



SNP Administrative Review Findings Program Year 2022

Windward Nazarene Academy (1438-9)

Windward Nazarene Academy (1438-9)

45-232 Puu'ae Road
Kane'ohe, HI 96744

No. of Sites / Reviewed: 1 / 1

Month of Review: April 2022

Date of Review: May 4-10, 2022

Exit Conference: May 10, 2022

Due Date for Corrective Action: August 6, 2025

Commendations

* Summary: Commendations.

The Windward Nazarene staff was friendly and accommodating when asked to provide additional information and answer questions about their meal service operations.

The lunch and afterschool snack services are organized and efficient. Students are well-behaved during the meal service.

Thank you for being flexible during HCNP's virtual Administrative Review, delivering documents to the HCNP office, recording meal service operations, and uploading documents via drop box links.

Suggestions

* Summary: Suggestions.

HCNP suggested that the SFA use sanitizer strips to monitor appropriate concentration levels in the 3-compartment sink and the solution for sanitizing surface tops.

Utilize the Food Buying Guide resources to ensure compliance with the NSLP and ASP meal pattern requirements.

General Program Compliance - Windward Nazarene Academy (1438-9)

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

Finding 9000: Other Finding

The SFA did not provide the steps and procedures that are in place to provide free language access services to LEP families.

Corrective Action:

The SFA provided a Language Access SOP on October 31, 2022. No further action is required.

Technical Assistance:

HCNP strongly recommends having procedures in place to provide free language access assistance to LEP families. The Hawaii State Department of Health's Office of Language Access (OLA) website has a list of individuals and agencies certified in language access services. Posted on the HCNP website is a waiver form template for families who decline free language assistance services.

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

Finding 9000: Other Finding

The SFSP outreach message to families does not use the full nondiscrimination statement.

Corrective Action:

1. Review and revise all documents to ensure they contain the current, complete USDA nondiscrimination statement. The current nondiscrimination statement is available at <https://hcnf.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>. Review the document. The full statement is everything listed in the large box

SNP Administrative Review Findings**Windward Nazarene Academy (1438-9)*****Program Year 2022***

on the document.

2. Keep documentation demonstrating that the corrections were made to the program materials.
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.

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 submit a public release for the current school year as required in 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.

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

All SFAs must maintain a current and compliant Local Wellness Policy (LWP). During the Administrative Review, it was determined that the policy on file does not comply with all USDA requirements.

- The LWP does not include how the wellness policy compares to model wellness policies on page 4 of the revised LWP (under the Triennial Progress Assessment section).
- Pages 5, 6, 9, and 10 do not identify the school district by name (For example: "The District offers reimbursable school meals that meet USDA nutrition standards").
- The Local Wellness Policy does not include food and beverage marketing policies. Refer to the LWP summary and final rule https://fns-prod.azureedge.us/sites/default/files/resource-files/LWPsummary_finalrule.pdf.

Corrective Action:

1. Review the Local Wellness Policy to ensure it includes all required USDA elements and complies with current guidelines.
2. Update and add to the bullet points on Page 4 for the Triennial Progress Assessment section to include: The extent to which the local school wellness policy compares to model local school wellness policies
3. Please update pages 5, 6, 9, and 10 to identify the school district by name. For example, Windward Nazarene Academy, not "The District."
4. Update the Local School Wellness Policy to include food and beverage marketing policies. Refer to the LWP summary and final rule https://fns-prod.azureedge.us/sites/default/files/resource-files/LWPsummary_finalrule.pdf.
5. Post the updated Local School Wellness Policy on the SFA's website for public access.
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



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

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

Documentation to support an assessment of the Local Wellness Policy was not provided during the Administrative Review.

Corrective Action:

1. Complete the assessment of the wellness policy and make the assessment available to the public. A link to Local Wellness Policy resources can be found on the HCNP website at the following link: <https://hcnp.hawaii.gov/overview/nslp/>.
2. Keep documentation on file to show that the public requirement was met
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1602. On-site Validation of SFSP & SBP Outreach?

