

	MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES CHILD AND ADULT CARE FOOD PROGRAM		ISSUED	REVISED	CHAPTER	SECTION
	CHILD CARE CENTERS POLICY & PROCEDURE MANUAL		3/91	1/16	6	6.3
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 to comply with program regulations. All CACFP records must be stored at a central location identified in the sponsoring organization management plan and available for audit within one hour of the CFNA reviewer’s arrival. All records 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 records in a **central location** identified in the management plan:

- **Copies of all menus.** Menus must be dated and indicate all components that were served. Each facility must verify the menu served to the children meets the minimum food pattern requirement. Food purchase receipts and invoices will be reviewed to ensure adequate food and milk purchases are made.
- Infant menus and forms. Copies of all infant menus must be maintained as follows:

For infants 0 through 3 months old, a separate *individual infant meal record 0 through 3 months* is required for each infant. The amount served is required as well as an indication of the meal that is being claimed (breakfast, a.m. snack, lunch, p.m. snack, supper, or evening snack). The time served and the amount consumed is recorded on the form.

For infants 4 through 7 months old, a separate *individual infant meal record 4 through 7 months* is required for each infant. Also required is the food item served, i.e. circle the food item such as infant rice cereal, fruits, vegetables, and an indication of the meal that is claimed (breakfast, a.m. snack, lunch, p.m. snack, supper, or evening snack).

For infants 8 through 11 months old, a separate *individual infant meal record 8 through 11 months* is required. The amount and name of the food used to feed the infants must be recorded on the individual infant meal record. Be sure to include all of the food items consumed by the infant and indicate which meals are served and claimed.

Copies of the Infant and Toddler Feeding and Care Plan form. This form must be completed by the parent or guardian for each infant in care. The form must be updated by the parent as the infant is developmentally ready for solid foods. See policy 6.18

Enrollment documents for each child claimed. Enrollment documentation for each child in care must be kept on file. . The enrollment form must be signed and dated by the parent/legal guardian and updated annually. The enrollment form must include the child’s normal days and hours

of care, , and meals normally received. . Centers may use the combined SCCR/CACFP Child Care Enrollment Form. With CFNA approval, a center may use another enrollment form as long as all required information is captured.

- **Daily attendance records. Daily attendance records must be maintained. Attendance must be recorded separately from meal count sheets; although, they may be recorded on the same form.** The attendance records cannot be used as a basis for completing the meal count record. , 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 on October 17.
- **Meal count records.** Each monthly claim for reimbursement must be supported by meal count records for each meal served during the month. The meal count record must indicate the daily number of meals served to children by type of meal (breakfast, lunch, supper, or snack). Each facility's personnel must maintain a point of service meal count, which means that each meal is recorded on the meal count record as the meal is served to each child, or within a very short period of time thereafter. Meals that are not recorded on the meal count records within the time-frame of the meal service may not be claimed for reimbursement. A total head count or head count by category is not sufficient.

Meal count records may also record the eligibility category (free, reduced, or paid) of the child. Care should be taken to assure there is no overt discrimination in the classification and identification of children eligible for free or reduced priced meals. Facilities that record eligibility classifications on the meal count records should use a confidential code (such as X,Y,Z) to distinguish between the free, reduced and paid.

- **Non-profit food service verification.** The sponsoring organization 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:

- Documentation of income 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.
- Documentation of food service expenditures. Food service expenditures include food purchase receipts or invoices (original, itemized receipts/invoices), 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.

See Section 8.2 for more information on records to support program costs.

- **Income Eligibility Forms.** An Income Eligibility Form (IEF) must be on file for each child claimed as free or reduced. IEFs must be updated annually. The IEF is effective on the first day of the month during the month the form is initially signed by the center representative, and expires one year later on the date the center representative signed the form. See Chapter 10 for more information on free and reduced price meals.
- **Foster Child(ren) documentation:** A child in foster care is categorically eligible for free meals. Foster children receive free CACFP meals based on third party documentation of their foster care status. Acceptable documentation must indicate the state retains legal custody of the child. This documentation may come from the court that placed the child or the local foster agency that administers the foster care program.
- **Title XX documentation.** Title XX documentation must be available for for-profit facilities. Title XX documentation includes the Department of Social Services – Family Support Division (FSD) vendor invoices and a copy of the contract with FSD for vendor children. For each month claimed, the sponsor must have verification that at least 25% of the enrolled children or licensed capacity (whichever is less) were Title XX beneficiaries. Title XX documentation does not automatically classify them as free or reduced. The sponsoring organization must monitor this monthly prior to submitting a claim for reimbursement for the facility.
- **Free/Reduced documentation:** For profit child care facilities that are eligible for the CACFP based on free/reduced enrollment must have documentation available to verify that at least 25% of enrolled children or license capacity (whichever is less) are eligible for free or reduced meal reimbursement each month. Documentation must include effective, signed IEFs for the children used to verify eligibility and a current roster of all children enrolled in the facility (if enrollment numbers are less than licensed capacity). The sponsoring organization must monitor free/reduced enrollment monthly prior to submitting a claim for reimbursement for the facility.
- **Civil Rights racial/ethnic date.** The sponsoring organization shall ensure that all centers:
 - display the “And Justice For All” poster;
 - display the “Building for the Future” poster (navy blue);
 - provide the nondiscrimination statement and procedure for filing a complaint in all center brochures;
 - collect actual beneficiary data by racial/ethnic category; and
 - provide informational materials in the appropriate translation regarding the CACFP.
 - Provide Civil Rights training to all CACFP staff.

See Sections 5.7 and 5.8 for more information on Civil Rights.

- **Documentation of training to staff.** Staff must be trained at least annually with regard to the CACFP. Training must include instruction appropriate to the level of staff experience and duties. The required topic include CACFP meal patterns, meal count procedures, recordkeeping requirements, reimbursement system, claim submission and review procedures and adherence to civil rights. Documentation must include:
 - session dates and length (minutes or hours);

- CACFP topic(s) covered
 - trainer's name and position/title
 - training locations;
 - name of attendees signature, a (legible printed name and position title)..
- **Documentation of monitoring.** Facilities under the sponsoring organization's jurisdiction must be monitored for Program compliance at least 3 times annually. At least two of the monitoring visits must be unannounced and at least two must include a complete meal service. Date of the review, problems noted, and corrective action prescribed must be documented. Monitoring review must be no more than 6 months apart. All new facilities must be reviewed within the first four weeks of program operations.
 - **Documentation of the dates and amounts of disbursement to each child care facility.** Disbursements of reimbursement to facilities shall be made within 5 working days from receipt of the check from the Missouri Department of Health and Senior Services – Community Food and Nutrition Assistance (CFNA) to child care facilities under the sponsoring organization's jurisdiction if the facility(ies) is not under the same corporate umbrella or part of the same legal entity as the sponsoring organization.
 - **Miscellaneous documentation.** The following miscellaneous documentation must be retained:
 - child care license;
 - copies of all applications and supporting documents submitted to CFNA;
 - copies of all claims for reimbursement submitted to the CFNA; and
 - copies of all correspondence from CFNA to CFNA.
 - Current sanitation inspection report.
 - Commercially processed food documentation.
 - Medical food substitution forms.

See Chapter 8 for more information on recordkeeping and the booklet entitled Child Care Centers – Recordkeeping Essentials of the CACFP.