



## SNP Administrative Review Findings Program Year 2023

**Malama Honua Public Charter School (1442-7)**

### Malama Honua Public Charter School (1442-7)

41-054 Ehukai Street  
Waimanalo, HI 96795

No. of Sites / Reviewed: 1 / 1

Month of Review: December 2022

Date of Review: January 9 – 13, 2023

Exit Conference: January 13, 2023

Due Date for Corrective Action: **July 17, 2025**

### Commendations

- \* Summary: Commendations.

Thank you for being flexible in your scheduling for the week of the AR.

Great job providing live-streaming and recorded video of your school's meal service operations. It was the best videography we have seen thus far!

The staff was helpful and thorough when responding to our questions and requests for information. Your SFA's teamwork is truly commendable.

### Technical Assistance

- \* Certification and Benefit Issuance Question: 132.: Eligibility Documentation

HCNP identified a student on the direct certification master list who was not listed on other documents. The SFA clarified that this student transferred to a private school and was not enrolled at Mālama Honua PCS during SY 2022-2023. The SFA was reminded to mark and indicate any changes in student enrollment on all documents and reports.

- \* Certification and Benefit Issuance Question: 133.: Direct Certification Lists

HCNP identified a student on the direct certification master list who was not listed on other documents. The SFA clarified that this student transferred to a private school and was not enrolled at Mālama Honua PCS during SY 2022-2023. The SFA was reminded to mark and indicate any changes in student enrollment on all documents and reports.

- \* Meal Counting & Claiming Question: 314.: OVS implementation

Under offer versus 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 a 1/2 cup of fruit or vegetable.

- Prior to the AR, the SFA stated that 4 out of the 5 meal components are pre-plated and students have the option to select milk. This is not considered true OVS. Since MHPCS serves grades K-8, your SFA is not required to implement OVS.
- The SFA decided that it will not implement OVS. Revisions were made to the SY 22-23 NSLP renewal application to reflect this change, and adjustments were made to the SFA's meal service operation.

### Suggestions

- \* Summary: Suggestions.

To help expedite meal service, staff can pour cups of milk out in advance instead of pouring the milk out as the student receives their reimbursable meal.

**SNP Administrative Review Findings**  
**Program Year 2023****Malama Honua Public Charter School (1442-7)****Certification and Benefit Issuance - Malama Honua Public Charter School (1442-7)****123. On-site observation validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions?****Finding 9000: Other Finding**

The start and expire dates listed on the Etrition Eligibility List (a.k.a. Master List) report are not always within the current school year. Staff explained that the start date reflects the date the most recent application was approved. Often times, this could be a date from a previous school year. If the school did not receive an application for a student, a \* symbol is indicated under the start date column. The "Expire Date" on the eligibility list represents the end of the 30-day carryover period in the current school year (9/13/2022). Based on the dates provided in this report, reviewers could not determine the eligibility start and end dates in the current school year based on the information provided in the Etrition Eligibility List (a.k.a. Master List).

**Corrective Action:**

1. Maintain eligibility "master list" documentation that reflects the current school year's eligibility start and end dates, and tracks dates such as changes in benefits, withdrawn students, termination of benefits, etc.
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.

**126. Certification Benefits/Issuance Review Method, applications correctly approved?****Finding 9000: Other Finding**

HCNP identified errors during the review process. The identified errors did not change eligibility.

- One application reviewed had one child listed twice, resulting in the incorrect number of household members being calculated. This did not change eligibility.
- On two applications reviewed, a child was listed twice. Although the application calculated the correct number of household members, the number of names provided on the application must match the number of household members calculated to determine eligibility.
- Some "Manual" applications have a signature date after the eligibility start date. The SFA contacted the software vendor and learned this was due to a "time zone issue," which has since been corrected. The SFA was asked to provide documentation that this issue has been corrected.

**Corrective Action:**

1. Maintain documentation that the time zone issue is resolved.
2. Create a Standard Operating Procedure (SOP) for reviewing free and reduced-priced applications in determining household eligibility.
3. Train all appropriate staff on the SOP.
4. Keep training documents (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.

**Technical Assistance:**

The SFA representative determining free and reduced-price applications must review documentation to ensure all information is correct. The SFA must follow up with the household when the information on the application is inconsistent or unclear. Any updates or changes based on household follow-up must be documented with the date, time, name of the household member contacted, and signed by the SFA staff member who verified missing or inconsistent information.

