Reply to
Attn. of:
SP 92-192
CACFP 294
SFSP 160

Subject: Documentation of Free and Reduced Price Meal Eligibility for Homeless Children

To: STATE AGENCY DIRECTORS (Special Nutrition Programs)
- Colorado ED, Colorado DH, Colorado SS,
  Iowa, Kansas, Missouri ED, Missouri DH,
  Montana OFI, Montana DHSS, Nebraska ED,
  Nebraska SS, North Dakota, South Dakota,
  Utah, Wyoming ED, Wyoming DH/SS

As many of us are well aware, the problem of homelessness is increasing in our nation. Although homelessness is especially prevalent in large cities, it is also a problem in small cities and rural areas. The Department wants to ensure that free meals are available for all eligible children, including the homeless, in an expeditious manner and that the certification process is not overly burdensome or an impediment to participation. To assist those responsible for eligibility determinations in meeting the nutritional needs of homeless children, the Department is establishing a nationwide policy to simplify access to the child nutrition programs for homeless children whose parents/guardians fail to return a free and reduced price application or who are not certified under direct certification procedures.

Under the school nutrition programs, if the household does not complete an application for the child, current policy authorizes school officials to complete an application on the child's behalf based on their personal knowledge that the child qualifies for benefits. This authority is intended to be exercised on a case-by-case basis and not categorically to whole groups of children. However, because the number of homeless children has risen dramatically over the past few years, the Department recognizes that there is an increasing need for some schools and institutions to make these determinations for a number of children. The Department is also aware that organizations participating in other child nutrition programs may find themselves in the same position. To address this situation and to alleviate concerns at the State and local levels about the propriety of making these determinations, the Department is establishing the following procedures for all of the child nutrition programs.

When an application is not submitted by the household or it is not anticipated that an application will be submitted, it is acceptable for the director of the homeless shelter at which the child resides to complete and submit an application for the child; or local level officials may complete an application for a child and approve the child for free meals based solely on their knowledge that the child's address is a homeless shelter or that the child has no known address and is indeed homeless. Moreover, when it is not practical for those officials to complete individual applications because of large numbers of homeless children or for some other reason, documentation to substantiate free meal eligibility may consist of a list containing the following information:

FNS FORM-607 (7-88)
* Child's name
* Effective date
* Date of withdrawal
* Residence (shelter, etc.)
* Signature of determining official

Because members of the homeless population are frequently transient and their circumstances may change, it is particularly important to update any list used to document eligibility when changes occur. The objective is to keep the list of eligible children current by removing names of children who have left the school or institution or whose circumstances have changed, and by adding new names to the list.

We hope this procedure will assist in responding to the nutritional needs of homeless children. Please let us know if you have any questions about this policy or need further clarification.

Ann C. Hector
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Regional Director
Special Nutrition Programs