



SNP Administrative Review Findings

Wai'alae Elementary Public Charter School (1429-0)

Program Year 2023

Wai'alae Elementary Public Charter School (1429-0)

1045 19th Ave.
Honolulu, HI 96816-4606

No. of Sites / Reviewed: 1 / 1

Month of Review: April 2023

Date of Review: May 8-12, 2023

Exit Conference: May 12, 2023

Due Date for Corrective Action: **September 2, 2025**

Commendations

* Sponsor: Commendations.

Thank you for submitting the requested documentation and the timely follow-up responses to our questions.

We appreciate your time and effort in providing the live-streamed meal service observations.

The meals looked appealing, especially the fruit and vegetable salad bar. The students seem to enjoy their meals and have a pleasant dining experience.

We commend Wai'alae School's efforts to evaluate and address food waste.

Technical Assistance

* Certification and Benefit Issuance Question: 128.: Eligibility

The electronic system is using the correct conversion factors when processing applications. However, the calculator tape that the SFA attaches to the application indicates that the SFA is converting income to annual when it is not needed. The SFA must validate applications using the income frequency provided and only convert to annual if more than one income frequency is indicated.

* General Program Compliance Question: 1602.: Outreach

Technical assistance was provided for program outreach. School Breakfast Program (SBP) outreach must be conducted, at a minimum, at the beginning of the school year, when free and reduced price meal applications are sent to households. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year. Program outreach should include information about the availability of your breakfast program, such as meal service start and end times, and meal prices.

Summer Food Service Program (SFSP) outreach must be conducted annually, even if the SFA/school does not participate in SFSP. At the end of the school year, HCNP provides SFAs with information about summer feeding and a list of summer meal sites. HCNP provides an Excel spreadsheet at the end of the school year with the location of all schools and community locations participating in the SFSP program that can be used in program outreach.

* General Program Compliance: Civil Rights Complaints

The SFA was reminded that any Civil Rights complaints received by the school must be reported to HCNP within five (5) business days.

Suggestions

* Sponsor: Suggestions.

The SFA may consider applying for the NSLP Equipment Grant to purchase desired kitchen equipment, a new computer for the POS, and a weighing scale to aid in food waste studies.



SNP Administrative Review Findings

Wai'alae Elementary Public Charter School (1429-0)

Program Year 2023

Certification and Benefit Issuance - Wai'alae Elementary Public Charter School (1429-0)

129. Household notification consistent with Off-site Assessment responses?

Finding 9000: Other Finding

The household notification letter does not state the reason for the change in benefits, such as income, when program benefits are decreased, or provide the date the benefits change. The eligibility changes are correct in the system. For example, student ID 2392201104 went from free to reduced, however, the notification letter did not provide that the benefits were effective on 8/8/2022.

Corrective Action:

1. Revise letters sent to households to include why the benefit status changed and the effective date of the new eligibility.
2. Keep documentation demonstrating that the corrections were made to the household notification letters.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Technical Assistance:

The SFA should consider using the Notice to Households of Approval/Denial of Benefits on the HCNP website at <https://hcnf.hawaii.gov/overview/nsfp/>.

130. Household notification of denied benefits consistent with FNS requirements?

Finding 9000: Other Finding

The household notification of denied benefits is not consistent with FNS requirements, as it does not contain:

- The most recent USDA nondiscrimination statement
- The date eligibility changes. The household notification letter to student ID 58511800517 indicated the status is changing from free to paid. However, the date eligibility status change was not provided.
- An email address is not provided for the hearing official.

Corrective Action:

1. Maintain household notification of denied benefit letters to households showing that the notification of denied benefit letters meets USDA eligibility 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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Verification - Wai'alae Elementary Public Charter School (1429-0)

211. Verification notification letter?

Finding 9000: Other Finding

The SFA is not completing the required information on the "We must Check Your Application" household notification letter. The SFA is not entering the contact name and documentation due date in the first sentence of the notification letter. "You must send the information we need, or contact (name) by (date), or your child(ren) will stop getting free or reduced price meals."

Corrective Action:

1. Create a standard operating procedure (SOP) on household notification requirements.



SNP Administrative Review Findings

Wai'alae Elementary Public Charter School (1429-0)

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Program Year 2023

2. Train all appropriate staff who prepare and send household notification letters.
3. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
4. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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General Program Compliance - Wai'alae Elementary Public Charter School (1429-0)

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

Finding 9000: Other Finding

The current nondiscrimination statement is not consistently used. The incorrect nondiscrimination statement is used on some documents submitted for review for the current school year, such as "Civil Rights Policy," "USDA National School Lunch Program Compliance" (Written Complaints for Child Nutrition Civil Rights), and "Parent Notification of Eligibility" letter.

The current nondiscrimination statement is not used on the Local School Wellness Policy.

Corrective Action:

1. Use the most current nondiscrimination statement on all program materials. 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 consists of everything listed in the large box 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.

