



Food and  
Nutrition  
Service

DATE: June 30, 2017

Park Office  
Center

MEMO CODE: CACFP 17-2017

3101 Park  
Center Drive  
Alexandria  
VA 22302

SUBJECT: Documenting Meals in the Child and Adult Care Food Program

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

The purpose of this memorandum is to provide guidance on how meals served in the Child and Adult Care Food Program (CACFP) must be documented to demonstrate compliance with the meal pattern requirements under 7 CFR 226.20.

On April 25, 2016, the U.S. Department of Agriculture's Food and Nutrition Service (FNS) published the final rule "*Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010*" (81 FR 24348) to update the CACFP meal pattern requirements in 7 CFR 226.20. While the final rule did not change the recordkeeping requirements in the CACFP, FNS has received numerous questions regarding the monitoring and documentation of the updated meal pattern requirements. In response, FNS is providing the following clarification on how meals must be monitored and documented.

CACFP centers and day care homes are required to demonstrate that they are serving meals that meet the meal pattern requirements. Centers and day care homes must keep records of menus (7 CFR 226.15(e)(10)). However, State agencies have the authority to determine other types of acceptable recordkeeping documents required to demonstrate compliance with the meal patterns (7 CFR 226.15(e)). For example, a State agency may require centers to keep meal production records in addition to their menus.

To the extent practicable, State agencies should not impose additional paperwork requirements to demonstrate compliance with the updated meal pattern requirements. Rather, FNS encourages State agencies to maintain current recordkeeping requirements or update existing forms to avoid any additional burden.

FNS will revise the following policy guidance to further clarify meal documentation requirements and offer best practices for demonstrating compliance with the meal pattern requirements:

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

- CACFP 17-2016, *Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program; Questions and Answers*, July 14, 2016;
- CACFP 02-2017, *Grain Requirements in the Child and Adult Care Food Program*, October 14, 2016;
- CACFP 06-2017, *Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers*, January 17, 2017; and
- CACFP 08-2017, *Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program*, March 10, 2017.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at <https://www.fns.usda.gov/cacfp/cacfp-contacts>. State agencies should direct questions to the appropriate FNS Regional Office.

**Original Signed**

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