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CACFP RECORDS

All CACFP records must be maintained on site, be accessible during normal business hours, and be available for review by DPI, USDA, or other state officials within one hour of arrival, announced or unannounced.

All CACFP records must be retained on file for three Federal Fiscal Years (FFY) years plus the current FFY (October 1 through September 30), and for longer if audit findings have not been closed.

The Required Documents Checklist outlines the different CACFP forms that must be completed daily, monthly and annually.

Required Documents Checklist

Electronic Storage

Programs choosing to store documents electronically must ensure their electronic storage systems sufficiently preserve and maintain these records so they are legible and accessible for the required retention period. The agency must be able to be print these records for DPI or USDA when requested. Programs that store records electronically should have written policies and procedures that include the 11 points listed on page 2 of DPI’s resource: Electronic Storage of CACFP Records and Data.

CACFP CONTRACT

The CACFP contract must be renewed each Federal Fiscal Year to continue participation. The DPI emails the Authorized Representative when it is time to renew the contract.

An agency must update and submit its CACFP contract when changes occur during the year, such as:

- Ownership
Name of the Agency
Federal Employer Identification Number (FEIN)
Authorized Representative
Board Member changes
Change in Food Service Vendor
DCF Child Care License Changes
Site Location
Adding Meal Types Served



Failure to submit these changes and receive DPI approval in a timely manner may result in disruption of Program participation and/or reimbursement. Contact your assigned [Nutrition Program Consultant](#) when changes are made and the contract is submitted.

- Refer to the [CACFP Contract Manual](#) for instructions on how to access, update, and submit the contract.

CACFP Permanent Agreement / Policy Statement (PI-1486-AP)

The signed copy must remain permanently on file beyond the three-year retention rule.

GOVERNING BOARDS

All non-profit agencies and any for-profit agencies with governing boards must have an independent board of directors. An independent board consists of a majority of voting members:

1. Who are not **family-related** to each other as well as to staff listed on the *Staffing Personnel* page of the agency's CACFP contract.
2. Whose livelihood is independent from, and who hold no personal **financial interest** in, the agency's activities.
 - A majority is defined as 50 percent or greater of the total number of voting board members.
 - Board members must remove themselves from voting on decisions related to their own financial interest and that of family members.

Family-related members are defined as an individual's spouse, domestic partner or similar designation, and the individual's or spouse's (or domestic partner's) children, grandchildren, great grandchildren, siblings (whether by whole or half-blood), and the spouses/partners of the children, grandchildren, great grandchildren and siblings.

Financial interest is defined as receiving anything of monetary value from the agency, including but not limited to: wages, salary, consulting fees, contractor services, honoraria, equity interests (e.g., stock, stock options, or other ownership interests), interest in real or personal property, dividends, royalties, rent, capital gains, and forgiveness of debt.

The Executive Director and the Authorized Representative cannot be members of the governing board unless the agency's bylaws, articles of incorporation, or the board's policies and procedures include a resolution stating they are not eligible to vote on items relating to board decisions regarding their salary or other human resource issues that affect them, such as hiring and firing of staff.

The agency's independent governing board must be responsible for setting policy, fiscal guidance, and ongoing governance. It must regularly review the organization's policies, programs, budgets and operations, including the CACFP. Additionally, the Board should have a screening process for identifying any criminal convictions of Board members and principals/individuals delegated with CACFP responsibilities, which would disqualify these individuals from any involvement with this Program.

Board Meeting Minutes

The governing board's oversight of the agency's CACFP must be annually documented in the board minutes, which must then be retained on file and available for review.



MEAL COUNTS

The total number of meals and snacks claimed for CACFP reimbursement each month must be based on meal count records. Meal counts must be recorded separately for each meal type (breakfast, AM snack, lunch, PM snack, supper, and/or additional snack) served each day.

- Only record and claim meal counts for eligible adults (see [Guidance Memorandum 6A](#) for information on eligible adults).
- All original meal count documentation must be retained on file along with the final summary records used to calculate the total meal counts that are claimed for reimbursement.

Valid Meal Count

In order to record a participant for a meal/snack that will be claimed, all of the following requirements must be met:

1. Participant is served a meal/snack that contains all required food components and creditable foods
2. Participant is sitting and participating in the meal service
3. The entire meal/snack served to the participant is supplied by the program (families may supply one creditable component for non-medical reasons)
4. Participant is served the entire meal/snack while in the program’s care, and not sent home; and
5. Meal counts are recorded at the time of service

Time of service Meal Count:
Recorded either at the time participants are served the meal/snack or immediately after.

It is NOT acceptable to record meal counts based on who is expected to eat, before the complete meal/snack is served to participants, or from attendance records, including computerized attendance systems.

If the requirements specified above are not met, the meal counts are invalid and must not be claimed. If DPI finds during a review that invalid meal counts are claimed, those meal counts will be disallowed.

Record participants in the room in which they are physically present and served the meal/snack. This will ensure that participants are not recorded in more than one room’s meal counts for the same meal.

Meal Count Forms

When claiming three or less meal services per day use one of the following forms to record meal counts:

- [Daily Participation Record and Monthly Meal Count Summary](#): Record the total number of eligible participants who were counted for each meal/snack (also known as a “head count”).
- [Record by Name Meal Count Form](#): List full names of eligible clients. Record check mark next to each client’s name for each meal/snack served.
- Form with a similar format

When claiming more than three meal services per day record meal counts by participant to ensure that each participant is claimed for no more than two meals and one snack or two snacks and one meal per day. The “head count” method cannot be used. One of the following forms may be used:

- [Greater Than Three Meals Record](#)
- Form with a similar format
- Programs that operate more than five days per week should contact their [assigned consultant](#) for additional forms



Programs must follow steps 1-3 below for recording, tallying, and calculating accurate meal counts:

1. The meal count form must list the first and last name of each participant
2. A mark must be made (e.g. an “X” or check mark) next to each participant’s name for each meal/snack served at the time of service
3. Before tallying the number of meals for each day, the participants’ meal counts must be reviewed and any meals/snacks that exceed two meals and one snack or two snacks and one meal must be crossed off or somehow marked (e.g. with a highlighter, different colored pen) so that excess meals will not be counted.

➤ [CACFP E-Learning Course](#): *Meal Counts* lesson explains how to record valid meal counts.

ATTENDANCE RECORDS

Must maintain daily attendance records including the first and last name of each enrolled adult participant.

TRAINING

All staff, including new staff, must be adequately trained so they can perform the CACFP tasks for which they are responsible. Programs may use DPI’s [CACFP Training Agenda](#) to document CACFP training.

If a person who is primarily responsible for the CACFP leaves the agency, refer to the [New Authorized Representative or Primary Staff Responsible for CACFP](#) and contact your [Assigned Consultant](#).

Civil Rights Training

Training must be completed annually by all staff within the agency who have contact with the community, as specified in *Guidance Memorandum 8A: Civil Rights*.