



SNP Administrative Review Findings

Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

Program Year 2020

Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

8135 Kekaha Rd
Kekaha, HI 96752

No. of Sites / Reviewed: 1 / 1

Month of Review: January 2020

Date of Review: February 6-7, 2020

Exit Conference: February 7, 2020

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

Commendations

- * Sponsor: Commendations.

The kitchen was very clean and orderly.

The binder with NSLP documents was organized and ready upon arrival.

The staff was open to assistance and willing to work with all reviewers.

Technical Assistance

- * General Program Compliance Question: 1217.: Professional Standards

Technical assistance was provided that the SFA must retain sign-in sheets, agendas, and certificates of completion to support verification of training hours. The SFA will continue to log training hours on the USDA professional standards training tracker tool.

The hiring dates for the food service director and the food service manager are incorrect on the training tracker log. The SFA was advised to update the hire dates.

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

The most recent food safety inspection was not posted. The most recent food safety inspection must be posted in a visible location. The SFA replaced the posted inspection with the most recent food safety inspection while the reviewer was onsite. No further corrective action required.

- * Meal Components & Quantities Question: 402.: Milk Quantities

Staff was not providing $\frac{3}{4}$ cup serving of milk to Pre-K students during meal service. The reviewer pointed this out, and the sponsor corrected it during meal service. Technical assistance was provided that Pre-K requires a minimum of 6 oz of milk and K-12 requires a minimum of 8 oz of milk.

Suggestions

- * Sponsor: Serving Line Efficiency

Before and during meal service, lay out all plates on serving tables, then add each item, one by one, to all plates (as opposed to serving all items on each plate before moving to the next). This will improve serving line efficiency.

- * Sponsor: Menu Signage

Create laminated food item labels for use on menu signage at the beginning of the line. You can add Velcro to the poster and the back of each food item label, then swap items out on a daily basis according to what is served.

- * Sponsor: Milk Purchase Options



SNP Administrative Review Findings

Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

Program Year 2020

Assess options for purchasing milk. Cafeteria staff expressed their challenges in purchasing allowable milk types and milk that is not spoiled or expired. Consider pre-ordering milk for delivery, or shelf-stable milk, if available.

* Sponsor: Offer versus Serve

Offer versus serve (OVS) is not required for any grade at breakfast. Consider discontinuing OVS at breakfast. This may help cafeteria staff expedite meal service and permit the cook to concentrate on meal counting. If changes are made, be sure to update the site application.

Resource Management Comprehensive Review - Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

757. Allowable Costs Test

Finding 9000: Other Finding *Repeat Finding

Found unallowable expense in the nonprofit food service account.

Corrective Action:

Remove the expenditures for the unallowable expenses in the nonprofit food service account. Send updated GL.

SFA removed the unallowable expenses from the nonprofit food service account and sent updated General Ledger. Corrective Action accepted. No further action needed.

767. Nonprogram Revenue and Food Cost Ratio

Finding 9000: USDA Nonprogram Revenue

SFA did not complete the USDA Nonprogram Revenue (NPR)

Corrective Action:

Complete the NPR

SA received the completed NPR. Corrective Action accepted. No further action needed.

General Program Compliance - Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

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

Finding 9000: Other Finding

The Civil Rights Ethnic data report was not completed in its entirety. Question #6 was unanswered on the Civil Rights Ethnic data report. Be sure to complete the form in its entirety. Indicate n/a or add comments for questions that are not applicable to the SFA.

The Civil Rights Ethnic data report was completed on 6/18/19, which is in SY 18-19. Therefore, a report has not been completed for the current school year. The Civil Rights Ethnic data report must be completed for each school year by October 31.

Corrective Action:

1. The Civil Rights Ethnic data report must be completed in its entirety for each school year by October 31.
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 action will be implemented.

SNP Administrative Review Findings**Ke Kula Ni'ihau O Kekaha Learning Center PCS
(4407-5)****Program Year 2020****810. Non-discrimination on appropriate Program materials?****Finding 9000: Other Finding**

The SFA is using the incorrect non-discrimination statement on the posted monthly menu.

Corrective Action:

1. Use the most current nondiscrimination statement on all program materials. The current nondiscrimination statement is available at: <https://hcnp.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 on the document.
2. Maintain documentation to demonstrate 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.

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1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?**Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.**

The SFA was in the process of updating its Local Wellness Policy during the Administrative Review process. SFAs must conduct an assessment of the wellness policy every 3 years, at a minimum. This assessment will determine: compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. The SFA must make the results of the most recent assessment of the Local School Wellness Policy available to the public upon approval.

