



SNP Administrative Review Findings

Ho'okāko'o Schools (1443-5)

Program Year 2023

Ho'okāko'o Schools (1443-5)

1360 S. Beretania Street
Suite 204
Honolulu, HI 96814

No. of Sites / Reviewed: 3 / 1

Month of Review: January 2023

Dates of Review: February 21-27, 2023

Exit Conference Date: February 27, 2023

Due Date for Corrective Action: **September 4, 2025**

Commendations

* Sponsor: Documentation

Thank you for submitting documentation in a timely manner. The required documentation was very well-organized and thorough.

* Sponsor: Visual Observations

Great job providing HCNP with visual observations of your meal services! We appreciate your efforts and flexibility.

* Sponsor: Kitchen

The kitchen was clean and organized. Staff work together efficiently and meal services ran on-time.

* Sponsor: Meals

Meal looked appealing and appetizing. We commend your commitment to offering students a wide variety of nutritious food options every day, throughout their entire school day across all child nutrition programs.

* Other Federal Programs (SSO): Commendation

Thank you for providing the requested documentation promptly.

* Other Federal Programs (SSO): Commendation

The kitchen is clean and organized.

Technical Assistance

* Sponsor: Renewal Site Application

In the SY 22-23 NSLP renewal site application and in the offsite assessment tool (OSAT), the SFA indicated that there is only one meal service line at Kamaile Academy. This is not correct. Meals are counted and served to Pre-K students in a separate dining area and meals are served to the SPED students in their classrooms. The SFA made the necessary revisions to the site application. Please remember to submit the completed 'On-Campus Meal Service and Counting Locations' offline form.

* Sponsor: Dietary Specification Requirements

Please keep in mind that meals must meet certain dietary specifications. Staff should be consistent in enforcing limits on food items such as condiments to prevent being out of compliance with dietary specifications requirements.

* Other Federal Programs (SSO): Offer vs serve

School is implementing offer vs. serve (OVS) for SSO, however, all of the required meal components were pre-plated except for



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the milk. The School Food Services Manager stated that if a child did not want a meal component, they would not need to take that meal component. Technical assistance was provided on bundling and pre-plating under OVS: the child must have the opportunity to select 3 meal components (including 1/2 cup fruit or vegetable).

- * Other Federal Programs (SSO): Production records & rounding

Remember to include condiments/extra items such as the salsa on the production record. Also, remember to round up when calculating the total amount needed for a food item to ensure that your documentation demonstrates that enough food was provided.

- * Other Federal Programs (SSO): Summer Outreach

The list of other locations that are offering free summer meals is posted on the SFA's website, but was not distributed by the school. The school should also provide this information on the school's website or include a link that directs people to the SFA website to obtain this information.

- * Other Federal Programs (SSO): Documentation of summer outreach

When maintaining documentation of summer outreach, remember to document the date of the advertisement. For example, if you are not able to keep a visual printout of text messages that were sent, please keep a record of the date that the message was sent.

Suggestions

- * Sponsor: Meal Service Line

Reviewers observed students re-entering the meal service line to get a utensil or milk that they forgot to take. This caused students to bump into each other and may have made it difficult for the meal counter to take an accurate count of reimbursable meals. Consider placing an additional utensil holder in the cafeteria and an additional container of milk on the table next to the meal counter (that is being monitored) to prevent students from re-entering the meal service line.

- * Sponsor: Meal Counting

Methods to address concerns about meal counting (see below corrective action section) were discussed for the SFA's consideration. These included:

Implement a computerized POS system that will allow student IDs to be scanned and/or student names to be entered into the system. This may help to ensure that each student is counted individually and may prevent non-reimbursable meals from being counted.

Ask students to stop in front of the meal counter before exiting the meal service line. This will allow the meal counter adequate time to mark each student on the meal counting sheet individually.

- * Sponsor: Breakfast Line

Kitchen staff were stationed at the Wiki Breakfast line to remind students to take the appropriate number of food items and meal components to get a reimbursable meal. Consider placing additional signage on the salad bar stations to reinforce this message.

- * Other Federal Programs (SSO): Summer Outreach

Remember to share summer outreach and any changes to operational dates with the FSMC to help with ordering and planning for meal service.

SNP Administrative Review Findings**Ho'okāko'o Schools (1443-5)****Program Year 2023****Meal Counting & Claiming - Ho'okāko'o Schools (1443-5)****313. On-site observation validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions?****Finding 9000: Other Finding**

The School Food Authority (SFA) operates the point of service in a manner that allows second meals to be counted and claimed, as well as missed reimbursable meals. This practice does not align with USDA meal counting and claiming procedures, potentially leading to inaccurate reimbursement claims.

- Students pass the meal counter without stopping, or students are clustered together as they pass the meal counter. This would make it difficult for the meal counter to take an accurate count.
- Students re-enter the meal service line to get a utensil or because they forgot to take an item that they wanted. This causes congestion in the meal service line and could make it difficult for the meal counter to take an accurate count.
- The current system relies on the meal counter's memory to determine if a student returns to the meal service line and takes a second meal.

