



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

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GOVERNOR

MICHAEL F. RICE, PH.D.  
STATE SUPERINTENDENT

**MEMORANDUM**

**DATE:** August 20, 2025

**TO:** Child and Adult Care Food Program Institutions

**FROM:** Dr. Deanne K. Kelleher, RDN  
Director, Office of Nutrition Services  
State Child Nutrition Director

**SUBJECT:** Child and Adult Care Food Program (CACFP) Memo No. 5  
**Recordkeeping Requirements for Participating Institutions  
and Sponsoring Organizations - Annual Reminder**

The Michigan Department of Education (MDE) requires participating institutions to have all CACFP records for the current month, as well as the previous twelve months of operation, on-site for immediate review.

Sponsoring organizations (SOs) of centers (more than one feeding site) may store required records at the administrative office of the sponsor. For sponsored unaffiliated centers (legally distinct from the sponsor), records are to be maintained on-site at the centers. Participating institutions may store the remaining records required within the record retention guideline off-site, but they must be readily available for review. Failure to maintain these records would cause the denial of reimbursement or assessment of overclaims per federal regulations 7 CFR 226.15(e) and 226.17(c). Institutions that cannot provide records to support claims will be considered to have filed false claims per 7 CFR 226.6(c)(5)(ii), which may lead to termination and disqualification from the CACFP.

The federal regulation 7 CFR 226.10(d) establishes retention requirements for records relating to claims submitted by state agencies (SAs), sponsoring organizations, and institutions participating in the CACFP. These records must be kept for three years after the submission of the final claim for the fiscal year to which they pertain plus the current fiscal year. If, at the end of this period, there are any audit findings that have not been resolved, the records must be retained until the audit is resolved.

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The same principle applies to the retention of records relating to sponsoring organizations, institutions, and responsible principals or individuals that have been placed on the CACFP's National Disqualified List (NDL). These records pertain to the entire period that an individual or institution remains on the NDL. The documentation supporting the disqualification must be available to respond to any challenge to the SO, institution's or individual's inclusion on the NDL, or to a request for removal from the NDL. Therefore, according to the requirements in the federal regulation §7 CFR 226.10(d) concerning the retention of claims-related records, the SA, SO, or institution must retain records relating to the disqualification for three years after the SO, institution, and responsible principal or individual is removed from the NDL.

This memorandum also clarifies record retention requirements relating to an SO, institution, or family day care home that is declared seriously deficient, or a principal or individual who has been identified as responsible for a serious deficiency when the serious deficiency is corrected before disqualification. Records relating to any serious deficiency must be retained by the SA or SO for three years after the SA and USDA (for institutions or responsible principals or individuals) or the SO (for sponsored sites) accepts corrective action. This timeframe will permit the SA (or the sponsoring organization) to conduct one or more follow-up reviews to ensure that the institution has fully and permanently corrected the serious deficiency. This will also provide the necessary documentation for a proposed termination if it is found that the corrective action has not been permanently implemented.

For questions regarding this memorandum, contact the Child and Adult Care Food Program at [MDE-CACFP@michigan.gov](mailto:MDE-CACFP@michigan.gov) or 517-241-5353.