Corrective Action:

1. Complete the assessment of the wellness policy and make the assessment available to the public.
2. Keep documentation on file to demonstrate 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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Technical Assistance

HCNP provided a link to a model Local Wellness Policy from the Alliance for a Healthier Generation for Ke Kula Ni'ihau to emulate.

1400. Food safety plan – contain required elements, copy available at each school?**Finding 9143: A copy of the written food safety plan is not available at each school.**

The SFA does not have a food safety plan.

Corrective Action:

1. Review Food Safety Program resources on the HCNP website at the following link: <https://hcnp.hawaii.gov/overview/nsfp/>.
2. Create a site-specific Food Safety Plan and maintain a copy at all sites accessible to all nutrition staff members.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.



Program Year 2020

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1602. On-site observation validate Off-Site Assessment Tool responses to SFSP & SBP Outreach questions?

Finding 9009: SFSP & SBP Outreach information on the Off-site Assessment Tool not validated, or deficiencies found.

Upon review of the School Breakfast Program, it was found that the SFA is not informing families of the availability of the School Breakfast Program prior to, or at the beginning of the school year.

Upon review of the SFSP, it was found that the SFA is not informing eligible families regarding the availability and location of free meals for students via the Summer Food Service Program.

Corrective Action:

1. Create a standard operating procedure (SOP) on how the SFA will ensure households are notified about the availability of the School Breakfast Program prior to, or at the beginning of the school year.
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. 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.
5. Train all appropriate staff on the SOP.
6. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
7. 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:

Summer outreach is required to inform families of meal availability during the summer time; breakfast outreach is required to be conducted once at the start of the year, and should send reminders regarding the availability of SBP multiple times throughout the school year.

Each year, HCNP provides a public release template that is available on HCNP's website for SFAs to use and complete.

IX Special Provision Options - Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

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

Finding 9000: Other Finding

Ke Kula Ni'ihau has not provided reviewers with supporting documentation (enrollment and DC lists). Ke Kula Ni'ihau began claiming meals served to pre-k students in SY 2019-20. Per federal regulations, SY2019-20 must then become the new base year.

After reviewing records received from the base year (SY 2017-2018), numbers were found to be less than reported. The reported numbers were 51 enrolled students and 33 total identified students – this equates to 64.71% free, which multiplied by the 1.6 factor, allowed Ke Kula Ni'ihau to claim 100% of meals at the free rate. However, reviewers were only able to confirm 31 identified students with 52 enrolled students. This equates to 59.62%, which multiplied by the 1.6 factor, allows Ke Kula Niihau to claim 95.39% of meals at the free rate. These numbers would then apply for SY 2017-18 and SY 2018-19.



Program Year 2020

Since the incorrect ISP of 64.71% with a free claiming percentage of 100% was used for SY 2017-18, 2018-19, and 2019-20, fiscal action will be taken for all months the incorrect ISP was used.

Corrective Action:

1. Per USDA Western Region's guidance, HCNP will validate Identified Student Percentages at the time of CEP election by an SFA or school. HCNP validated the Ke Kula Ni'ihau O Kekaha Learning Center — Public Charter School's ISP for SY 24-25 at the time of application.
2. Each year, appropriate SFA staff will complete HCNP's CEP training prior to completing the CEP Data Collection Form.
3. Complete the CEP Data Collection Form accurately on an annual basis.
4. Maintain all documentation that supports the data entered on the CEP Data Collection Form.
5. Meet all HCNP deadlines for completing the CEP training and the submission of the CEP Data Collection Form and all supporting documentation, upon request.
6. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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SNP Administrative Review Findings

Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

Program Year 2020

Ke Kula Ni'ihau O Kekaha Learning Center (556-PCS)

8135 Kekaha Rd
Kekaha, HI 96752

Month of Review: January 2020

Meal Observation: February 6-7, 2020

Technical Assistance

* Meal Components & Quantities Question: 403.: Milk Varieties

The SFA did not have at least two milk choices available on the serving line before breakfast and lunch meal services. The SFA corrected the meal service line so that two types of milk were available at breakfast and lunch meal services. No further technical assistance or corrective action is required.

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

The most recent food safety inspection was not posted. The most recent food safety inspection must be posted in a visible location. The SFA replaced the posted inspection with the most recent food safety inspection while the reviewer was onsite. No further corrective action required.