Corrective Action:

1. Review the point of service procedure to identify improvements in the process where students are clustering, re-entering the line, or otherwise causing inaccuracies in meal counting and claiming.
2. Update the point of service procedure to address the identified issues and implement the revised process to ensure accurate counting and claiming of reimbursable meals.
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.

General Program Compliance - Ho'okāko'o Schools (1443-5)**808. On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?****Finding 9000: Other Finding**

The complaint procedure currently indicates that the Executive Director shall render a decision regarding civil rights complaints. Civil rights complaints must not be handled internally by the SFA. Civil rights complaints must be forwarded to the State Agency within 5 business days.

The SFA's procedures for receiving and processing discrimination complaints must adhere to specific requirements. Currently, the procedures do not fully comply with the following requirements:

- Verbal or in-person complaints: If an allegation is made verbally or in person, the person receiving the complaint must transcribe it.
- Complaint acceptance: The procedures should not prevent the acceptance of any complaint.
- Forwarding complaints: Procedures must specify that complaints will be forwarded to the State Agency.
- Resolution: The procedures should not suggest that the SFA attempts to resolve complaints internally before forwarding them, nor should the SFA's complaint process be a prerequisite for accepting a complaint.

Corrective Action:

1. Create and implement a revised Civil Rights Complaint Procedure that ensures all civil rights complaints are forwarded directly to the State Agency without attempting internal resolution. The procedure should not include any steps for resolving complaints within the SFA.
2. Annually review the Complaint Procedure as part of the Civil Rights training to ensure it remains compliant with USDA regulations.
3. Maintain a copy of the Complaint Procedure on file for reference and compliance purposes.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

The summer meal flyer, breakfast outreach flyer, and CEP published media release do not contain the USDA nondiscrimination statement. All program materials must include the current USDA nondiscrimination statement.

Corrective Action:

1. Review and revise all documents to ensure they contain the current, complete USDA nondiscrimination statement. 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.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

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.

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.

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

The SFA has not made the results of the most recent assessment of the Local School Wellness Policy available to the public.

Corrective Action:

1. Make the most recent assessment of the Local School Wellness Policy available to the public.
2. Maintain documentation on file confirming the most recent assessment of the Local School Wellness Policy was made available to the public.
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

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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 Nutrition Program Director did not meet the professional standards training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Nutrition Program Directors are required to complete a minimum of 12 training hours per year. Training may be obtained in person, online, through local meetings, webinars, conferences, etc. Directors hired on or after January 1 must meet a minimum of one-half the training requirement.

Corrective Action:

1. Annually, the Director must complete a minimum of 12 hours of training relevant to their role and responsibilities.
2. Maintain documentation on file to verify the completion of the required 12 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. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

The Nutrition Program Manager(s) did not meet the professional standards training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Nutrition Program Managers are required to complete a minimum of 10 training hours per year. Training may be obtained in person, online, through local meetings, webinars, conferences, etc. Managers hired on or after January 1 must meet a minimum of one-half the training requirement.

Corrective Action:

1. Annually, the manager must complete a minimum of 10 hours of training relevant to their role and responsibilities.
2. Maintain documentation on file to verify the completion of the required 10 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. 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.

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

School Nutrition staff did not meet the professional standards training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

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Full-time School Nutrition staff members (working 20 hours or more per week) are required to complete a minimum of 6 training hours per year. Training may be obtained in person, online, through local meetings, webinars, conferences, etc.

Part-time School Nutrition staff members (working less than 20 hours per week) are required to complete a minimum of 4 training hours per year. Training may be obtained in person, online, through local meetings, webinars, conferences, etc.

Any staff members hired on or after January 1 must meet a minimum of one-half the training requirement.

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 must complete a minimum of 4 hours of training 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. 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.

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

The SFA is not tracking School Nutrition Program staff training hours and has no formal tracking mechanism for professional standards.

Documentation of professional standards training should be kept for a minimum of 3 years plus the current school year. Records that list the employee name, employer/school, training title, topic/objectives, training source, dates, and total training hours would be appropriate to show compliance with professional standards training requirements.

Corrective Action:

1. Create and implement a tracking mechanism for monitoring professional standards training to ensure that all required information is captured. HCNP recommends utilizing the USDA Professional Standards Training Tracker Tool (available on USDA's website) or HCNP's Training Tracker Tool (available on HCNP's website).
2. Maintain a training tracking tool to document training hours and other necessary information.
3. Track all training hours and details in the SFA's training log to ensure the accuracy and completeness of records.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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1400. Food safety plan – contain required elements, copy available at each school?**Finding 9142: The written food safety plan does not contain all the required elements.**

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements: Standard Operating Procedures

Corrective Action:

1. Create Standard Operating Procedures (SOPs) and add them to the food safety plan. A food safety program template and SOP templates are available on HCNP's website.
2. Sign and date the SOPs annually to show that an annual review was completed.
3. Train all appropriate staff on the SOPs.



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4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Other Federal Programs - Kamaile Academy PCS (275-PCS)

1802. *Changes in dates of operation from approved dates?*

Finding 9236: SFA operating Seamless Sumemr Option site on dates not approved.