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)****Program Year 2023***129. Household notification consistent with Off-site Assessment responses?***Finding 9000: Other Finding**

Documentation was not provided to determine if the household notification of eligibility was consistent with the responses in the Off-site Assessment Tool.

**Corrective Action:**

1. Maintain household notification of eligibility letters to households showing that the notification letters meet USDA eligibility 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.

*130. Household notification of denied benefits consistent with FNS requirements?***Finding 9000: Other Finding**

Documentation was not received during the review to validate that the household notification of denied benefits was consistent with FNS requirements.

**Corrective Action:**

1. Maintain household notification of denied benefit letters to households showing that the notification letters meet FNS 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.

**Verification - Malama Honua Public Charter School (1442-7)***206. On-site observation validate Off-Site Assessment Tool responses to Verification questions?***Finding 9000: Other Finding**

The FNS-742 was not completed correctly. The SFA was required to update its most recent FNS-742. The SFA updated the application, and HCNP approved the updated FNS-742 on 3/3/2023.

**Corrective Action:**

The SFA updated the FNS-742 report, and HCNP approved the updated report on 3/3/2023. No further action is required.

*207. Verified applications on file match FNS-742 and Off Site question #200?***Finding 9036: Verified applications on file do not match number reported on FNS-742.**

The SFA's response to question #200 of the Off-site Assessment Tool and the number of Verified applications reported on the FNS-742 are inconsistent with the number of Verified applications on file. The SFA reported verification of one application, however, the Sponsor completed verification for two household applications.

**Corrective Action:**

1. Review the Eligibility Manual for School Meals.
2. Train all appropriate staff who verify applications.
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

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)****Program Year 2023**

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.

**208. Confirmation Review – documentation on file, required procedures followed?****Finding 9037: Confirmation review not conducted as required.**

All SFAs must complete a confirmation review of all meal applications within 30 days of eligibility determination. The SFA confirmed that for SY 22-23, all meal applications were reviewed by the confirmation official and verbal approval was granted. Verbal approval is not acceptable. The confirmation official must sign and date the form to indicate the application was confirmed.

**Corrective Action:**

1. Create a Standard Operating Procedure (SOP) for conducting confirmation reviews of free and reduced-priced applications that ensures confirmation reviews are completed and properly documented.
2. Train all appropriate staff on the SOP.
3. Maintain 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:**

All SFAs must complete a confirmation review of all meal applications within 30 days of the eligibility determination. The SFA confirmed that for SY 22-23, all meal applications were reviewed by the confirmation official, and verbal approval was granted. Verbal approval is not acceptable. The confirmation official must sign and date the form to indicate that the application was confirmed.

**211. Verification notification letter?****Finding 9044: Verification notification letter does not contain all required information.**

The SFA's verification notification letter does not include all required information, as follows:

- The notification letter does not provide information that the household may contact the SFA for assistance in completing this request.
- The request for information is required under the Richard B. Russell National School Lunch Act.
- The SFA's notification letter has an outdated version of the non-discrimination statement.

**Corrective Action:**

1. Update the verification notification letter to the most current version, ensuring it includes all of the required information. HCNP has a template notification letter available on its website under the Program Resources, Verification section.
2. Maintain documentation on file for all verification letters used for each household selected for verification.
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****Malama Honua Public Charter School (1442-7)****General Program Compliance - Malama Honua Public Charter School (1442-7)****808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?****Finding 9000: Other Finding**

The SFA did not cover the required topics during the civil rights training. The training slides also appear outdated because the images displayed in the training include the outdated "And Justice for All" poster.

**Corrective Action:**

1. Review the current Civil Rights training on the HCNP website.
2. Update the topics covered in the Civil Rights training to meet the USDA Civil Rights training requirements. SFAs may use HCNP's annual Civil Rights training to train appropriate staff.
3. Train appropriate staff on all required training topics.
4. Keep training documentation (sign-in sheet, date of training, and agenda) to confirm that training was completed with appropriate staff.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

**Technical Assistance:**

As a reminder, the Civil Rights Ethnic Data Report must be completed annually by October 31. An email reminder is sent out to SFAs annually, and the form can be found on HCNP's website: <https://hcnp.hawaii.gov/wp-content/uploads/2024/09/9.2024-O-4C-Ethnic-Data-Report-1.doc>

Civil rights topics should include, but are not limited to: collection and use of data; effective public notification systems; complaint procedures; compliance review techniques; resolution of noncompliance; requirements for reasonable accommodation of persons with disabilities; requirements for language assistance; conflict resolution; and customer service.