* Meal Components & Quantities Question: 502.: OVS Meal Signage

The posted meal signage does not adequately explain OVS. Reviewers provided TA (signage template-OVS) and additional technical assistance to ensure that the proper nondiscrimination statement is included.

* Meal Components & Quantities Question: 404.: Meal Signage

The daily menu does not display the current menu. The Sponsor must ensure that the menu is updated daily at each meal service to display the correct items being served.

- a. SFA did not have signage posted for the breakfast served on 2/7/20 (muffin). The signage still listed the lunch for 2/6/20.
- b. SFA did not have signage posted for the lunch served on 2/6/20 (chicken nuggets). The signage listed a different meal - chili. Reviewer informed the food service staff and the signage was changed in time for the meal service for grades 6-12. Signage was not updated to display the breakfast menu on 2/7/20 (it still showed the lunch menu from the prior day).

* Meal Components & Quantities Question: 402.: Minimum Milk Quantities

Staff was not providing a $\frac{3}{4}$ cup serving of milk to Pre-K students during meal service. The reviewer pointed this out, and the sponsor corrected it during meal service. Additional guidance was provided The Pre-K meal pattern does not allow chocolate milk. Daily milk requirements are a minimum of 6 oz for the Pre-K age/grade group and a minimum of 8 oz for K-12 age/grade groups

* Meal Components & Quantities Question: 400.: Completing Production Records

The reviewer provided technical assistance in correctly completing production records, including age/grade groups served, serving sizes, and component crediting. The Sponsor was also advised not to use whiteout on any documentation correction. The Sponsor should draw a thin line through the incorrect information and initial next to the error.

* Meal Components & Quantities Question: 401.: Pre-K Required Milk

One Pre-K student was not served milk. The reviewer informed the food service staff that milk was required, and milk was served to the student.

* Meal Components & Quantities: FFAVORS

Usage of produce items ordered through FFAVORS must be used in meal service (i.e. breakfast or lunch). The produced cannot be used for snacks. Maintain separation of produce ordered through FFAVORS from all other produce.



SNP Administrative Review Findings

Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

Program Year 2020

* Meal Components & Quantities: Grain-based Desserts

HCNP reviewed the grain-based dessert regulation with the SFA. Grain-based desserts are not allowable for the Pre-K age/grade group. Grain-based desserts may not exceed 2 oz eq per week for the K-12 age/grade group.

Meal Counting & Claiming - Ke Kula Ni'ihau O Kekaha Learning Center (556-PCS)

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

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

As observed on the Day of Review, each type of meal service line does not provide an accurate count by eligibility category at the point of service. Breakfast meals were not counted at the point of service for age/grade group K-12. The Pre-K lunch meals were counted before the participants received the milk component.

Corrective Action:

1. Provide training to appropriate staff on proper meal counting and claiming procedures. Meal counting must be done only at the point of service, when the child has received a reimbursable meal.
2. Maintain training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with the appropriate staff.
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.

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

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The sum of the school's daily meal counts by category for the review period does not match the State agency's validated meal counts for the school for the review period. The SFA's claim for the school for the Review Period does not match the State agency's validated meal counts by category for the school for the Review Period.

The SFA did not correctly count the total lunches claimed during the review period, resulting in an overclaim of two lunches. The SFA overclaimed two breakfast meals on 1/17/20 and underclaimed two breakfast meals on 1/10/20. The total number of breakfast meals claimed was correct. The finding will result in fiscal action for the two (2) lunches that were overclaimed.

Corrective Action:

The difference between the SFA Count and the State agency validated count, by category, is documented on S-1.

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, 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.
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 in accordance with recordkeeping requirements.
5. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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Program Year 2020

Meal Components & Quantities - Ke Kula Ni'ihau O Kekaha Learning Center (556-PCS)

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

Finding 9000: Other Finding

During the meal observation, the reviewer could not validate the quantities for the meat/meat alternate, vegetables, or grains components served during lunch. Therefore, it could not be determined if the Sponsor met the minimum daily requirements for the meat/meat alternate, vegetable, and grain components during the lunch meal service.

Corrective Action:

1. Make all of the appropriate corrections to the production records, templates, grain calculator forms, and recipes. Ensure the meal pattern requirements are met after making the corrections. Maintain the corrected documentation to demonstrate that the changes were corrected.
2. Maintain legible product labels, ingredient lists, and nutrition fact labels for all products served. This includes any Child Nutrition Labels and Product Formulation Statements.
3. Create a Standard Operating Procedure (SOP) to ensure that documentation to support the meals prepared and served is maintained.
3. Train all relevant staff on the contents and implementation of the new SOP.
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.