Finding:

Outreach to Midweek and Star Advertiser was noted. However, the SFA did not provide documentation to show the memo was sent to Midweek or Star Advertiser.

Corrective Action:

The Sponsor provided a copy of the Summer Food Service Program (SFSP) outreach on June 3, 2022. No further action is required.

Technical Assistance:

Technical assistance provided to address discrepancies or deficiencies in the SFA's SFSP Outreach procedures identified from the Off-site Assessment Tool: The SFA should maintain documentation to support outreach was conducted. This may include but not limited to; copy of advertisement in paper, social media, school website, and copies of emails.



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

Windward Nazarene Academy (809-PS)

45-232 Puaae Road
Kane'ohe, HI 96744

Month of Review: April 2022
Meal Observation: April 18, 2022

Technical Assistance

- * Meal Components & Quantities: Food Buying Guide Resources

Shared available resources such as the "FBG Calculator - My Shopping List," the Recipe Analysis Workbook (RAW), and the Food Buying Guide training video. <https://foodbuyingguide.fns.usda.gov/>. Web-based training videos are also available through the Institute of Child Nutrition (ICN) ilearn platform. <https://theicn.org/icn-ilearn/>.

Meal Counting & Claiming - Windward Nazarene Academy (809-PS)

320. DOR - meal counts combined and recorded correctly? Enter Data.

Finding 9000: Other Finding

The State agency's validated lunch meal counts for the review date (04/18/2022) do not match the SFA's claim for reimbursement for that day. Specifically, the SFA claimed 136 free lunches, while the reviewer validated 135 free lunches. This discrepancy indicates a systemic error in the SFA's meal counting and claiming procedures, likely due to inadequate daily tally sheet reconciliation or the lack of a second-party check to validate meal counts before claim submission.

The reviewer counted 30 tally marks for the second lunch service tally sheet; the site claimed 31.

Corrective Action:

1. To correct this finding, submit a standard operating procedure (SOP) of the new/revised meal counting and claiming process that will be implemented to ensure an accurate meal counting and claiming system, including the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance. Include in the meal counting and claiming procedures internal controls for double checking all meal counts prior to submitting the claim for reimbursement.
2. Train all appropriate staff on the SOP.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Maintain training documentation and all meal counting documentation for at least three years plus the current year, or until the resolution of any audits.
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.

325. Review Period meal counts by category correctly used in the claim? Enter data.

Finding 9000: Other Finding

The SFA's claim for the school for the Review Period does not match the State agency's validated meal counts for the Review Period. The problem is considered systemic because the sponsor does not have a system in place to prevent the errors from occurring in the future. The SFA must include performing second-party checks of all tally sheets and daily edit checks in their process to ensure the daily meal counts are correct before filing a claim for reimbursement.

For April 2022, meal counting errors resulted in an overclaim of 1 lunch.
• 04/01/2022 underclaim 1 meal (Grade 4b)

SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

- 04/04/2022 underclaim 1 meal (Grade 4b)
- 04/05/2022 underclaim 1 meal (Grade 4b)
- 04/06/2022 underclaim 1 meal (Grade 4b)
- 04/18/2022 overclaim 1 meal (2nd lunch totaled incorrectly)
- 04/20/2022 overclaim 1 meal (1st lunch totaled incorrectly)
- 04/27/2022 overclaim 1 meal (Grade 4b)
- 04/29/2022 overclaim 2 meals (Grade 3b)

Corrective Action:

1. To correct this finding, submit a standard operating procedure (SOP) of the new/revised meal counting and claiming process that will be implemented to ensure an accurate meal counting and claiming system, including the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance. Include in the meal counting and claiming procedures internal controls for double checking all meal counts prior to submitting the claim for reimbursement.
2. Train all appropriate staff on the SOP.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Maintain training documentation and all meal counting documentation for at least three years plus the current year, or until the resolution of any audits.
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.

