



Hawaii Department of Education

SNP Administrative Review Findings

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

Program Year 2022

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

16-120 Opukaha'ia St.,
Kea'au, HI 96749-8135

No. of Sites / Reviewed: 3 / 1

Month of Review: March 2022

Date of Review: April 8-14, 2022

Exit Conference: April 14, 2022

Due Date for Corrective Action: August 20, 2025

Commendations

* Summary: Ke Kula 'O Nāwahīokalani'ōpu'u Commendations

Ke Kula 'O Nāwahīokalani'ōpu'u Laboratory staff were friendly and accommodating in providing additional information and in answering questions about their meal service operation. SFA submitted documents in an organized manner by the due dates. Reviewer's suggestions were promptly implemented. For example, moving the shared milk bin to a location after the Point of Service (POS), reminders to students to take a milk at the beginning of the serving line, and purchasing the red and green cleaning and sanitizing buckets.

Meal clerk had good control of the Point of Service (POS) line. K-8 students are well trained to stop at the POS and identify themselves before leaving the POS.

Thank you for your flexibility during HCNP's virtual Administrative Review, recording meal service operations, and submitting the numerous documents via drop box links. We appreciate your feedback and learning from you during this process as we work to make improvements for future ARs.

Technical Assistance

* Summary: TA provided to Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab

- Directed SFA staff to the HCNP weblink for HCNP Master List template: https://hcnp.hawaii.gov/wp-content/uploads/2020/07/Master-List-Template_7.2020.xlsx

- o There are tabs for each category and column to show the start and end dates for the eligibility status that is not reflected on the SFA's current Master List.

- o Refer to the NSLP Free and Reduced Priced Application training, Part 2 for information on the Master List.

- Nondiscrimination Statement: During the Administrative Review in SY 21-22, mentioned to staff the two versions of the Nondiscrimination Statement (9/2020) found on the HCNP website. A print format (for printed documents) and web based format (if it is used on websites where the person can click on the links):

- Print format: <https://hcnp.hawaii.gov/wp-content/uploads/2020/12/Civil-Rights-Nondiscrimination-Statement-PRINT-FORMAT-9.2020-1-3.docx>

- Web-based format: <https://hcnp.hawaii.gov/wp-content/uploads/2020/12/Civil-Rights-Nondiscrimination-Statement-WEB-BASED-FORMAT-9.2020-1-1.docx>

- Complaint Form: Refer to the revised Complaint form (3/2022) found at the HCNP website: <https://hcnp.hawaii.gov/wp-content/uploads/2022/03/HCNP-Discrimination-Complaint-Form-3.2022.pdf>

- Food Safety:

- o Cleaning bucket and a sanitizing bucket: should be used during meal service operations. Label the buckets according to the contents for cleaning and sanitizing. Staff mentioned food service cleaning and sanitizing buckets have been ordered.

- o Taking temperature: Discussed with SFA staff the method to take milk temperature without opening the milk carton by placing the thermometer probe between 2 unopened milk cartons and holding the cartons together. Shelf stable boxed juices do not need a temperature reading as these are shelf stable sealed cartons.

SNP Administrative Review Findings**Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)****Program Year 2022**

- * Certification and Benefit Issuance Question: 123.: Eligibility Master List

Directed SFA staff to the HCNP weblink for the HCNP Master List template: https://hcnp.hawaii.gov/wp-content/uploads/2020/07/Master-List-Template_7.2020.xlsx.

- The HCNP master list template has two tabs for each category and columns that show the start and end dates for the eligibility status that is not reflected on the SFA's current Master List.
- For more information on the Eligibility Master List, refer to the NSLP Free and Reduced Price Application training, Part 2.

Suggestions

- * Summary: Suggestions.

Resolve issues with the SFA's food vendor: Ke Kula 'O Nāwahīokalani'ōpu'u Iki Laboratory's administration is advised to speak with Keaau High School Administration and SFSB Supervisor to discuss and mitigate systemic issues relating to late meal delivery, lack of communication for late meal delivery times, missing time and temperature documentation on the meal delivery sheet (Serving Site Delivery Record), incomplete Food Safety Plan, food (steamed carrots and corn) arriving cold, food packed in oversized containers which pose a safety risk to Nawahi staff, etc.

General Program Compliance - Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)**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 SFA did not publish a media release near or at the beginning of the school year notifying the public that free and reduced-price meals are available as required by 7 CFR 245.5(a).

Corrective Action:

1. Create the required public release, ensuring it includes the USDA nondiscrimination statement. Each year, HCNP provides a public release template that is available on HCNP's website for SFAs to use and complete.
2. Distribute the release through appropriate channels (e.g., news media, unemployment office, any major employers contemplating large layoffs in the attendance area of the school).
3. Maintain documentation verifying distribution and publication, including copies of the release and where it was posted or sent.
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:

Technical assistance was provided to address discrepancies or deficiencies in the SFA's Civil Rights procedures identified from the Off-site Assessment Tool: The SFA explained that program outreach notices were only distributed to families. As required by 7 CFR 245.5(a), near or at the beginning of each school year the public must be notified of free and reduced-price meals. This notice must include the eligibility criteria for free and reduced-price meals. The public notices must be provided to the local news media, the unemployment office, and any major employers contemplating large layoffs in the attendance area of the school. [7 CFR 245.5(a)(2)]

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

The one-call text/emails to families regarding breakfast outreach, free Seamless Summer Option (SSO) meals, and Grab and Go meals did not contain the nondiscrimination statement.