HCNP provides SFAs with annual Civil Rights training. Please refer to the Training Resources section on HCNP's website for HCNP's current Civil Rights training. Please provide staff with training on the below topics that were not included in MHPCS' Civil Rights training. The SFA must document that training was provided.

- Updates to the protected classes (sex - gender identity and sexual orientation)
- Requirements for Reasonable Accommodations
- Procedural Safeguards
- Requirements for Language Assistance for Limited English Proficiency (LEP) individuals

**808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?****Finding 9000: Other Finding**

The SFA does not use medical statement forms for students with life-threatening allergies and accepts letters from the student's physician as documentation for special dietary requests, which do not contain all the information required on a medical statement.

**Corrective Action:**

1. Update the SFA's medical statement form or consider using HCNP's Special Diets Medical Statement Form to ensure that all of the required information is collected for students who require a meal modification for special dietary needs. Submit the updated medical statement form that will be used by the SFA that includes all of the required information.
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

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)****Program Year 2023**

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:**

Medical statements must identify: the child's disability; an explanation of why the disability restricts the child's diet; the major life activity affected by the disability; the food(s) to be omitted from the child's diet; and the food(s) to be substituted. The SFA should consider using HCNP's Special Diets Medical Statement form template to ensure that all required information is collected for students who require a meal modification.

**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 any documentation that an annual or triennial assessment of the Local School Wellness Policy was completed.

The SFA did not provide documentation of the School Wellness Policy meetings.

**Corrective Action:**

1. Create a process to ensure an annual or triennial assessment of the Local School Wellness Policy is completed as required.
2. Keep documentation to support the annual or triennial assessment of the Local School Wellness Policy.
3. Keep meeting documentation (board minutes, meeting minutes, members in attendance, date of meeting) that support reviews of the Local Wellness Policy.
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.

**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 to show that the appropriate people were notified to be involved in the development, implementation, periodic review, and update of the School's Local School Wellness Policy.

The SFA did not provide documentation to show that they reached out to potential stakeholders to participate in the development, review, update, and implementation of the school's Local School Wellness Policy.

**Corrective Action:**

1. Establish wellness policy leadership of one or more SFA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy.
2. To meet the public involvement requirement in the wellness policy, add information on efforts to review and update the wellness policy, who is involved, and how stakeholders are aware of their ability to participate.
3. Keep documentation on file to show that the public requirement was met.
4. Please complete and submit the Attestation Report by checking the box next to the relevant finding and requirement area.

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.

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

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)*****Program Year 2023*****Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.**

All SFAs must maintain a current and compliant Local School Wellness Policy. During the Administrative Review, it was determined that the policy on file is not in compliance with all USDA requirements. The wellness policy does not limit the number of exempt fundraisers per school day per school campus each year.

**Corrective Action:**

1. Update the Local School Wellness Policy to ensure it includes all required USDA elements and complies with current guidelines.
2. Post the updated Local School Wellness Policy on the SFA's website for public access.
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.

***1214. Validate OFS #1204 - Did the School Nutrition Director meet annual training requirements?*****Finding 9000: Other Finding**

The SFA did not provide training documentation that the School Nutrition Program Director met the Professional Standards training requirements for the 2022/2023 school year.

**Corrective Action:**

1. Annually, the Director must complete a minimum of 12 hours of training relevant to their role and responsibilities.
2. Keep the training documentation on file to confirm that the Director completed the required 12 hours of training.
3. Track all training hours and information in the SFA's training log to ensure accurate and complete records.
4. Documentation of professional standards training showing that the Director completed the required 12 hours of relevant training must be kept for 3 years plus the current school year, or 6 years plus the current year, if following the Hawai'i State Department of Education requirement for recordkeeping. Consider using the USDA Professional Standards Training Tracker Tool or the HCNP Training Tracker Tool that is available on HCNP's website to document training hours.
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.

***1215. Validate OFS #1205 - Did School Nutrition Manager meet annual training requirements?*****Finding 9000: Other Finding**

The SFA did not provide training documentation that the School Nutrition Manager met the Professional Standards training requirements for the 2022/2023 school year.

**Corrective Action:**

1. Annually, the Manager must complete a minimum of 10 hours of training relevant to their role and responsibilities.
2. Keep the training documentation on file to confirm that the Manager completed the required 10 hours of training.
3. Track all training hours and information in the SFA's training log to ensure accurate and complete records.
4. Documentation of professional standards training must be kept for 3 years plus the current school year, or 6 years plus the current year, if following the Hawai'i State Department of Education requirement for recordkeeping. Consider using the USDA Professional Standards Training Tracker Tool or the HCNP Training Tracker Tool that is available on HCNP's website to document training hours.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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.