Meal Components & Quantities - Windward Nazarene Academy (809-PS)

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

Finding 9000: Other Finding

The SFA does not maintain documentation (Child Nutrition Labels or Product Formulation Statements) that the meal components served meet meal pattern requirements. On the day of the meal observation (04/18/2022), the SFA credited the ham and cheese on the sandwich as 2 oz eq meat/meat alternate. The SFA provided a nutrition facts label for the ham. However, a production formulation statement was not provided to determine the meat crediting for the ham. Therefore, the reviewer could not determine if the minimum daily meat/meat alternate requirement during the meal observation was met for the age/grade group served.

A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was met.

During the week of review (04/04/2022-04/08/2022), there were instances where proper supporting documentation was not provided to validate the crediting of menu items.

- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the pulled pork and teriyaki chicken. A nutrition facts label was submitted, but a CN Label or PFS is needed.

The SFA must maintain current product documentation and nutrition facts labels from the manufacturer for commercially prepared foods. Nutrition facts labels were not submitted for the following menu items:

- Tortilla. A portion of the label was submitted, but the full nutrition facts label is needed, including the ingredient label to verify the whole grain contribution.

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. Standardize the recipes so that true yields and portion sizes can be determined. To be standardized recipes, the recipes must include at a minimum the following:

- All ingredients in the recipe.

SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

- Correct volume or weighted measure of each ingredient.
- Serving/portion sizes for each grade group.
- The true yield made by the recipe.
- Clear and complete preparation steps and directions.

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

- Corn Chowder
- Cheese Sandwich
- Chicken Burrito Tacos
- Fish Sticks

The recipes provided did not have accurate measurements to equal the 192 servings. For example, the Chicken Taco Burrito stated 5.34 pkg. of tortillas. Each package has 12 tortillas. $5.34 \times 12 = 64$ tortillas but the instructions indicate one tortilla each. All recipes need to be reviewed to ensure accuracy.

Corrective Action:

1. Create a Standard Operating Procedure (SOP) to ensure that all menu documentation and supporting documentation are maintained to support meals being prepared and served that meet all meal pattern requirements, including maintaining product formulation statements, child nutrition labels, and standardized recipes that identify the crediting of food items.
2. Train the appropriate staff on the SOP.
3. Keep training documentation (sign-in sheets, date of training, agenda) to confirm that the appropriate staff were trained.
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 must ensure that Child Nutrition labels or Product Specification Statements are maintained in order to document an item's compliance with the meal pattern. The SFA should have a folder or a binder to keep labels for all menu items, so that they are easy to find and can be referenced when determining menu compliance.

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

The menu signage displayed during the lunch meal service indicated milk or water as beverage options. Signs describing the reimbursable meal must convey that milk is offered as a food component in a reimbursable meal and not as a beverage choice.

Corrective Action:

1. Update reimbursable meal signage to meet regulatory requirements and remove promotion of any other beverage that restricts or limits milk consumption.
2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

The whole grain-rich requirement was not met for the week of review. The menu offered 55% whole grains for the week of review for grades K-8. In SY 2021-2022, the whole grain-rich requirement was all grains offered must be whole grain-rich. The current whole grain-rich requirement is at least 80% of grains offered weekly must be whole grain-rich.



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

The following products were not whole grain-rich. Increase the amount of whole grain-rich products offered to at least 80% of the weekly grain offerings.

- Hamburger bun
- Tortilla

Corrective Action:

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

Finding 9000: Other Finding

The weekly vegetable subgroup requirements must be met for each grade group. For the week of 04/04/2022 - 04/08/2022, the 3/4 cup weekly red/orange vegetable subgroup requirement was not met for grades K-8, with only 5/8 cup offered.

Consider the following suggestions to help meet this requirement.

- Increase carrots to 1/2 cup served on Thursday 04/07/2022

Corrective Action:

1. Update menus 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.

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

The federal regulations require menus to be planned that meet the 1.5 oz. eq. meat/meat alternate requirement for Pre-K students. This requirement was not met on Thursday, 04/07/2022, with only 1 oz. eq. offered.

