

SECTION 11: Recordkeeping

Maintaining accurate records is vital to ensure CACFP reimbursement accurately reflects the center's program operations.

- Meal Service Records
- Participant Records
- Financial Management Records
- Training Records
- Other Required Records
- Organizing Records

Required Recordkeeping

Shelters are required to maintain records to support the monthly claim for reimbursement and comply with program regulations. 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 for as long as may be required for the resolution of the issues raised by the audit. All records must be maintained at the shelter and must be available for audit at all times.

Shelters shall maintain the following records:

Copies of all menus. Menus must be dated and indicate all components served. If the planned menu is changed, the food actually served must be written on the menu. Each facility must verify that the menu served to the participants meets the minimum meal pattern requirements. Food purchases, donation receipts, and invoices will be reviewed to ensure adequate food and milk purchases and donations are made and support the menu.

Resident Rosters. All participants claimed for reimbursement must be residents of the shelter. Shelters must maintain a master listing of residents*, their date of birth*, date they entered the shelter, date they left the shelter, and the signature of the director to verify the information. The resident roster must be updated daily. It is recommended that a new roster be completed each month.

Meals served in a congregate setting (group setting) to participants who reside in a shelter may be claimed for reimbursement. The shelter may serve meals to non-resident children and/or ineligible adults; however, these meals are not reimbursable under the program. The shelter will have to differentiate between participants residing in the shelter and those who may be served meals as "walk-ins."

Children 18 years of age and younger are eligible to participate in the Child and Adult Care Food Program (CACFP). Individuals with disabilities, regardless of age, may also receive meals and snacks at the shelters where they reside.

Meals that are consumed in private family quarters in a shelter are not reimbursable. Only meals served in congregate meal settings are eligible for reimbursement. An exception may be made for infants from birth to 11 months of age served in private family quarters that are part of a shelter. Those meals may be reimbursable if the shelter provides the required meal components to the parents or guardians and maintains records documenting that sufficient food has been provided to meet the minimum meal pattern requirements for infants.

Meal Count Records. Daily meal count records must be maintained for each qualified participant who resides in the shelter. The resident rosters should support the meal count records. For example, if John Doe was claimed for a meal on May 17, the resident rosters should indicate that John Doe was present on May 17 for that meal to be accurately claimed. The meal count record must indicate the daily number of meals served by type of meal (breakfast, lunch, supper, or snack). Shelter 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 participant. An exception to the meals being recorded at the point of service may be made for meals served in private family quarters that are part of an emergency shelter to infants

from birth through 11 months. A maximum of three meals or two meals and one snack may be claimed per participant per day, seven days a week.

Copies of recent fire safety inspection and sanitation inspection. The frequency of inspections may depend on local codes and regulations.

Documentation of training to staff. Staff must be trained at least annually on all mandatory CACFP topics. Volunteers must be trained on Civil Rights at a minimum.

Non-Profit Food Service Verification. The shelter must have documentation to verify that all the CACFP reimbursement is being used solely to conduct or improve the 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 shelter funds used to subsidize the food service program, 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, labor costs supported by payroll stubs and/or 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.

Civil Rights racial/ethnic data. All shelters must:

- > Display the "And Justice For All" poster in a location visible to the public.
- Provide the nondiscrimination statement and procedure for filing a complaint in all shelter brochures that discuss the food program.
- > Collect actual beneficiary data by racial/ethnic category.
- > Display a "Building for the Future" poster in a location visible to the public.
- > Provide informational materials in the appropriate translation regarding the CACFP.

Miscellaneous documentation. The following miscellaneous documentation must be retained:

- Documents submitted to the Department of Health and Senior Services Community Food and Nutrition Assistance (DHSS-CFNA) and
- > The program contract (Scope of Work, Terms and Conditions as part of the contract)

*Per the Stewart B. McKinney Homeless Assistance Act, any victim service provider may not disclose "personally identifying information" or "personal information" about an individual, including a first and last name; a home or other physical address; contact information; a social security number; any other information, including date of birth, racial or ethnic background, or religious affiliation, that, in combination with any other non-personally identifying information, would serve to identify any individual.

