



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Child and Adult Care Food Program (CACFP) Homes Sponsors

FROM: Cheryl Resha, Education Manager
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: March 25, 2009

SUBJECT: Operational Memorandum #06H-09
Record Maintenance Requirements for Family Day Care Home (FDCH)
Providers in Child and Adult Care Food Program

The purpose of this memo is to reaffirm the intent of the Child and Adult Care Food Program (CACFP) regulations at §§ 226.10(d) and §§ 226.18(d), (e) and (g) that require family day care home providers to maintain program records. Misinterpretation of these requirements and the extent of the associated recordkeeping problems found during various Program evaluation efforts including the United States Department of Agriculture (USDA) Inspector General audits and reviews conducted during the Child Care Assessment Project (CCAP), indicate a need to clarify these established record maintenance requirements. Correct implementation of these provisions is intended to facilitate reviews, enhance Program integrity and assure providers that they are being properly reimbursed by their sponsors.

Through recent audits and reviews, it has come to the attention of USDA that many sponsors collect and maintain most or all provider records. Section 226.10(d) requires that records shall be retained for three years after the date of submission of the final claim for the fiscal year to which they pertain, except that 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. USDA realizes that sponsors must require providers to submit records of menus, meal counts and enrollment. However, it is important that copies of these records also be maintained at the provider's facility in accordance with 226.18(e), which states that each day care home must maintain on file documentation of each child's enrollment and must maintain daily records of the number of children in attendance and the number of meals, by type, served to enrolled children.

While sponsors may keep duplicate records, maintaining records on site at the FDCH ensures that records are available for review when a monitor or auditor arrives at the

home. Records that are kept at the provider's home also afford the State agency an audit trail and the ability to confirm the accuracy of the records at both locations.

Some might argue that the proper implementation of this existing regulation is an unnecessary administrative burden for providers. In an effort to satisfy that concern, providers must only maintain and have on hand for immediate review all records that support their program activities for the current month, as well as the previous twelve months of operation. Records should include documentation of attendance, enrollment, meal counts and menus. Providers may store the remaining two years of records offsite; however, they must still be in the control of the provider and accessible within a reasonable amount of time. If no offsite storage is used, providers must retain three years of records, onsite, at the FDCH. Records can be kept in hard copy or electronic format, provided that they are readily available to reviewers. Sponsors and providers must be aware that failure to maintain such records shall be grounds for the denial of reimbursement.

To ensure that this established Program requirement is met in conformance with the original intent of the regulation, implementation of this existing requirement should be completed no later than October 1, 2009. Questions can be addressed to Susan Bohuslaw at 860-807-2073 or susan.bohuslaw@ct.gov.

CR:sbb

K:CNShared/CNPMemos/CACFP/2009
OM#06H-09 Record Maintenance Requirements(3-25-09)

Important: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. Operational Memoranda are also posted on the Child Nutrition website at: <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=321576>