

How Long Do I Keep Records?

Over the years, providers know they are required to keep their copies of menus, meal counts, enrollments, etc, but for how long?

CCNI received a memorandum from USDA dated February 24, 2009. This memo clarifies the recordkeeping question of "how long?" for providers.

It states that copies must be maintained at the provider's facility as per §226.18(e). The records maintained are each child's enrollment, daily records of the number of children in attendance and the number of meals, by type served to enrolled children, and menus. In addition, CCNI requires providers to have their permanent agreements with us on site for as long as we sponsor the provider.

We sponsors are keeping these records also, according to §226.10(d) and we are instructed to keep them three years after the date of submission of the final claim for the fiscal year to which they pertain. USDA is also now requiring that providers maintain these records for the same time frame as sponsors to provide an audit trail for the Minnesota Department of Education and confirm the accuracy of records at both locations. It also instills an internal control for the provider that assures reimbursements are accurate and no errors have occurred in the payment process.

USDA also realizes that the proper implementation of this regulation might add some burden to providers in regard to storage of copies of paperwork for three years and three months. Therefore, they agree that 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 12 months of operation.

Records should include:

1. Documentation of attendance
2. Enrollment copies
3. Meal counts
4. Menus

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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 home. ***Records can be kept in hard copy or electronic format, provided they are readily available for review.*** Failure to maintain such records shall be grounds for denial of reimbursement. Full implementation of this requirement should not be completed later than October 1, 2010.

Questions & Answers

Q. Does this mean my online claiming with Minute Menu is allowed as a storage site and I do not have to have paper copies in my home?

A. YES! As long as you are able to retrieve the records electronically, the online software is the best way to keep records.

Q. Is CCNI going to check on our past copies at their home visits?

A. CCNI staff already verifies that you keep copies of your records at the home. Sometimes, the actual claim has been mailed to CCNI, and the copies haven't been kept to verify the claim. This has led to deductions. Now we have a clearer idea of how long copies must be kept by providers, so yes, we will be looking for 12 months of records onsite. We will begin training and discussion at your next home visit.