

Records Retention Requirements for the School Nutrition Programs

This document addresses the records retention requirements for the U.S. Department of Agriculture's (USDA) Child Nutrition Programs (CNPs) indicated below.

- National School Lunch Program (NSLP) [7 CFR 210.23\(c\)](#)
- School Breakfast Program (SBP) [7 CFR 220.7\(e\)\(13\)](#)
- Special Milk Program (SMP) [7 CFR 215.7\(d\)\(7\)](#)
- Food Distribution Program [7 CFR 250.19 \(a\),\(b\)](#) and [250.37 \(f\)](#)

These requirements also apply to the Fresh Fruit and Vegetable Program (FFVP) and the Afterschool Snack Program of the NSLP. These records retention requirements must be followed by all sponsors that participate in these CNPs.

USDA Requirements

All sponsors must comply with the records retention requirements below. These requirements apply to sponsors that self-operate their school food service program and sponsors that outsource their school food service program to a food service management company (FSMC) or vendor.

- Maintain all necessary records for a period of three years after submission of the final claim for reimbursement for the fiscal year.
- If audit findings have not been resolved, retain records beyond the three-year period, for as long as required to resolve the issues raised by the audit.
- Records may be kept as paper or digital.

SFAs should check with their board of education or school governing authority to determine if local record retention requirements are more stringent.

Required Records

The required records that must be maintained include all records related to the school nutrition programs. The list below includes some examples but is not all inclusive.

- **Reimbursement claims:** Supporting documentation for the claims for reimbursements, e.g., edit check worksheets, daily meal count sheets, student rosters, and all other applicable claims documentation.
- **Menus:** Supporting documentation for menus, e.g., menus, standardized recipes, production records, Child Nutrition (CN) labels, product formulation statements, Nutrition Facts labels and ingredients, and all other applicable menu and crediting documentation.
- **Income eligibility:** All approved free and reduced-price applications, denied applications, benefit issuance documents, direct certification data, and all other applicable application documentation.
- **Verification:** Supporting documentation for the verification process, e.g., the selection process, verification data for the selected households, the FNS 742 Verification Summary Report data, and all other applicable verification records.
- **Contracts:** Supporting documentation for the Request for Proposals (RFP) process for FSMC selection.
- **Procurement:** Supporting documentation for procurement including all bids and purchases, and all other applicable procurement documentation. For additional information regarding the recordkeeping requirements for procurement transactions, refer to [USDA Memo SP16-2006: Record-Keeping Requirements](#).

- **Civil rights:** Supporting documentation for civil rights, such as complaint log, training records, and special diet accommodations.
- **Monitoring:** Supporting documentation for monitoring, including copies of completed monitoring reports.
- **Professional standards:** Supporting documentation for professional standards including annual training records. For more information, refer to the USDA's [Guide to Professional Standards for School Nutrition Programs](#).

Additional Requirements for Community Eligibility Provision (CEP) Schools

Per [7 CFR 245.9\(h\)\(3\)](#) sponsors with schools participating in the CEP must also maintain records that include:

- documentation used to develop the individualized student percentage (ISP);
- total number of breakfasts and lunches served daily;
- percentages used to claim meal reimbursements; and
- non-federal funding sources used to cover any excess meal costs.

Such records shall be retained during the period the community eligibility provision is in effect, including all extensions, plus three fiscal years after the submission of the last Claim for Reimbursement which was based on the data. If a sponsor chooses to return to standard counting and claiming, sponsors must ensure records are maintained and documentation must be made available at any reasonable time for review and audit purposes. In any case, if audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.

ISP documentation includes Point of Service reports, Student Information System reports, direct certification lists and/or other lists certifying students are categorically eligible for free school meals, such as lists of students who are designated as homeless. All other standard recordkeeping requirements (such as meal counts and production records) continue to apply (refer to “Required Records” in this document). Sponsors must retain all documentation for the prescribed period.

Record Retention Schedule- Current School Year Plus 3

Current Year	Keep Through	Dispose
SY 24-25	SY 21-22	SY 20-21
SY 25-26	SY 22-23	SY 21-22
SY 26-27	SY 23-24	SY 22-23
SY 27-28	SY 24-25	SY 23-24
SY 28-29	SY 25-26	SY 24-25
SY 29-30	SY 26-27	SY 25-26

For questions or additional guidance on these requirements, sponsors should contact the school nutrition programs at mde-schoolnutrition@michigan.gov.