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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 School Food Authorities (SFAs) are required to maintain a current and USDA-compliant Local Wellness Policy (LWP). The SFA's existing LWP does not reflect the requirements set forth in the Final Rule, which became mandatory as of June 30, 2017. Therefore, the current LWP is out of compliance and must be updated accordingly.

Corrective Action:

1. Update the Local School Wellness Policy to ensure it includes all required USDA elements and complies with current guidelines.
2. Post the updated Local School Wellness Policy on the SFA's website for public access.
3. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

Technical Assistance:

Resources were provided to the SFA to aid with updating its wellness policy to be in program compliance. A sample wellness policy can be found on HCNP's website at <https://hcnf.hawaii.gov/wp-content/uploads/2019/09/AHG-Model-Wellness-Policy->



Program Year 2023

2.docx.

At a minimum, policies are required to include:

- SFA's must establish wellness policy leadership of one or more SFA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy.
- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. SFA's are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with federal regulations for:
 - School meal nutrition standards, and the
 - Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).
- Fundraiser guidelines, including the number of approved fundraiser exemptions per year, per age/grade group.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.
- Permit participation by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process.
- Triennial Assessments:
 - o Compliance with the wellness policy.
 - o How the wellness policy compares to model wellness policies, and
 - o Progress made in attaining the goals of the wellness policy
- Public updates:
 - o The wellness policy, including any updates to and about the wellness policy, on an annual basis, at a minimum, and
 - o The Triennial Assessment, including progress toward meeting the goals of the policy

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

Finding 9000: Other Finding

The SFA did not provide documentation that an assessment of the Local School Wellness Policy has been completed.

Corrective Action:

1. Complete the assessment of the wellness policy and make the assessment available to the public.
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.

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

Technical Assistance:

The local wellness policy must be reviewed and updated on a periodic basis. At a minimum, SFAs must conduct an assessment of the wellness policy every 3 years

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

Finding 9000: Other Finding

The SFA did not provide documentation to show that the appropriate people (parents, students, representatives of the school

SNP Administrative Review Findings**Wai'ala'e Elementary Public Charter School (1429-0)*****Program Year 2023***

food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public) were notified to be involved in the development, implementation, periodic review, and update of the School's Local School Wellness Policy.

The SFA did not provide documentation to show that they reached out to potential stakeholders (parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public) to participate in the development, review, update, and implementation of the school's Local School Wellness Policy.

The wellness committee meeting minutes provided from 6/13/2022 do not identify the position of the attendees in attendance.

Corrective Action:

1. Create a process on how potential stakeholders will be made aware to participate in the development, review, update, and implementation of the Local School Wellness Policy.
2. Make potential stakeholders aware of the ability to be able to participate in the development review, update, and implementation of the Local School Wellness Policy.
3. Keep documentation to show how potential stakeholders were made aware of their ability to participate in the Local Wellness Policy process.
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.

1211. Validate OFS #1201 - SFA employee count**Finding 9000: Other Finding**

The Child Nutrition Director named during the onsite review did not match the Child Nutrition Director's name given on the off-site assessment tool.

Corrective Action:

1. Recategorize all employees under the correct category and ensure the required training hours have been or will be completed.
2. Maintain documentation that all employees were correctly categorized and the required training hours were met.
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.

1213. Validate OFS #1203 - Did new Director meet food safety certification and training requirements?**Finding 9000: Other Finding**

The SFA did not provide training documentation that the Child Nutrition Director completed an accredited 8-hour Food Safety Managers course. A food handler's certificate was provided as food safety training.

Corrective Action:

1. The School Nutrition Program Director must complete required 8 hours of food safety training. The food safety training must be completed either not more than 5 years prior to their starting date or completed within 30 days of the employee's starting date.
2. Keep training documentation (certificate) to confirm that training was completed. Documentation must be kept for 3 years



Program Year 2023

plus the current school year, or 6 years plus the current year, if required to follow the Hawaii State Department of Education requirement.

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.

1219. Validate OFS #1209 - Employees outside of the School Nutrition Program with School Nutrition Program duties receive training?

Finding 9000: Other Finding

Documentation was not provided to determine that the employees outside of the School Nutrition Program, whose responsibilities include duties related to the operation of the School Nutrition Program, received applicable training.

Corrective Action:

1. Each year, the School Nutrition Program Personnel will receive the required training related to their job duties.
2. Create a standard operating procedure (SOP) detailing how all school nutrition employees at the SFA level and at the school level have met the required professional standards hours training requirement annually. Include in the procedures how the SFA will have all required information readily available for review upon request by the State Agency.
3. Train all appropriate staff on the SOP.
4. Keep training documentation (sign-in sheet, date of training, agenda) to confirm that training was completed with appropriate staff.
5. Documentation of professional standards training should be kept for 3 years plus the current school year. Records that list the employee name, employer/school, hiring date, Professional Standards job category, training title, topic/objectives, training source, dates, and total training hours would be appropriate to show compliance with professional standards training requirements.
6. Complete and submit the Attestation Report by selecting the checkbox next to each identified finding and corresponding requirement area.

