Recently, we issued policy that discussed the allowability of having a multi-use F/RP application in the National School Lunch Program. That policy and the restrictions for such a multi-program application were outlined in SP 92-199, dated June 26, 1992. The policy disseminated was restricted to applications for school nutrition programs; however, we are taking the opportunity in this memorandum to discuss its relevance to the CACFP.

1. SP 92-202/CACFP-306 dated July 2, 1992 clearly discusses using F/RP information for CACFP determinations when the school food authority (SFA) also administers the CACFP and clarifies the conditions under which direct certification information can be used for eligibility determinations.

2. We have raised the question if non-school CACFP institutions can also pursue establishing a multi-use application. At this time, this is not being extended to CACFP institutions. There was considerable internal deliberation and negotiation with the Office of General Counsel to be able to allow this for school applications. One factor that influenced the allowability was the relatively stable administrative structure of schools. Given the varied administrative situations that exist with CACFP institutions, the Department does not intend to extend this allowability to CACFP institutions.

3. We inquired if a SFA could simply put "CACFP" as an authorized receiver of the information without specifically identifying the organization/institution. This is not allowable, as the June 26 guidelines discuss the need to precisely define the agencies the information will be shared with and the need to enter into a memorandum of understanding with the receiving entity.
4. In developing a multi-use application, a State Agency (SA) or SFA could identify CACFP as a Program at a particular center that the information would be provided to leaving space for the household to specifically identify said center. If a SA or SFA wanted to pursue this, it must ensure that Item 7 of our June 26 memo was also accomplished (memo of understanding).

5. For larger CACFP entities (such as Head Start programs administered by private nonprofit (PNP) agencies or outside school hours programs operated by PNP agencies in schools under an agreement with the local school board), a SA or SFA could develop a multi-use application identifying that the information would be shared with said organization/program for purposes of determining eligibility for CACFP benefits. Again, all the conditions outlined in our June 26 memo would apply with emphasis that a memo of understanding would need to be in place with the SA or SFA and the organization.

6. If SA or SFA developed a CACFP specific multi-use application outlined above in Items 4 and 5, the center using the multi-use application originally taken by a school must have a copy of the application on file themselves. It would not be acceptable for the center to accept a list of qualified F/RP participants from the school as documentation. The center or organization must have a copy of the application on file. In addition, the center/organization needs to know that, although they can use the information provided on the applications, they need to do the determination for themselves. Each entity using the multi-use application (school and center) is individually responsible for the determination; one entity does not assume responsibility for the other. A SA or SFA could set up a multi-use application procedure whereby copies of the applications are given to the sponsoring organization (SO) (such as the PNP organization administering the local Head Start programs in the county). Nothing precludes that SO from either forwarding copies of the applications to the individual centers or the SO simply sending a list of eligible children for CACFP to the individual centers.

7. In light of the policy in SP 92-202/CACFP-306 which allows non-school centers to use direct certification information if the information is given to the centers by the parents (and not directly from the school to the center), non-school centers can use the school program's F/RP application if the parent provides a copy of
it to the center. Just as in Item 6 above, the center would be responsible for reviewing/making a determination of the information for CACFP purposes.

For your easy reference, we have included a copy of SP 92-199. If you have any questions on the above, do not hesitate to contact our staff at (303) 844-0359.

ANN C. HECTOR
Regional Director
Special Nutrition Programs

Attachment