The Local Wellness policy had an outdated version of the nondiscrimination statement.



SNP Administrative Review Findings

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

Program Year 2022

Corrective Action:

1. Review and revise all documents to ensure they contain the current, complete USDA nondiscrimination statement. The most current nondiscrimination statement is available at: <https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>. Replace any materials that include outdated or incomplete versions.
2. Maintain documentation on file confirming that all relevant materials have been updated with the correct nondiscrimination statement, including the date of revision and a list of revised documents, including a copy of the one-call message regarding meal services the next time the message is sent to families.
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:

During the Administrative Review in SY 21-22, HCNP mentioned to the staff that two versions of the Nondiscrimination Statement (09/2020) can be found on the HCNP website. A print format (for printed documents) and a web-based format (if used on websites where the person(s) can click on links and access the form).

-Print format: <https://hcnp.hawaii.gov/wp-content/uploads/2020/12/Civil-Rights-Nondiscrimination-Statement-PRINT-FORMAT-9.2020-1-3.docx>.

-Web-based format: <https://hcnp.hawaii.gov/wp-content/uploads/2020/12/Civil-Rights-Nondiscrimination-Statement-WEB-BASED-FORMAT-9.2020-1-1.docx>.

Please refer to HCNP's website for the most current nondiscrimination statement to include on all program materials:
<https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>.



SNP Administrative Review Findings

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

Program Year 2022

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Laboratory (563-PCS)

16-120 Opukaha'ia St.,
Kea'au, HI 96749-8135

Month of Review: March 2022
Meal Observation: April 1, 2022

Technical Assistance

* Other Federal Programs Question: 1902.: FFVP Operational Costs

Technical Assistance provided on FFVP operation and administrative labor costs, and how adjustments can be made in upcoming claims, if any are required. Explanations were provided to account for the larger labor costs in November 2021 and for the hours/costs being charged for FFVP operation costs.

Meal Counting & Claiming - Ke Kula 'O Nāwahīokalani'ōpu'u Iki Laboratory (563-PCS)

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

Finding 9000: Other Finding

Lunch meals were not properly counted at the Point of Service. Meal clerks scanned student ID cards for two students whose meals were picked up by adults without the students at the Point of Service. The two lunches will be disallowed.

Corrective Action:

1. To correct this finding, complete meal counting and claiming training.
2. Submit training documentation (date of training, training handouts, training certificate/training log) to confirm meal counting and claiming training was completed by appropriate staff.
3. Create and submit a standard operating procedure (SOP) on the SFA's meal counting and claiming procedures detailing how meals will be counted correctly at the point of service for students who are not able to pick up their meals in the cafeteria. Include in the SOP the name(s) and title(s) of the person(s) responsible at the SFA for ensuring compliance.
4. Train all appropriate staff on the SOP to ensure that meals are counted correctly at the point of service.
5. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training on the SOP 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 action will be implemented.

Technical Assistance:

Meals must be counted at the point of service where the student, the meal, and the meal counter are all present to determine that a reimbursable lunch has been served to an eligible child. The SFA must use student rosters or a form for the adult to count the student meals at a location other than the usual meal serving site. The student roster or form is completed after the reimbursable meal is served to the student. The completed form is then given to the meal clerk to enter into the POS system.

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

Finding 9000: Other Finding

The number of eligible students on the edit check worksheet and attendance rosters provided does not match the number of eligible students on the monthly claim. For example, the attendance rosters and edit checks for March 2022 indicate there are 343 eligible students. The claim for March 2022 indicates there are 360 eligible students. The SFA must ensure that they are

SNP Administrative Review Findings**Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)****Program Year 2022**

reporting the correct number of eligible program participants as enrollment numbers change. The SFA should note discrepancies in any information and maintain supporting documentation to support the claim.

Corrective Action:

1. Create a standard operating procedure (SOP) to maintain meal counting and claiming documentation, including updating attendance eligible students as enrollment numbers change and documenting or explaining discrepancies between the documentation used to file the claim and supporting documentation.
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.

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.

324. Questionable patterns in Free, Reduced Price or Paid meal counts? Enter data.**Finding 9000: Other Finding**

The SFA did not provide or document an explanation of questionable meal counting, such as why they claimed 150 breakfast meals daily during the review period.

Corrective Action:

1. Create a Standard Operating Procedure (SOP) to maintain meal counting and claiming documentation, including explaining unusual or questionable daily meal counts, documenting or explaining discrepancies between the documentation used to file the claim and supporting documentation.
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.

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 SFA is advised to provide explanations on the daily edit check worksheets for any discrepancies or unusual events to support the claim for reimbursement. For example, the exact number of meals claimed daily, if the meal counts are higher or lower than normal participation, such as field trips, illness, etc.

