

Recordkeeping Requirements

State agencies have established an array of processes for assessing the accuracy of an LEA's ISP(s). States opting to follow the Administrative Review procedures (i.e., locate 10 percent, or a statistically valid sample, of identified student names on appropriate source documentation) must, at a minimum, as part of the Administrative Review records, maintain the following ISP data for LEAs and schools participating in CEP:

- A list of all of the identified students, with their ISP classification, used to determine the ISP from all schools participating in CEP from each district;
- Documentation for the total enrollment at all CEP schools;
- The sample list of students that the State agency used to verify the initial ISP; and
- The ISP worksheet the LEAs used to calculate the ISP(s) and submitted to State agencies with appropriate documentation.

For more information, please see *SP 15-2016: CEP State Agency Procedures to Ensure Identified Student Percentage Accuracy*, November 30, 2015 (<http://www.fns.usda.gov/cep-state-agency-procedures-ensure-identified-student-percentage-accuracy>).

State agencies are required to maintain Program records as necessary to support the reimbursement payments made to SFAs (7 CFR 210.5(d)). Furthermore, 7 CFR 210.23(c) requires records to be retained for a period of three years after the date of submission of the final Financial Status Report for the fiscal year. Therefore, State agencies that opt to establish their own processes for validating an ISP at the time CEP is elected must maintain documentation used to confirm the current claiming ISP for the entire time an LEA or school operates CEP, and for three years after submission of the LEA's final Claim for Reimbursement for the last fiscal year of CEP. 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 issues raised by the audit.

LEAs must maintain source documentation used to validate the ISP for the entire time an LEA or school operates CEP. If an LEA or school chooses to return to standard counting and claiming, the LEA must maintain the source documentation for three years after submission of the final Claim for Reimbursement for the last fiscal year of CEP. In addition, **this documentation must be retained for three years after submission of the final claim for reimbursement under that claiming percentage and beyond the three-year period as long as required for the resolution of any issues raised by an audit. Failure to retain required documentation may result in removal from CEP and/or fiscal action.**

All other standard recordkeeping requirements (meal counts, production records, etc.) continue to apply and documentation must be retained for the prescribed period.