**1216. Validate OFS #1206 - Did School Nutrition personnel meet annual training requirements?****Finding 9000: Other Finding**

The SFA did not provide training documentation that the full-time and part-time staff met the Professional Standards training requirements for the 2022/2023 school year.

**Corrective Action:**

1. Annually, the full-time staff must complete a minimum of 6 hours of training relevant to their role and responsibilities, and part-time staff must complete a minimum of 4 hours of training that is relevant to their role and responsibilities
2. Maintain documentation on file to verify the completion of the required 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. Documentation of professional standards training must be kept for 3 years plus the current school year, or 6 years plus the current year, if following the Hawai'i State Department of Education requirement for recordkeeping. Records that list the employee name, employer/school, hiring date, Professional Standards job category, training title, topic/objectives, training source, dates, and total training hours would be appropriate to show compliance with professional standards training requirements.
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:**

Staff who work less than 20 hours per week in your school's meal program are considered part-time, even if they work more than 20 hours per week doing other non-NSLP-related tasks at your school. Thank you for promptly correcting your response to question #1209 in the OSAT.

**1217. Frequency of tracking training hours****Finding 9000: Other Finding**

The SFA did not provide documentation to determine the frequency with which training hours are tracked.

**Corrective Action:**

1. Each year, ensure that School Nutrition Program staff 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 will meet annual professional standards training requirements. 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 must be kept for 3 years plus the current school year, or 6 years plus the current year, if following the Hawai'i State Department of Education requirement for recordkeeping. Consider using the USDA Professional Standards Training Tracker tool or the HCNP Training Tracker Tool that is available on HCNP's website to document training hours.
6. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.



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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.

**1602. On-site observation validate Off-Site Assessment Tool responses to SFSP & SBP Outreach questions?****Finding 9000: Other Finding**

The SFA's public notice only mentions the availability of Seamless Summer Option (SSO) meal options and does not mention the availability of the free Summer Food Service Program (SFSP). SFA's must inform families of the availability and location of the free Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) meals.

**Corrective Action:**

1. Create a standard operating procedure (SOP) on how the SFA will inform households 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.
4. Training documentation and documentation demonstrating annual School Breakfast Program and Summer Food Service Program outreach must be kept for 3 years plus the current school year, or 6 years plus the current year, if following the Hawai'i State Department of Education requirement for recordkeeping.
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:**

SFA's must inform families of the availability and location of the free Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) meals. Please refer to the June 30, 2022 email, "ACTION REQUIRED: For ALL NSLP SFAS". This email provides information on SFSP outreach requirements and a list of SFSP and SSO sites that served meals last summer.



## SNP Administrative Review Findings Program Year 2023

Malama Honua Public Charter School (1442-7)

### Malama Honua (550-PCS)

41-054 Ehukai Street  
Waimanalo, HI 96795

Month of Review: December 2022

Date of Onsite Review: January 12, 2023

#### Technical Assistance

- \* Other Federal Programs Question: 1905.: FFVP Advertising

The SFA should find a visible place on campus to post the FFVP banner that protects it from environmental damage, such as wind.

### Meal Components & Quantities - Malama Honua (550-PCS)

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

##### Finding 9000: Other Finding

The production record for the day of review does not correctly document the meal component quantities for the fruit and vegetable components served. The meal preparation video (file #4) that was provided to the State Agency, around 15 minutes, indicated the SFA serves a 6-oz scoop of carrots and a 1/2 cup of apple. Production records indicated that 1/4 cup of carrots and 1/4 cup of apples were served. The SFA must ensure that meal documentation correctly identifies the meal components and quantities of the meals they produce and serve.

##### Corrective Action:

- 403. Create a Standard Operating Procedure (SOP) on accurately completing production records that demonstrate the meals being prepared and served to students.
- 404. Train appropriate staff on the SOP.
- 405. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
- 406. Maintain complete and accurate production records that document the meals planned, prepared, and served meet the USDA NSLP meal pattern requirements.
- 407. 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.

#### 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 grains to be served. The weekly requirement of 8 oz. eq. was not met for grades K-8 at lunch. 5.75 oz. eq. of grain was served throughout the week.