Recordkeeping Responsibilities

Maintaining accurate records is vital to making sure Child and Adult Care Food Program (CACFP) reimbursement accurately reflects the shelter's program operations. CACFP forms are available under <u>Forms</u>, and posters are available under <u>Posters, Flyers, & Pamphlets</u> at <u>www.health.mo.gov/cacfp.</u>

CACFP original records, not photocopies, must be maintained on-site for independent facilities, be accessible during licensed business hours, and be available for review within one hour of a state representative's arrival. Sponsoring Organizations (SOs) of two or more facilities must maintain original records during licensed business hours at the location identified in the Management Plan and be available for review within one hour of a state representative's arrival. Community Food and Nutrition Assistance (CFNA) reviewers will request CACFP records for one month or more and have the authority to disallow up to twelve months of claims. Program records must be retained for three full fiscal years, plus the current year (October 1 through September 30), after the final claim for the fiscal year is submitted and for longer if audit findings have not been closed.

Required Records:

Meal Service Records

> Daily Meal Count Records (<u>CACFP-225</u> or <u>CACFP-225A</u>)

Daily meal count records are required and must be recorded at the time of service (Point of Service) for each meal and snack the shelter is approved to claim for reimbursement. Keep current month records on a clipboard or in a binder. File these records with the monthly resident roster. File completed records in a binder or envelope labeled with the month and year.

> Daily Menu Records

Daily dated menus are required for each approved meal to verify CACFP meal pattern compliance. The original menu, noting any substitutions, must be retained. Keep the current active menu on a clipboard or in a folder. When completed, file the menu in the binder or envelope for the month.

Donated Food Log

Record all food donations on the Donated Food Log. File the completed monthly log with the monthly menu records in a binder or envelope labeled with the month and year.

Medical Statement to Request Special Meals and/or Accommodations CACFP-227 Required when food substitutions are necessary and authorized by a medical authority for participants with a diagnosed disability and with medical or special dietary needs. Keep confidential and place in individual participant's file.

> Commercially Processed Food Documentation

If your shelter uses commercially processed foods, documentation of meal pattern contributions is required to include a Child Nutrition label or manufacturer's Product Formulation Statement. File in the binder or envelope for the month.

> Additional Meal Requirements

A shelter must maintain documentation to verify the whole grain-rich requirement is met. This may include the grain product's ingredient label. A shelter must maintain documentation to verify that the cereal and yogurt served are within the required sugar limits. This may include the product's nutrition facts label.

If the shelter provides care for infants, the following forms are required:

Individual Infant Meal Record form (<u>MO 580-3186</u>, <u>MO 580-3188</u>, <u>MO 580-3185</u>, or <u>MO 580-3187</u>).

Keep the active menu on a clipboard or in a folder. File the menu in the binder or envelope for the month.

Participant Records

> Monthly Resident Roster

Shelters must maintain a list of participants by name, date of birth, and dates of residency. Resident rosters must be updated daily to ensure that there is an accurate record of attendance for all participants claimed for reimbursement. Keep the active roster on a clipboard or in a folder. File the roster in the binder or envelope for the month.

Records Pertaining to Financial Management and Administrative Costs

> Operating Costs

Allowable expenses for the preparation and service of meals include but are not limited to, food costs, food service labor, costs for certain non-food supplies, and costs of purchased services.

• Food Costs

Original, intact and legible, itemized food and milk receipts and invoices for food service supply purchases must be kept to verify that CACFP funds are used to support the food service. Handwritten receipts are not acceptable. File in a folder or envelope labeled with month and year.

• Food Service Labor Costs

Independent centers must document.

Documentation of Nonprofit Foodservice CACFP-214

This form must be completed monthly when total food costs are less than the CACFP claim. Place in a folder or envelope labeled with month and year.

Training Records

> Annual CACFP Training Documentation CACFP-222

Documentation of annual CACFP training for the shelter staff and volunteers is required. The use of the CACFP form is not required, but training must include the topics required by the CACFP. File in a folder or notebook.