325. Review Period meal counts by category correctly used in the claim? Enter data.**Finding 9000: Other Finding**

There is a discrepancy between the information on the meal participation report and the edit check worksheet provided during the administrative review. The SFA did not provide documentation or make a notation of this discrepancy to support the difference. For example, the SFA's edit check worksheet for March 8, 2022, indicates that 285 lunches and 150 breakfast meals were counted and claimed for reimbursement. However, the March 8, 2022, meal participation report indicates 581 lunches and 300 breakfasts were counted. The lunch count on the meal participation report exceeds the daily attendance and the number of eligible students.

Corrective Action:

1. Create a Standard Operating Procedure (SOP) to maintain meal counting and claiming documentation, including explaining unusual or questionable daily meal counts, documenting or explaining discrepancies between the documentation used to file the claim and supporting documentation.
2. Train the appropriate staff on the SOP.



SNP Administrative Review Findings

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

Program Year 2022

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.

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 SFA must ensure they maintain all documentation and supporting documentation used to file their claim for reimbursement. The SFA must document or explain any discrepancies between the claim documentation and supporting documentation. This includes maintaining documentation of any errors in the meal counting system and corrections.

Meal Components & Quantities - Ke Kula 'O Nāwahīokalani'ōpu'u Iki Laboratory (563-PCS)

401. DOR - meals selected by students contain all required components/quantities? Enter data.

Finding 9000: Other Finding

On the day of review (4/1/22), one student did not take a milk at Lunch and a reimbursable meal was claimed. On 4/14/22, the SFA submitted their corrective action supporting documentation that the student's meal claim was reversed in the electronic POS system.

Corrective Action:

Documentation was provided that the meal was reversed. No further action is required.

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

Finding 9000: Other Finding

The production records are incomplete; not all required fields are correctly documented. The SFA is not validating the items delivered on the vended production record. For example, the vendor is not completing the site name and the number of servings for each component delivered to each site. The SFA is not correctly completing the vended meal production record after the meal service. The SFA does not complete the number of meals served and leftover portions, and no information for milk is recorded on the production record for the day of the meal observation.

Corrective Action:

1. Create a Standard Operating Procedure (SOP) on properly completing food production records for the meals produced and served.
2. Train the vendor and SFA 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.

Technical Assistance:

The SFA must ensure that they are keeping accurate and complete production records for the meals they produce. The records must be completed throughout the meal service and maintained every day. At a minimum, the production records should include the item name, the recipe or item number, the portion size, the number of planned portions, the component contribution amount, and the number of actual servings. All kitchen staff should be trained on completing production records so that everyone can complete the records.



SNP Administrative Review Findings

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

Program Year 2022

404. DOR - signage explaining reimbursable meal near/at beginning of service line?

Finding 9000: Other Finding

The meal signage posted is for Offer versus Serve. OVS is not currently implemented; remove the OVS signage for this school year and then repost near or at the beginning of the serving line when OVS is implemented in the next school year.

Corrective Action:

1. Post clear and visible signage of what constitutes a reimbursable meal when Offer versus Serve is not implemented.
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.

General Program Compliance - Ke Kula 'O Nāwahīokalani'ōpu'u Iki Laboratory (563-PCS)

1407. SFA written food safety plan implemented?

Finding 9000: Other Finding

The SFA does not follow its Standard Operating Procedure (SOP) for Cleaning and Sanitizing Food Contact Surfaces in its Food Safety Program manual; the SFA does not have chemical test kits to monitor the appropriate sanitizer concentration levels.

Corrective Action:

The SFA provided pictures of the sanitizer strips during the corrective action phase. No further action is required.

Technical Assistance:

1. Order sanitizer test strips to monitor sanitizer concentration levels.
2. The SFA must use a cleaning bucket and a sanitizing bucket during meal services. Label the buckets according to the contents for cleaning and sanitizing. The staff mentioned that food service cleaning and sanitizing buckets have been ordered.
3. Taking temperatures: HCNP discussed with the SFA staff the proper method for checking milk temperatures without opening the milk cartons. The temperature can be taken by placing the thermometer probe between 2 unopened cartons and holding them together. Shelf-stable boxed juices and milk do not need a temperature reading, as these are shelf-stable sealed cartons.

1408. Temperature logs available?

Finding 9000: Other Finding

The time and temperature on the Serving Site Daily Record (SSDR) form provided by the food vendor were not completed.

Corrective Action:

The SFA provided a completed SSDR form for 5/12/2022. No further action is required.

Technical Assistance:

The SFA must contact the food vendor and discuss completing the time and temperature documents on the SSDR form. Actual time must be noted. Do not draw an arrow down the "time" column.

Other Federal Programs - Ke Kula 'O Nāwahīokalani'ōpu'u Iki Laboratory (563-PCS)

1905. FFVP: Widely publicized within the school?



SNP Administrative Review Findings

Ke Kula 'O Nāwahīokalani'ōpu'u Iki Lab PCS (2414-7)

Program Year 2022

Finding 9000: Other Finding

The SFA did not provide documentation that the FFVP program is widely publicized within the school. The SFA did not provide examples of the FFVP educational materials sent to the teachers for this school year.

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 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.