

	MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES CHILD AND ADULT CARE FOOD PROGRAM	ISSUED	REVISED	CHAPTER	SECTION
	AT-RISK AFTER SCHOOL PROGRAMS POLICY & PROCEDURE MANUAL	7/1/03	3/14	6	6.2
CHAPTER Chapter 6. Requirements of Management – SO’s		SUBJECT Sponsoring Organizations – Required Recordkeeping			

Sponsoring organizations are required to maintain records to support the monthly claim for reimbursement and compliance to Program regulations. All CACFP records must be stored at a central location identified in the sponsoring organization management plan and be available for audit within one hour of the BCFNA reviewer’s arrival. All records (original documents) shall be retained for a period of three years after the date of submission of the final claim for the fiscal year to which they pertain. If audit findings have not been resolved, the records shall be retained beyond the end of the three year period as long as may be required for the resolution of the issues raised by the audit.

The sponsoring organization shall retain the following original record documents in a **central location** identified in the Management Plan:

All required records must be maintained on location during (licensed) hours of business and available for review within one hour of arrival by federal and state officials. Failure to make any/or all records available within one hour of arrival to MDHSS-BCFNA representative may result in review findings, corrective action and/or overclaims.

At-risk after school programs shall maintain the following records (original documentation) relating to participation in the CACFP:

- **Menus.** Menus must be dated and indicate all components that were served. Menus (original documentation) must be maintained for each meal claimed for reimbursement.
- **Daily attendance records.** Sign-in sheets or attendance roster which results in accurate recording of daily attendance is required. Documentation of attendance cannot be used as a basis for completing the meal count record; however, the attendance records should support the meal count records. For example, if John Doe was claimed for a meal on October 17, the attendance records should indicate that John Doe was present at the center on October 17.
- **Daily meal count (tally) records.** The meal count records must indicate the number of meals served by type. Program personnel must physically record (manually with pen and paper) each meal at the time the meal is served. Point-of-service (POS) meal counts (also called tally or strike sheets) are required and must accurately reflect participants who take a complete snack and/or meal. Record the number of adult performing food service labor who are served a meal or snack; however, adults (19 and older) may not be claimed.
- **Claiming Meals.** At-risk after school care centers must report the total number of meals and snacks served to eligible children based on daily attendance rosters or sign-in sheets. A maximum of one snack and one supper may be claimed per participant per meal on a daily basis for children through age 18 (19 if the child is enrolled in school and turns 19 during the school year and other participants with disabilities at any age [7CFR 226.2 Definitions]. With MDHSS approval, it is also permitted to

serve two snacks instead of one meal and one snack. Federal law has no minimum age for at-risk program participants; however, children must be in attendance at preschool or school. Children are not charged for meals or snacks – all are claimed at the “free” meal rate of reimbursement. Meals and snacks are served after school (or preschool) hours; however, with MDHSS-BCFNA approval, meals may be served on weekends, holidays and vacation days during the school year.

- **Program Activities Documentation** – each site must have documentation of organized, regularly scheduled enrichment or educational activities (structured and supervised).
- **Delivered Meals.** Daily record of the number of at-risk snacks and/or meals prepared or delivered (if vended) for each meal service.
- **Documentation of Monitoring*.** Each center under the sponsoring organization’s jurisdiction must be monitored by the Sponsoring Organization (SO) for Program compliance
 - i. Documentation of **pre-approval** visit and training verification must be conducted prior to the beginning of Program operations.
 - ii. **New centers** (after pre-approval is conducted) must be reviewed within the first four (4) weeks of program operations. Centers that had a lapse in participation or a change of sponsorship must be reviewed as a new center. New center documentation can serve as one of the three monitoring required each year.
 - iii. Each center must be monitored at least **three times annually** and each review must be documented.
 - a) At least two of the monitoring visits must be unannounced and
 - b) At least two visits must include observation of a complete meal service.
 - c) No more than 6 months shall elapse between monitoring reviews.