SFA originally stated and was approved by HCNP to begin SSO meal service operations on May 30, 2023. However, meal service actually began on June 5, 2023.

Corrective Action:

Ensure that the site application for Kamaile Academy is entered correctly to show that SSO meal service operations began in June 2023. Assure HCNP that the SFA will notify HCNP and make the appropriate updates to advertisements if there are any changes to program start/end dates and/or times.

The SFA was assigned a deadline of Friday, July 21, 2023 or unless otherwise specified by HCNP (pending potential updates to HCNP Systems application system) to complete the corrective action. The SFA completed the necessary corrective action by the assigned deadline. No further action required.



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Kamaile Academy PCS (275-PCS)

1360 S. Beretania Street
Suite 204
Honolulu, HI 96814

Month of Review: January 2023

Date of Onsite Review: February 21, 2023

Technical Assistance

- * General Program Compliance Question: 1406.: Food Safety Inspection

The most recent food safety inspection was not posted in a publicly visible location. This was corrected immediately.

Other Federal Programs - Kamaile Academy PCS (275-PCS)

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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10. Non-discrimination poster displayed, visible to participants?

Finding 9232: The USDA/FNS approved non-discrimination poster is not displayed and visible to program participants.

The most current, USDA-approved "And Justice for All" non-discrimination poster is not prominently displayed in the area where Afterschool Snack Program meal service is conducted. USDA regulations require this poster to be clearly visible to program participants.

Corrective Action:

1. Prominently post the current USDA-approved non-discrimination poster ("And Justice for All") in the area where snack meal service is provided.
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



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Meal Counting & Claiming - Kamaile Academy PCS (275-PCS)

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

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

On the Day of Review, it was observed that each type of meal service line did not provide an accurate count by eligibility category at the point of service. Specifically, 10 meals were not counted at the point of service but were instead picked up by staff and counted before the students received their meals. This practice does not align with the USDA's requirement that meal counts must be taken at the actual point of service. This finding will result in fiscal action.

Corrective Action:

1. To correct this finding, submit a detailed explanation of the new/revised process that will be implemented to ensure an accurate meal counting and claiming system include the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.
2. Train all appropriate staff on the new process. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Meal Components & Quantities - Kamaile Academy PCS (275-PCS)

501. Cafeteria staff trained on OVS?

Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.

It was found that the food service staff have not been properly trained to implement Offer vs. Serve (OVS). Although all meals served on the Day of Review were reimbursable and met OVS requirements, the SFA must maintain documentation to verify that OVS training is conducted annually for all relevant staff.

Corrective Action:

1. Conduct Offer vs. Serve (OVS) training with all appropriate food service staff to ensure proper understanding and implementation.
2. Ensure that all relevant staff receive and complete the OVS training annually.
3. Maintain documentation of the training, including a sign-in sheet, training date, and agenda or training materials, to verify that training was completed with the appropriate personnel.
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 school was provided technical assistance during the on-site visit.

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*Program Year 2023***Ho'okāko'o Schools (1443-5)***502. DOR - Signage explaining OVS reimbursable meal near/at beginning of service line?***Finding 9080: No signage explaining what constitutes a reimbursable meal under Offer vs. Serve.**

OVS signage was not posted at the meal service line. USDA regulations require that signage clearly explaining what constitutes a reimbursable meal, including the requirement to select at least ½ cup of fruit or vegetable, be prominently displayed at the beginning of the meal service line to guide students in making appropriate selections.

Corrective Action:

1. Post clear and visible signage at the beginning of the meal service line that explains what constitutes a reimbursable meal under OVS, including the requirement to select at least ½ cup of fruit or vegetable.
2. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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General Program Compliance - Kamaile Academy PCS (275-PCS)*901. On-site monitoring review completed prior to February 1?***Finding 9000: Other Finding**

It was found that the required on-site monitoring form was not completed by February 1 of the current school year for all points of service. Meals counted in the classroom were not included in the on-site review.

Corrective Action:

1. Ensure that all required on-site monitoring of meal counting and claiming procedures is completed by February 1 of each school year for all points of service, including classrooms and alternate meal service areas.
2. Maintain documentation on file for all on-site monitoring conducted, including dates, findings, and any corrective actions taken.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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*1405. Food safety inspection dates?***Finding 9146: Less than 2 food safety inspections were done in the current school year and no documentation that 2 inspections have been requested.**

SFAs are required to ensure that each participating school receives at least two food safety inspections each school year. The SFA has not received two inspections during the current year and did not receive two inspections during the previous year, and the SFA did not request two food safety inspections from the local health department. If two inspections are not received, the SFA must submit a request to the State Department of Health Sanitation Branch to have two inspections completed each school year. Maintain documentation of the request to demonstrate compliance.

Corrective Action:

1. Ensure that two food safety inspections are completed each school year for each site in the SFA. If two food safety inspections have not been completed, submit a request for two food safety inspections from the State Department of Health Sanitation Branch each school year.



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2. Keep documentation on file that two food safety inspections were either completed by or requested from the local health department.
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.