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

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, description of the school site, Process 1 and 2 control measures for commonly used menu items, record-keeping procedures, and periodic program review.

Corrective Action:

1. Review the Food Safety Plan to align fully with all USDA requirements.
2. Revise and update the Food Safety Plan to include all the required elements, including adding Standard Operating Procedures. The SFA may use the templates located on the HCNP website to create site-specific SOPs.
3. Train staff on all Standard Operating Procedures (SOPs).
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

SNP Administrative Review Findings**Wai'alaie Elementary Public Charter School (1429-0)*****Program Year 2023***

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

Technical Assistance:

A sample food safety plan can be found on the HCNP website at <https://hcnp.hawaii.gov/overview/nsfp/>.

The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5).

- (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must:
 - (i) Perform a hazard analysis;
 - (ii) Decide on critical control points;
 - (iii) Determine the critical limits;
 - (iv) Establish procedures to monitor critical control points;
 - (v) Establish corrective actions;
 - (vi) Establish verification procedures; and
 - (vii) Establish a recordkeeping system.
- (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes:
 - (i) Standard operating procedures to provide a food safety foundation;
 - (ii) Menu items grouped according to process categories;
 - (iii) Critical control points and critical limits;
 - (iv) Monitoring procedures;
 - (v) Corrective action procedures;
 - (vi) Recordkeeping procedures; and
 - (vii) Periodic program review and revision.



SNP Administrative Review Findings

Wai'alaie Elementary Public Charter School (1429-0)

Program Year 2023

Wai'alaie Elementary Public Charter School (149-PCS)

1045 19th Ave.
Honolulu, HI 96816-4606

Month of Review: April 2023

Date of Onsite Review: May 8-12, 2023

Meal Observation: May 9, 2023

Technical Assistance

* General Program Compliance Question: 901.: On-site Monitoring

The SFA is a single-site SFA and not required to complete the on-site monitoring (MC-7 form); however, it is highly recommended, and we commend the SFA for completing the on-site monitoring form for this school year. Technical assistance was provided in answering questions not completed on the MC-7 form. Also, please remember to review the results of on-site monitoring with the staff involved in meal counting and claiming.

* Meal Components & Quantities Question: 410.: Meal Pattern

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

Offer Versus Serve (OVS) is not permitted in the Child and Adult Care Food Program (CACFP) outside of adult meals. Production records for lunch indicate that OVS was utilized for Pre-K to 5th grade. The sponsor needs to verify if the documentation of OVS being used for Pre-K is accurate, since Pre-K is not comingled with any other age/grade group during lunch.

A "Fruit" Salad Bar was served daily at breakfast for Pre-K to 5th grade. The production records for Pre-K breakfast show a fruit serving size from the daily "fruit" salad bar as $\frac{1}{2}$ cup. However, when reviewing the multi-day production records for the daily breakfast "fruit" bar options, a $\frac{1}{4}$ cup serving size is noted. Clarification is needed because a $\frac{1}{2}$ cup is the required fruit component serving size at breakfast for children aged 3-5 years.

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 satisfied.

- The Child Nutrition (CN) Label submitted for the following products showed an issue date of greater than 5 years old. The CN numbers were verified as active on the USDA CN Label Verification Report.

- o Turkey slices

- o Portuguese sausage

- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not submitted for all processed menu items. This documentation was secured for the menu items listed below, in order to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.

- o Bosco stick. A spec sheet was submitted, but the PFS was secured to verify crediting.

Meal Components & Quantities - Wai'alaie Elementary Public Charter School (149-PCS)

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met? Enter data.

Finding 9000: Other Finding

The menu documentation is not accurate for the meal produced and served on April 11 and 12, 2023.

For lunch on Tuesday, 4/11/2023, crediting for the grain in the WG Pollock fish sticks is incorrect for grades K-5. The grains should be credited as 1.25 oz eq grains (not 1.0 oz eq).

Reviewers were unable to verify the crediting for the alfredo pasta that was served on Wednesday, 4/12/2023. This is because the recipe yields two different portion sizes, and the recipe is not clear on how many portions are yielded for the Pre-



Program Year 2023

K age/grade group.

The tea roll is missing from the production record for lunch on Wednesday, 4/12/2023. Documentation was provided for this item, and it is indicated on the menu planning template that was submitted by the FSMC.

Corrective Action:

1. Update menus to come into compliance with the 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.

Technical Assistance:

SFAs must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and quantities for each age/grade group. Schools must maintain complete production and menu records, including child nutrition labels, product formulation statements, and recipes in accordance with FNS guidance.

Failure to complete corrective action or request an extension by the due date may result in claim payment being withheld until corrective action is completed and approved.