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

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

Finding 9052: Day of Review portion sizes insufficient.

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Insufficient portion sizes observed during breakfast on the Day of Review: K-8 was only offered 1/2 cup of fruit during breakfast. This does not meet the daily minimum requirement of 1 cup of fruit during breakfast.

Corrective Action:

1. Update menus to come into compliance with the USDA SBP 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 action will be implemented.

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

Finding 9000: Other Finding

For SY 2019-2020, at least half (50%) of the grains offered weekly needed to be whole grain-rich, and the other remaining grains offered needed to be enriched. For the week of review, 36.36% of the grains offered were whole grain-rich for grades 9-12 & 6-8, and 41.67% of the grains offered were whole grain-rich for grades K-5.

SNP Administrative Review Findings**Ke Kula Ni'ihau O Kekaha Learning Center PCS
(4407-5)*****Program Year 2020***

The following products were not whole grain-rich. Increase the amount of whole grain-rich products offered to ensure that the menu provides the minimum weekly required amounts of whole grain-rich items.

- Hamburger bun
- Spaghetti – the label was not provided, therefore, reviewers were unable to determine if this product was whole grain-rich.

Please note that for SY 2025-2026, the requirement is that at least 80% of grains offered weekly must be whole grain-rich, and the remaining grain items offered must be enriched.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete 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**

During SY 2019-2020 at least half (50%) of the grains offered weekly needed to be whole-grain rich, and the other remaining grain items offered needed to be enriched. Please note that the current (SY25-26) regulation is that at least 80% of grains offered must be whole grain rich, and the remaining grain items offered must be enriched.

Due to insufficient documentation (product labels, standardized recipes, CN labels, PFS, etc.), the total whole grain-rich menu items could not be verified.

Corrective Action:

1. Create a Standard Operating Procedure (SOP) to ensure that documentation to support the meals prepared and served is maintained, including whole grain-rich menu items. This includes maintaining product formulation statements (PFS), child nutrition (CN) labels, nutrition facts labels, and standardized recipes.
2. Train all relevant staff on the contents and implementation of the new SOP.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
5. 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 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**

Subgroups of vegetables must be met for each grade group. Lettuce was the only potential dark green vegetable indicated, but the food production record did not indicate what type of lettuce was served. Therefore, the ½ cup weekly dark green vegetable subgroup requirement could not be validated for grades 9-12 and 6-8.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement



Program Year 2020

area.

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

Finding 9000: Other Finding

Subgroups of vegetables must be met for each grade group. The 1 ¼ cup weekly red/orange vegetable subgroup requirement for grades 9-12, and the ¾ cup weekly red/orange subgroup requirement for grades K-8 was not met. There were no creditable red/orange vegetables served during the week for grades K-8 and 9-12.

Carrots and tomatoes appeared to be served this week as listed on the production records, however, the portions were always too small to credit. Remember that the minimum amount of vegetables that can be credited towards the meal pattern is 1/8 cup.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete 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 with technical assistance during the on-site visit.

Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus.

- Production records with planned numbers for each item should be accessible before each meal service. Served numbers and leftover numbers need to be recorded at the end of meal service to ensure accuracy.
- Secure manufacturer labels for all menu items served. Manufacturer labels may be located on the product packaging or on the manufacturer's website.

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.

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

- All ingredients in the recipe.
- 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.

Recipes were not provided for the review for any menu items.

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

Finding 9000: Other Finding

The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met daily, with only 1/2 cup(s) offered.



Program Year 2020

The federal regulations require minimum weekly amounts for fruit. The weekly minimum requirement of 5 cups was not met for grades 9-12, with only 2 ½ cups offered for the week.

The federal regulations require a minimum of ½ cup of fruit to be offered each day for grades K-5. This requirement was not met daily, with only ¼ cup offered. One third cup fruit was recorded on the production records daily, which rounds down to ¼ cup fruit.

The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 2 ½ cups was not met for grades K-5, with only 1 ¼ cups offered.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete 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 federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12. This requirement was not met on Monday, January 13, and Tuesday, January 14, with only ¾ cup offered each day, as well as Wednesday, January 15, and Friday, January 17, with only ¼ cup offered each day.

The federal regulations require a minimum of ¾ cup of vegetable to be offered each day for grades 6-8. This requirement was not met on Wednesday, January 15, with only 1/4 cup offered, and Friday, January 17, with only 1/4 cup offered.

