:**

Technical assistance provided to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool:

- Local Wellness Policy (LWP) – Discussed the provisions of the LWP and the components that need to be included in the SFA's revised LWP. USDA's LWP requirements and resources were provided along with Minnesota School District's sample Triennial Assessment.

## 1501. Records retained for 3 years?

**Finding 9152: SFA not retaining Program records for a minimum of 3 years.**

The SFA is not in compliance with USDA record retention requirements. School Year 2019–2020 NSLP/SBP records are stored off-site and are currently inaccessible due to fire damage in the building. While the SFA's records were not affected by the fire, they are still unavailable, and as such, the SFA is unable to provide access to the required records during the review.



## SNP Administrative Review Findings Program Year 2023

## Ke Ana La'ahana PCS (2411-2)

Per 7 CFR 210.9(b)(17), all program records must be retained for 3 years after the date of the final claim for reimbursement for the fiscal year, or longer if audit findings have not been resolved.

### **Corrective Action:**

On December 19, 2022, the State Agency received a photo verification confirming that School Year 2019–2020 NSLP/SBP records are stored off-site. As the documentation has been verified and is accounted for, no further action is required at this time.

## IX Special Provision Options - Ke Ana La'ahana PCS (2411-2)

2115. *CEP most recent approval – documentation support ISP and claiming percentages?*

### **Finding 9000: Other Finding**

SFA's Community Eligibility Provision (CEP) documentation indicated 28 identified students (28 SNAP) out of 41 enrolled students which resulted in 68.29% ISP. The State Agency reviewed the documentation submitted by the SFA, and there were 27 identified students (25 SNAP and 2 Foster) out of 41 enrolled students. This resulted in 65.85% ISP.

### **Corrective Action:**

Free claiming percentage remains at 100%. No further corrective action is required.



## SNP Administrative Review Findings

Ke Ana La'ahana PCS (2411-2)

Program Year 2023

### Ke Ana La'ahana (549-PCS)

162A Baker Ave  
Hilo, HI 96720-0997

Month of Review: November 2022

Date of Onsite Review: December 5, 2022

#### Commendations

- \* Meal Components & Quantities: Thank you!

Thank you very much for uploading the requested fiscal documents and answering our questions promptly.

#### Technical Assistance

- \* Meal Components & Quantities: Bundling lunch items for a reimbursable meal

During the virtual meal observation day (12/6/22), Keaukaha's School Food Services Manager mentioned the bundled lunch items would be the Pepperoni Pizza, 1/2c Fruit Cocktail, and 1/2c fruit juice. Reviewer mentioned bundled items for a reimbursable meal include 2 full components plus 1/2c fruit or vegetables. Since the Pepperoni Pizza contain 2 full components (2 oz eq grain and 2 oz eq meat/meat alternate), only 1/2c of fruit or 1/2c juice is needed.

#### Meal Components & Quantities - Ke Ana La'ahana (549-PCS)

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

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

Production records were reviewed to determine whether the portion sizes of meal components served during the review period met the minimum meal pattern requirements for the appropriate age/grade group.

On 11/16/22, the lunch meal for grades 9–12 did not meet the required 1 cup minimum of vegetables. The Food Production Record (FPR) documented:

- ½ cup Emoticons potatoes
- ½ cup leaf lettuce (credits as ¼ cup dark green)
- 1/8 cup tomato

This totals 7/8 cup of creditable vegetables—1/8 cup short of the required minimum.

The SFA indicated that 1 cup of leaf lettuce was actually served, indicating a discrepancy between the food served and what was recorded on both the FPR and the Serving Site Daily Record (SSDR).

Accurate food production records are essential to demonstrate compliance with USDA meal pattern requirements. Accurate food production records are essential to demonstrate compliance with USDA meal pattern requirements.

##### **Corrective Action:**

HCNP received the revised FPR and SSDR indicating that 1 cup of leaf lettuce was served. No further action is needed.



## SNP Administrative Review Findings Program Year 2023

Ke Ana La'ahana PCS (2411-2)

### General Program Compliance - Ke Ana La'ahana (549-PCS)

1408. *Temperature logs available?*

**Finding 9149: Temperature logs unavailable for review.**

November 18, 2022: Hot holding (H) and Cold holding (C) time/temperature log. The current copy is not clear. Please resend.

**Corrective Action:**

The temperature logs were received on December 12, 2022. No further corrective action is required.

**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.**