



North Carolina Department of Health and Human Services
Division of Public Health Women's & Children's Health Section

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April 22, 2002

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TO: Institutions participating in the Child and Adult Food Program

FROM: Arnette Cowan, MS, RD, LDN, Head
Special Nutrition Programs Unit

SUBJECT: Documentation of Free Meal Eligibility for Homeless Child and Adults (226.23-08)

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. We want to ensure that free meals are available for all eligible children and adults, 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 Food and Nutrition Service (FNS) is establishing a nationwide policy to simplify access to the Child Nutrition Programs for homeless children and adults whose parents/guardians fail to return a free and reduced price application, or who are not certified under direct certification procedures.

When an application is not submitted by the household, or it is not anticipated that an application will be submitted, it is acceptable: 1) for the director of the homeless shelter at which the child or adult resides to complete and submit an application for that individual; or 2) local level officials may complete an application for a child or adult and approve that individual for free meals based solely on their knowledge that the individual's address is a homeless shelter or that the individual 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/adults or for some other reason, documentation to substantiate free meal eligibility may consist of a list containing the following information:

- * Child's/Adult's name
- * Effective date
- * Date of withdrawal
- * Residence (shelter, etc.)
- * Signature of determining official

Because the homeless population is often very transient and their circumstances may change, when using a list to document eligibility, it is particularly important that the list is updated as changes occur. The objective is to keep the list of eligibles current, removing names of individuals who may have left the



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school or institution or whose circumstances may have changed and adding new names to the list. It has been noted that FNS Instruction 765-2 prohibits officials of nonpricing programs from completing applications on behalf of their participants, since benefits resulting from this action would accrue to the school or institution, not to the child and his or her family. In this case the possibility of fraud or abuse increases significantly. In spite of the fact that this memorandum and FNS Instruction 765-2 deal with much the same issue, this policy should be considered separate from the Instruction. This memorandum recognizes the particular status of homeless children and adults and is a special effort on the part of FNS to assist them in meeting their nutritional needs. The Food and Nutrition Service believes that the potential abuse is of such a limited scope that it is far outweighed by the need to further avoid complicating the lives of the homeless and those institutions which serve them. Therefore, local level officials (of pricing and nonpricing programs) may complete applications on behalf of and approve free meals for their homeless participants, or retain a list of homeless individuals if it is impractical to complete individual applications. We hope this procedure will assist in responding to the nutritional needs of homeless children and adults.

If you have any questions, please contact your regional consultant.

AC/clg

cc: SNP Staff
Auditors