The federal regulations require a minimum of ¾ cup of vegetable to be offered each day for grades K-5, and ¼ cup of vegetable for Pre-K. This requirement was not met on Monday, January 13, with only 3/8 cup offered, Tuesday, January 14, with only 3/8 cup offered, Wednesday, January 15, with only 1/8 cup offered, Thursday, January 16, with only 5/8 cup offered, and Friday, January 17, with only 1/8 cup offered.

Reviewers suggest increasing the serving size of the lettuce served daily to 1 cup each. Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are credited at half volume. Therefore, a one-cup serving of fresh lettuce or spinach credits as ½ cup vegetable.

The minimum daily vegetable requirement for grades 9-12 is 1 cup. To ensure that offer versus serve (OVS) requirements are being met, reviewers suggest always serving grades 9-12 vegetables in at least ½ cup portions. Offer two daily.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. Complete 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.



Program Year 2020

Finding 9000: Other Finding

The federal regulations require daily minimum amounts of the grain component to be served. The daily minimum of 1 oz. eq. could not be validated on January 16, 2020. On Thursday, January 16, 2020, the food production record for grades PreK-5 & 6-12 indicated that a grain item was served, but did not feature the serving size of the grain.

The federal regulations require weekly minimum amounts of the combined grain and meat/meat alternate component to be served. Due to the SFA not being able to provide labels for the items on the menu, the weekly requirement of 7 oz. eq. could not be validated for grades PreK-5.

The federal regulations require weekly minimum amounts of the combined grain and meat/meat alternate component to be served. Due to the SFA not being able to provide labels for the items on the menu, the weekly requirement of 9 oz. eq. could not be validated for grades 6-12.

A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for all processed menu items. Therefore, meal pattern requirements could not be determined as met. The following items served did not have a Child Nutrition Label:

- o Breakfast Pronto
- o French Toast
- o Portuguese Sausage
- o Ham
- o Breakfast Pocket

Due to the cereal not being recorded on the production records on Thursday, January 16th, the grains from the cereal served could not be credited.

Corrective Action:

1. Secure a Child Nutrition Label for all menu items offered that are pre-made/mixed products. Maintain these labels on file. Verify with the label that each item offers at least 1 oz. eq. of grain per portion served.
2. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
3. Maintain all production records daily with all menu items planned and served.
4. Create a Standard Operating Procedure (SOP) to ensure that documentation to support the meals prepared and served is maintained. This includes maintaining product formulation statements (PFS), child nutrition (CN) labels, nutrition facts labels, and standardized recipes.
5. Train all relevant staff on the contents and implementation of the new SOP.
6. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
7. 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 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 menus to be planned that meet the minimum daily 2-ounce equivalent grain requirement for grades 9-12. Due to the SFA not being able to provide labels, this requirement was not met on Monday, January 13, only 1/2 oz. eq. offered was validated, Tuesday, January 14 with only 1.5 oz. eq. was validated, Wednesday, January 15 and Thursday, January 16 with none of the grains offered being validated.

The federal regulations require menus to be planned that meet the minimum daily 1-ounce equivalent grain requirement for

SNP Administrative Review Findings

Ke Kula Ni'ihau O Kekaha Learning Center PCS
(4407-5)**Program Year 2020**

grades K-5 & 6-8. Due to the SFA not being able to provide labels, reviewers were not able to validate if the minimum daily grain requirement was met on Monday, January 13, (only 1/2 oz. eq. of grain offered could be validated), Wednesday, January 15, and Thursday, January 16, with none of the grains offered being validated.

The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 10 oz. eq. was not met for grades 9-12. The menu offered a minimum of 5.5 oz. eq. of grain throughout the week.

The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 8 oz. eq. was not met for grades 6-8. The menu offered a minimum of 5.5 oz. eq. of grain throughout the week.

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-5. The menu offered a minimum of 3 oz. eq. of grain throughout the week.

On Monday, January 13, only one taco shell (14g) was served. According to the Food Buying Guide, 28 g of taco shells are needed to provide 1 oz. eq of grain. In order to provide 1 oz eq of grain, 2 taco shells would need to be served. Reviewers suggest adding an additional 1/2 cup of rice or a 1 oz. (28 g) whole grain breadstick served to grades 9-12 to meet the other 1 oz. eq. requirement for the day.

For grades 9-12 on Tuesday, January 14, the hamburger bun served was only 43 g. or 1.5 oz. eq. Replace this bun with a larger bun that is at least 56 g or 2 oz. eq for grades 9-12.