##### Corrective Action:

1. Complete training on NSLP meal pattern requirements and provide training to all relevant staff.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.
3. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
4. Complete the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

NOTE: This will be reviewed during the next Administrative Review to ensure corrective actions have been implemented by

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)****Program Year 2023**

the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

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

The menu did not meet milk requirements for grades K-8. Regulations require that at least two allowable milk types be offered with each meal daily. Only one milk type was offered during the review period.

**Corrective Action:**

1. Complete training on the National School Lunch (NSLP) meal pattern requirements.
2. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that meal pattern training was completed by appropriate staff.
3. Create a Standard Operating Procedure (SOP) to ensure that two allowable milk types are consistently available throughout the entire meal service period on all meal service lines. Include in the SOP what the SFA will do when the vendor does not provide two acceptable milk types.
4. Provide training to all relevant staff on the contents and implementation of the new SOP.
5. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the 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:**

The SFA stated that due to supply chain issues, only one milk type (1% unflavored) was offered during the review period (December 2022). Production records also reflect that only 1% milk was offered during the review period. SFAs must offer at least two varieties of milk at each meal service.

**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 for the Review Period 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.

Menu documentation is not consistent: transport records do not match the December menu or the Production Summary document. SFAs must ensure that any substitutions made are accurately recorded on the production record and menu.

**Corrective Action:**

1. Create a Standard Operating Procedure (SOP) on accurately completing production records that demonstrate the meals being prepared and served to students.
2. Train 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 complete and accurate production records that document the meals planned, prepared, and served meet the USDA NSLP meal pattern requirements.
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

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)****Program Year 2023**

the SFA. Therefore, at this time, for this finding, acknowledge to HCNP that the SFA understands the corrective actions that must be implemented to resolve the findings and provide assurance to HCNP that the corrective actions will be implemented.

**Technical Assistance:**

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

**General Program Compliance - Malama Honua (550-PCS)****811. Justice for All poster displayed in prominent location?****Finding 9000: Other Finding**

The "And Justice for All" poster is not the correct size. The poster was printed on 8" x 11" paper and displayed in the cafeteria.

**Corrective Action:**

1. Review the USDA "And Justice for All" poster requirements to ensure the poster meets USDA requirements.
2. Request additional posters from HCNP, or print and post the USDA "And Justice for All" poster that adheres to USDA requirements.
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.

**Technical Assistance:**

The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students, and the poster must be 11" wide x 17" high.

**901. On-site monitoring review completed prior to February 1?****Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.**

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without SA approval of an extension.

**Corrective Action:**

1. Complete an on-site review for all points of service prior to February 1 annually.
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 classrooms, are monitored annually.
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:**

Since the SFA does not participate in the School Breakfast Program, on-site monitoring of the breakfast service does not need to be completed. On-site monitoring of the lunch meal service must be completed annually by February 1 for all sites.

**SNP Administrative Review Findings****Malama Honua Public Charter School (1442-7)****Program Year 2023****902. On-site monitoring review – CA required, follow up conducted?****Finding 9107: Follow up review not conducted to ensure corrective action was implemented for errors identified in the school's meal counting and claiming procedures.**

An on-site follow-up review was not conducted within 45 days to ensure that corrective action was implemented.

**Corrective Action:**

1. Create a standard operating procedure (SOP) on how the SFA will ensure follow-up reviews are completed when the original onsite monitoring indicates deficiencies.
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 the 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:**

When "No" is a response to any onsite monitoring question, the SFA should provide retraining to all staff and conduct a follow-up review within 45 days.

If meals are served in the classroom, complete onsite monitoring of at least 25% of classrooms.

The onsite monitoring form should be completed by the manager. Results of the onsite monitoring must be reviewed with the school administration and the meal counter that was being reviewed. All parties need to sign the onsite monitoring form.

The onsite monitor should ensure that the entire monitoring form is completed. Question #10 was not completed with the number of students by eligibility status and meal counts for the day of review.

**1408. Temperature logs available?****Finding 9000: Other Finding**

The SFA did not provide temperature logs for thermometer calibration.

**Corrective Action:**

1. Review and train on the Standard Operating Procedures for temperature log requirements with the appropriate staff.
2. Train all individuals who are responsible for monitoring food temperatures.
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 actions will be implemented.

**Technical Assistance:**

The Sponsor must maintain temperature logs for all food storage areas, including thermometer calibration as noted in the SFA's food safety plan. The SFA must maintain completed temperature logs for at least six (6) months.

**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.**