Consider the following suggestions to help meet requirements.

- Increase the cheese for the cheese sandwich to 1.5 oz serving, by weight. At 19 g/slice, this would be about 2.25 slices of cheese.

Corrective Action:

1. Update menus 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.

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 - Windward Nazarene Academy (809-PS)

811. Justice for All poster displayed in prominent location?

Finding 9000: Other Finding



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

The SFA had an outdated "And Justice for All" poster displayed.

Corrective Action:

1. Prominently post the current USDA non-discrimination poster ("And Justice for All") in the area where meal services are provided.
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:

Replace the old "And Justice for All" poster (Statue of Liberty pictured) with the current poster mailed to the SFA.

902. On-site monitoring review – CA required, follow up conducted?

Finding 9000: Other Finding

The SFA noted on their on-site monitoring form that they "should train teaching staff, also outside assistants" with regards to is someone trained as a backup for the monitor and the meal counter. The SFA did not provide supporting documentation that the teaching staff and outside assistants were trained.

Corrective Action:

1. Provide training for the teaching staff and outside assistants.
2. Maintain training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the teaching staff and outside assistants.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1404. Food safety plan - written, copy available?

Finding 9000: Other Finding

The Food Safety Plan is not complete and is missing current information.

- The food safety plan review sheet is not completed.
- The person responsible for recordkeeping referenced on Page 20 of the food safety plan is no longer employed at the SFA. Please update with the current name or note the job title of the person responsible.

Corrective Action:

1. Review and update the food safety plan review sheet.
2. Keep the completed food safety plan review sheet on file.
3. Revise page 20 with the current name or note the job title of the person responsible for food safety recordkeeping.
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:

During the annual review of the Food Safety Plan, the SFA should ensure that all information is complete and accurate.



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

1406. Most recent Food safety inspection posted, visible to public?

Finding 9000: Other Finding

The SFA did not provide documentation to demonstrate that the most recent food safety inspection is posted in a location visible to program participants.

Corrective Action:

1. Post the most recent food safety inspection.
2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1408. Temperature logs available?

Finding 9000: Other Finding

The equipment temperature logs do not indicate that the SFA is recording the actual time temperatures were recorded. The April 2022 equipment temperature logs were submitted. The same times were noted for each date entry. For example, the 3-door freezer, 3-door refrigerator, chest freezer, and milk cooler times are written as 6:30 am and 3:30 pm daily on the temperature log. In addition, the dishwasher times are noted as 7:00 am and 2:00 pm every day in April. It appears the kitchen staff records temperatures at regular times during the day. However, it is important to note the exact time on the time/temperature logs. For example, at 6:30 am, the temperature was documented for the 3-door freezer and the 3-door refrigerator. The time/temp for the chest freezer and milk cooler might be 6:31 or 6:32 am.

Corrective Action:

1. Complete temperature logs and accurately report the time temperatures were recorded. For example, at 6:30 am, the temperature was documented for the 3-door freezer and the 3-door refrigerator. The time/temp for the chest freezer and milk cooler might be 6:31 or 6:32 am.
2. Maintain temperature logs on file to demonstrate compliance.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Other Federal Programs - Windward Nazarene Academy (809-PS)

4. Snacks properly counted and claimed? Enter data.

Finding 9221: Snacks are not being properly counted and claimed.

The SFA and SA counts for the review period do not match. The edit check worksheet indicates 1,827 free snacks were served during the review period. The SFA claimed 1,830 free snacks. The claim does not match the edit check worksheet. The reviewer validated 1,759 free snacks. For April 2022, meal counting errors resulted in an overclaim of 71 free snacks.

The errors found were:

4/13/2022: The reviewer counted 102 tally marks; the edit check indicated 107 meals served; the SFA claimed 110, resulting in an overclaim of 8 snacks.

