

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 (CNP) 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 (FDP) [7 CFR 250.19 \(a\),\(b\)](#) and [250.37 \(f\)](#)

These requirements also apply to the [Fresh Fruit and Vegetable Program \(FFVP\)](#), [Afterschool Snack Program \(ASP\)](#) of the NSLP, and [Seamless Summer Option \(SSO\)](#) of the NSLP.

These records retention requirements must be followed by all local educational agencies (LEAs) that participate in these CNPs.

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USDA Requirements

All school food authorities (SFAs) must comply with the records retention requirements below. These requirements apply to LEAs that self-operate their school food service program and LEAs that outsource their school food service program to a [food service management company](#) (FSMC).

- 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.

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. For forms and guidance, visit the CSDE's [Forms for School Nutrition Programs](#) webpage.
- **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. For additional guidance on the required menu documentation, refer to the CSDE's [Guide to Required Menu Records for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12](#).
- **Competitive foods:** Supporting documentation that all competitive foods available for sale to students on school premises comply with the applicable federal and state standards and requirements (USDA [Smart Snacks Nutrition Standards](#), [Connecticut Nutrition Standards](#), and the [state beverage law](#)). This includes all required [Healthy Food Certification \(HFC\) documentation](#) for public school districts that choose the healthy food option of HFC under Section 10-215f of the Connecticut General Statutes (C.G.S.)

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- **Income eligibility:** All approved free and reduced-price applications, denied applications, benefit issuance documents, direct certification data, and all other applicable application documentation. Applicable forms and guidance are available on the CSDE's [Eligibility for Free and Reduced-price Meals and Free Milk in School Nutrition Programs](#) webpage and the [Direct Certification for School Nutrition Programs](#) webpage.
- **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. Verification forms and guidance are available on the CSDE's [Verification Procedures for School Nutrition Programs](#) webpage.
- **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.
- **Monitoring:** Supporting documentation for monitoring, including copies of completed monitoring reports. The required monitoring forms are available in the "[Monitoring Forms](#)" section of the CSDE's Forms for School Nutrition Programs webpage.
- **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](#) and visit the CSDE's [Professional Standards for School Nutrition Professionals](#) webpage.

For questions or additional guidance on these requirements, SFAs should contact their assigned [school nutrition team member](#).

Additional Requirements for Community Eligibility Provision (CEP) Schools

LEAs 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;
- non-federal funding sources used to cover any excess meal costs; and

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- school-level information provided to the CSDE for publication, if applicable.

If an LEA or school chooses to return to standard counting and claiming, section [7 CFR 245.9\(h\)\(3\)](#) requires the LEA to maintain the ISP documentation for three years after submission of the last claim for reimbursement which was based on the data. In addition, this documentation must be retained beyond the three-year period for as long as required to resolve any issues raised by an audit.

Failure to retain required documentation may result in removal from the CEP and/or fiscal action. 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. Applicable forms and guidance are available on the CSDE's [Community Eligibility Provision \(CEP\)](#) webpage.

All other standard recordkeeping requirements (such as meal counts and production records) continue to apply (refer to “[Required Records](#)” in this document). LEAs must retain all documentation for the prescribed period.

Resources

Child Nutrition (CN) Labels (CSDE's Crediting Foods in School Nutrition Programs webpage):
<https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs#CNlabels>

Community Eligibility Provision (CEP) (CSDE webpage):
<https://portal.ct.gov/sde/nutrition/community-eligibility-provision>

Direct Certification for School Nutrition Programs (CSDE webpage):
<https://portal.ct.gov/sde/nutrition/direct-certification/documents>

Edit Check Forms (“Documents/Forms” section of CSDE's Meal Counting and Claiming for School Nutrition Programs webpage):
<https://portal.ct.gov/sde/nutrition/meal-counting-and-claiming-for-school-nutrition-programs/documents#EditCheckForms>

Eligibility for Free and Reduced-price Meals and Free Milk in School Nutrition Programs (CSDE webpage):
<https://portal.ct.gov/sde/nutrition/eligibility-for-free-and-reduced-price-meals-and-free-milk-in-school-nutrition-programs/documents>

Food Service Management Company (CSDE webpage):
<https://portal.ct.gov/sde/nutrition/food-service-management-company>

Forms for School Nutrition Programs (CSDE webpage):
<https://portal.ct.gov/sde/nutrition/forms-for-school-nutrition-programs>

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Guide to Professional Standards for School Nutrition Programs (USDA):

<https://doe.sd.gov/CANS/documents/Standards-SNP21.pdf>

Guide to Required Menu Records for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12 (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/mpg/guide_menu_records_nslp_sbp_k12.pdf

Meal Count Forms (“Documents/Forms” section of CSDE’s Meal Counting and Claiming for School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/meal-counting-and-claiming-for-school-nutrition-programs/documents#MealCountForms>

Product Formulation Statements (CSDE’s Crediting Foods in School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs#PFS>

Production Records for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/production-records-for-school-nutrition-programs>

Professional Standards for School Nutrition Professionals (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/professional-standards-for-school-nutrition-professionals>

Standardized Recipes (CSDE’s Crediting Foods in School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs#StandardizedRecipes>

USDA Memo SP 05-2025, CACFP 04-2025, SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements:

<https://www.fns.usda.gov/cn/labeling/guidance-accepting-processed-product-documentation>

USDA Memo SP16-2006: Record-Keeping Requirements:

<https://www.fns.usda.gov/cn/record-keeping-requirements>

Verification Procedures for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/verification-procedures-for-school-nutrition-programs>

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For more information, contact the [school nutrition programs staff](#) at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/records_retention_snp.pdf

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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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