Other Required Records

- > **Original Contract Agreement**, along with Amendments for the sponsoring agency
- Beneficiary Data Report CACFP-226 Documentation of annual completion of this form is required. File in a folder or notebook.
- Sanitation and Fire Inspection Records File in a folder or notebook.
- Catered or Vended Meals, if applicable Sponsor must maintain:
 - Food service management company contract or agreement.
 - Current state or local health certification.
 - Production Records CACFP-223 required and meal delivery records, if applicable.
 - Evidence that the contractor was obtained using fair and competitive practices.

Sponsoring Organizations (SOs)

Contractors responsible for two or more facilities, either under the sponsor's jurisdiction (affiliated) or under the corporate umbrella (unaffiliated), are required to maintain:

- > **Pre-approval visits** to each new center under an SO.
- Sponsored Centers Site Visit Report CACFP-404 Each SO must monitor every center for program compliance at least three times per year in compliance with regulation.
- Disbursements unaffiliated centers only Documentation of the dates and amount of reimbursement disbursed to each facility within five working days from the CACFP claim processing date is required.

Organizing Records

Suggested items to help you stay organized:

3-ring binders
3 hole punch
Clipboards
Colored highlighters
File folders
File box or cabinet
12 large envelopes, one for each month

Daily Duties - Complete these records daily and maintain them on a clipboard or in a folder. Ensure that all documents are dated. At the end of each month, file the original dated records with monthly records in an envelope or binder.

- > **Resident Rosters** must be updated daily and filed monthly.
- Meal count records must be documented at the point of service. (One exception is that infants served in private family quarters can be documented when the parent reports the meal or snack to staff.)
- Menus verify that each meal served meets Child and Adult Care Food Program (CACFP) meal pattern requirements. If substitutions are made, they must be written in on the menu.
- Food Production Records are required for shelters using a caterer or contract food service management company.
- Delivery Receipts are required for centers using a central kitchen, caterer, or contract food service management company.
- Child Nutrition (CN) Labels and Product Formulation Statements (PFS) are required for purchased commercially processed food.
- > Infant Meal Records are required if the shelter serves infants.

Weekly Duties – Add daily meal counts.

Monthly Duties – retain these legible and intact original, dated records:

- Consolidate financial records: Machine generated dated and itemized food and milk receipts; Child Nutrition (CN) labels and PFS; Donated Food Log, itemized non-food program supplies; and program labor costs; documentation of non-profit food service.
- Prepare and submit the claim for reimbursement: consolidate and determine total attendance; consolidate meal counts and determine the total number of meals served for each meal. For-profit centers must calculate to determine if you are eligible to claim. Submit the claim via CNPweb by the 10th of the month for payment around the 28th or by the 25th for payment around the 13th of the following month.

Yearly Duties – Centers must maintain the original dated records by fiscal year, October 1st through September 30th.

- > CACFP training documentation all required topics must be covered at least once a year.
- Medical Statement to Request Special Meals and/or Accommodations Current sanitation and fire inspections.
- > Beneficiary data report (ethnicity and race), completed annually.
- Site visit monitoring reports for Sponsoring Organizations, 3 per site per year.
- For contracted/catered meals, original contract or agreement and annual renewal with Food Service Management Company.

CACFP Record Retention: 3 fiscal years plus the current year

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Daily dated menus	-
Monthly Resident Rosters, updated daily	
Dated point of service meal count records.	
Infant meal count – count each meal once	Monthly: Place in a binder or envelope
all of the age-appropriate components	labeled with month and year
have been served.	,
Financial records: food service expenses;	
labor and indirect cost records	
summarized on the Documentation of	
Non-Profit Service Form	
Donated Food Logs	
CACFP training documentation	
Requests of Special Meals and/or	
Accommodations	
CN labels or Product Formulation	Yearly: Place in a binder or envelope
Statements	labeled with the year
Beneficiary Data Report	
Vended/catered meal agreements or	
contracts and annual contract renewals, if	
applicable	
Site visit monitoring reports, if applicable	
Sile visit monitoring reports, il applicable	