4/14/2022: The reviewer counted 41 tally marks; the SFA claimed 90, resulting in an overclaim of 49 snacks.

4/19/2022: The reviewer counted 69 tally marks; the SFA claimed 83, resulting in an overclaim of 14 snacks.



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

- 4/20/2022: The reviewer counted 91 tally marks; the SFA claimed 97, resulting in an overclaim of 6 snacks.
4/21/2022: The reviewer counted 90 tally marks; the SFA claimed 99, resulting in an overclaim of 9 snacks.
4/22/2022: The reviewer counted 97 tally marks; the SFA claimed 87, resulting in an underclaim of 10 snacks.
4/26/2022: The reviewer counted 98 tally marks; the SFA claimed 93, resulting in an underclaim of 5 snacks.

The SFA is not completing the daily snack count forms in its entirety. The daily tally marks are not being totaled daily or before transferring to the daily edit check worksheet.

The daily afternoon snack checklist for K-4 has 19 tally marks in an undated column between 4/14/2022 and 4/18/2022. There is no explanation why snacks were marked on a non-serving day or an indication that the counts belong to another serving day.

Corrective Action:

1. To correct this finding, submit a standard operating procedure (SOP) of the new/revised meal counting and claiming process that will be implemented to ensure an accurate meal counting and claiming system, including the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance. Include in the meal counting and claiming procedures internal controls for double checking all meal counts prior to submitting the claim for reimbursement.
2. Train all appropriate staff on the SOP.
3. Submit training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Maintain training documentation and all meal counting documentation for at least three years plus the current year, or until the resolution of any audits.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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6. Menu, Meal Patterns, Production Records?

Finding 9226: Production records do not support that planned portion sizes meet meal pattern component requirements.

Production records do not demonstrate that the planned portion sizes for the fruit component meet the Afterschool Snack Program meal requirements for the age/grade groups served. The minimum daily fruit component requirements for the afterschool snack program is $\frac{1}{2}$ cup for the Pre-K age/grade group, and $\frac{3}{4}$ cup for the K-8 age/grade group. Fruits were served on 4 of the 5 days of the review period (4/4/22, 4/5/22, 4/6/22, 4/7/22) and did not meet the minimum serving requirement of fruits.

The errors identified:

Pre-K:

4/4/2022: $\frac{1}{4}$ cup of fruit was served

4/7/2022: $\frac{1}{4}$ cup of fruit was served

K-8:

4/4/2022: $\frac{1}{2}$ cup of fruit was served

4/5/2022: $\frac{1}{2}$ cup of fruit was served

4/6/2022: $\frac{1}{2}$ cup of fruit was served

4/7/2022: $\frac{1}{4}$ cup of fruit was served

Corrective Action:

1. Review the following meal pattern requirements:

CACFP Afterschool Snack Program meal pattern requirements (follow the requirements for the appropriate preschool age group): <https://www.fns.usda.gov/cacfp/nutrition-standards/snack-meal-pattern>.

NSLP Afterschool Snack Program meal pattern requirements:

https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/Chart2_FBG_Afterschool_Snacks_Program.pdf.

2. Update menus to comply with the Afterschool Snack Program (ASP) meal pattern requirements.



SNP Administrative Review Findings

Windward Nazarene Academy (1438-9)

Program Year 2022

3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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7. Site monitored in first 4 weeks of operation, date, deficiencies/CA?

Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first 4 weeks of operation each year.

Upon review of the Afterschool Snack Program, it was determined that the SFA did not complete the required on-site monitoring within the first four weeks of operation. USDA regulations require that the Afterschool Snack Program Review Form be completed once within the first four weeks of the program's start and once more later in the school year to ensure compliance with program requirements.

Corrective Action:

1. Conduct on-site monitoring of the Afterschool Snack Program at least twice per school year—once within the first four weeks of operation and once again later in the year.
2. Maintain documentation on file to verify that Afterschool Snack Program monitoring was completed as required, including the Afterschool Snack Program Review Form.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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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.