Documentation must include the date, problems noted and corrective action prescribed. The SO must review: the meal pattern; meal count records; menu (must be dated), sanitation inspections and training records. The SO can use CACFP-404 *Sponsored Centers Site Visit Report* or a sponsor developed form to include the required monitoring review requirements.

- ***Monitoring Requirements for Year Round Program Operation Sponsors** - Sponsors that operate CACFP at-risk and transition to the Summer Food Service Program (SFSP) are not required to monitor their sites following the CACFP requirements (above) and then monitor those same sites again following the CACFP requirements during the school year. Instead, such sponsors may follow the CACFP monitoring schedule year-round. If sponsors choose to follow the CACFP monitoring schedule year-round, one of the three annual reviews must occur during the summer, review for SFSP requirements, include the review of a meal service, and be unannounced; two reviews must occur during the school year, review for CACFP requirements, at least one must include the review of a meal service, and at least one must be unannounced.
- **Non-profit food service verification.** The center must have documentation to verify that all of the CACFP reimbursement is being used solely for the conduct of the food service operation; and to improve food service operations.

Non-profit food service verification includes:

- a) **Documentation of income (revenue) to the program.** Income to the program includes all monies received from State, Federal, or local government sources, any center funds used to subsidize the food service program, any payments for adult meals, and any other income including loans and donations to the food program.
 - b) **Documentation of food service expenditures.** Food service expenditures include food and milk purchase receipts or invoices, non-food food service expenses (ex. napkins, single service items and cleaning products), labor cost supported by payroll stubs and time studies, cost of expendable food service equipment, cost of maintaining non-expendable food service equipment, and indirect costs. **Expendable equipment** has a durability of less than two years and costs \$500 or less. **Non-expendable equipment** has a durability of two years or more and costs more than \$500. Examples of indirect costs are rent, utilities, office supplies, etc. A portion of indirect costs can be charged to the CACFP if there is documentation available to support the charge.
- **For-Profit Title XX documentation.** Title XX documentation must be available for for-profit centers. Title XX includes the Title XX billing invoices and a copy of the contract with the Title. For each month claimed, the center must have verification that at least 25% of the enrolled participants were Title XX beneficiaries. Eligibility may be based on Title XX enrollment.
 - **Civil Rights racial/ethnic information.** All centers must:
 - i. Display the “And Justice For All” poster in a location visible to the public;
 - ii. Display the “Federal Relay Service” poster next to the “And Justice for All” (AJA) poster, if the AJA does not include the Federal relay information;
 - iii. Provide the nondiscrimination statement and procedure for filing a complaint in all center brochures;
 - iv. Collect actual beneficiary data by racial/ethnic category annually; and
 - v. Provide CACFP informational materials in the appropriate translation.
 - vi. Provide annual training to front line staff on civil rights.
 - **Documentation of training to staff.** Staff must be trained at least annually and documentation maintained on the CACFP and Civil Rights required training. Documentation must include:
 - i. Session dates;
 - ii. Locations;
 - iii. Required Topics: civil rights, meal pattern and recordkeeping requirements, meal count procedures, claim submission and reimbursement system, appropriate to the level of staff experience and duties
 - iv. Names of participants.
 - **Food Production Records** required for centers using a caterer or contract food service management company. See Section 7 for additional information.
 - **Miscellaneous documentation.** The following miscellaneous documentation must be retained:
 - i. License or license exempt documentation issued by the Section for Child Care Regulation;
 - ii. If center is unlicensed, programs must have documentation of State or local health and safety standards compliance.
 - iii. Documents submitted to the Missouri Department of Health and Senior Services – Bureau of Community Food and Nutrition Assistance (MDHSS-BCFNA);
 - iv. Copy of the Program contract; and

- v. Copies of all correspondence from MDHSS-BCFNA and to MDHSS-BCFNA.

References:

7CFR 226.17a(p)

7CFR 226.2

CACFP Policy Memos:

CACFP 597

CACFP 02-2011

CACFP 02-2011

CACFP 01-2011

CACFP 08-2012, February 17, 2012

CACFP 12-2013, SFSP 14-2013