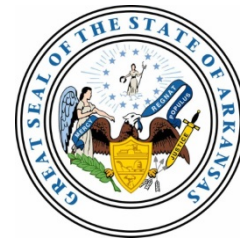




Division of Child Care and Early Childhood Education

P.O. Box 1437, Slot S140 · Little Rock, AR 72203-1437
501-682-8590 · Fax: 501-683-6060 · TDD: 501-682-1550



MEMORANDUM

TO: All USDA Program Participants (CACFP/At-Risk/NSLP/SFSP)
FROM: DCCECE / HNU
DATE: 06/14/2021
SUBJECT: Arkansas DHS Health and Nutrition Q & A – Meal Count Requirements

This is a notice containing guidance and clarification from Arkansas DHS and USDA regarding meal count requirements for CACFP/At-Risk/NSLP/SFSP programs.

Point of Service vs. Time of Service Arkansas DHS Health and Nutrition Q & A

Q: When should meal counts be done in NSLP Programs?

A: Point of Service (POS) – the point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid meal has been served to an eligible child. Below are the steps required for NSLP programs documenting POS meal counts:

1. The meal is observed at the Point of Service to ensure the counting system yields an accurate count of reimbursable meals.
2. Student obtains a reimbursable meal for breakfast, lunch or snack when the following is met:
 - Meal contains the required meal component by age group.
 - Student receives tray with all of the required components and does not remove any component from the tray while at the Point of Service.
3. School Food Authority or State Agency can only count the meal as creditable if the meal meets the requirement in #2.
4. Meal count documentation (master list, roster, etc.) is reviewed to ensure the meal counts are counted, consolidated, yield an accurate count and does not exceed the number of eligible students by category (i.e., free, reduced price, and paid).

Q: When should meal counts be done in SFSP Programs?

A: Point of Service (POS) – the point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid lunch has been served to an eligible child. As a child is observed being served they are to be documented by someone assigned to do the counting for that meal service. Attendance alone cannot be used to document meal service. (see USDA handout “Accurate Meal Counting And Claiming in the SFSP”)

Q: When should meal counts be done in CACFP?

A. Time of Service – the time in which the meal is served to eligible children.

- **CFR §226.17 Child care center provisions.**
(b) All child care centers, independent or sponsored, shall meet the following requirements
(9) Each child care center must maintain daily records of *time of service* meal counts by type (breakfast, lunch, supper, and snacks) served to enrolled children, and to adults performing labor necessary to the food service

Q: When should meal counts be done in CACFP At-Risk Programs?

A: Time of Service – the time in which the meal is served to eligible children.

- State Agency Policy for At-Risk - Although At-Risk Programs are not required by federal regulations to take “Point of Service” records during a meal service, time of service meal counts are still required per DHS State Requirements for all CACFP Programs. This means that meal counts are required to be taken during the meal service for CACFP and CACFP At-Risk programs as the eligible participants are receiving their meals/
Attendance alone is not to be used to document meal counts.

Please keep this memo on file for quick and easy reference. A copy is also available on the resource library under HNP Mass Alerts. If you have any questions regarding this memo, please contact your Health and Nutrition Unit at: 501-682-8869.