• A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for all processed menu items. Therefore, meal pattern requirements could not be determined as met. The following items served did not have a Child Nutrition Label:

- o Pizza
- o Chicken Nuggets

Ensure that all grain items served to grades 9-12 provide at least 2 oz. eq. grains per serving.

Corrective Action:

1. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
2. 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 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 menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. Due to the SFA not being able to provide labels for the items on the menu, the amount of meat/meat alternate served on Tuesday, January 14, through Friday, January 17, could not be validated.

On Monday, January 13, the production records showed that 10 lbs. of ground beef was prepared for the tacos. After a recipe analysis was conducted for 10 lbs. of ground beef, it was determined that the SFA provided only 1.5 oz. eq. of meat/meat alternate.

Reviewers suggest adding 1/2 oz. shredded cheese to each taco to meet the minimum daily requirement of 2 oz eq meat/meat alternate for grades 9-12 on this day.

SNP Administrative Review Findings**Ke Kula Ni'ihau O Kekaha Learning Center PCS
(4407-5)*****Program Year 2020***

- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for all processed menu items. Therefore, meal pattern requirements could not be determined as met. The following items served did not have a Child Nutrition Label:
 - Hamburger Patty
 - Pizza
 - Chicken Nuggets

A recipe was not provided for Spaghetti; therefore, reviewers were unable to determine the amount of creditable meat/meat alternate offered in the spaghetti.

The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The minimum weekly requirement of 10 oz. eq. was not met for grades 9-12. Due to insufficient documentation (product labels, standardized recipes, CN labels, PFS, etc.), only 1.5 oz. eq. of meat/meat alternate was able to be validated throughout the week.

The federal regulations require menus to be planned that meet the minimum daily 1-ounce equivalent meat/meat alternate requirement for grades PreK-5 & 6-8. Due to insufficient documentation (product labels, standardized recipes, CN labels, PFS, etc.), the daily minimum for Tuesday, January 14, through Friday, January 17, could not be validated.

The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 9 oz. eq. was not met for grades 6-8. Due to insufficient documentation (product labels, standardized recipes, CN labels, PFS, etc.), only 1.5 oz. eq. of meat/meat alternate was able to be validated throughout the week.

The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 8 oz. eq. was not met for grades K-5. Due to insufficient documentation (product labels, standardized recipes, CN labels, PFS, etc.), only 1.5 oz. eq. of meat/meat alternate was able to be validated throughout the week.

Corrective Action:

1. Create a Standard Operating Procedure (SOP) to ensure that documentation to support the meals prepared and served is maintained. This includes maintaining product formulation statements (PFS), child nutrition (CN) labels, nutrition facts labels, and standardized recipes.
2. Train all relevant staff on the contents and implementation of the new SOP.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Update menus to come into compliance with the USDA NSLP meal pattern requirements.
5. 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 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 minimum daily amounts of fruit for breakfast. The daily minimum of 1 cup was not met for grades K-5, with only $\frac{1}{4}$ cup offered. K-5 students require 1 cup at breakfast daily.

The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 5 cups was not met for grades K-5, with only 1 $\frac{1}{4}$ cups offered.

The federal regulations require minimum daily amounts of fruit for breakfast. The daily minimum of 1 cup was not met daily for



SNP Administrative Review Findings

Ke Kula Ni'ihau O Kekaha Learning Center PCS (4407-5)

Program Year 2020

grades 6-12, with only 1/2 cup offered.

The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 5 cups was not met for grades 6-12, with only 2 1/2 cups offered.

Information provided indicated that only 1/3 cup of fruit was offered daily, which rounds down to 1/4 cup. Juice was mentioned on the menu, but was not listed on the production records and could not be credited. No label was submitted for the juice to verify if it was 100% juice.

If additional fruit and/or juice are offered daily, this needs to be documented on the production records.

Corrective Action:

1. Update menus to come into compliance with the USDA School Breakfast Program (SBP) meal pattern requirements.
2. 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 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.

Other Federal Programs - Ke Kula Ni'ihau O Kekaha Learning Center (556-PCS)

1900. FFVP: School on track to spend no more than 10% of grant on administrative costs?

Finding 9000: Other Finding

The Sponsor did not implement the Fresh Fruit and Vegetable Program. As a result, the Sponsor did not spend the money awarded for the Fresh Fruit and Vegetable Program.

Corrective Action:

1. Maintain supporting documentation to support that FFVP-awarded funds are spent on allowable expenses.
2. Maintain documentation that when funds are used, no more than 10% of the total funds are used on administrative costs.
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.

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.