

United States Department of Agriculture
Food and Nutrition Service

Southeast Region

225.14-01: Changes to Free and Reduced Price Applications in the CACFP and SFSP

May 8, 1998

All State Directors:
Summer Food Service Program (SFSP)
Southeast Region

This memorandum is a restatement of policy previously issued as SFSP Policy Memorandum 90-06, on May 25, 1990. Any changes made to the original text are in **bold**.

As you are aware, Public Law 101-147 made several changes affecting the process of approving free and reduced-price applications as well as the application itself. The changes include (1) limiting the social security numbers required to that of "...the ~~parent~~ guardian who is the primary wage earner responsible for the care of the child for whom the application is made, or that of another appropriate adult member of the child's household...", (2) requiring households to submit household income information so that the school food authority may calculate the total income, and (3) allowing schools to certify children eligible for free or reduced price meals "...by directly communicating with the appropriate State or local agency to obtain documentation..." relative to a child's membership in a Food Stamp household or a family receiving benefits under **Temporary Assistance to Needy Families**. We published interim regulations implementing the first two of these provisions in schools on May 9, 1990 (55 FR 19237). The third has been included in a proposed rule which is currently in clearance.

Child and Adult Care Food Programs (CACFP)

With regard to the applications of these provisions to the CACFP, we have determined that, at least for the present, we will implement only the first two. Both are contained in an interim regulation currently in clearance and will be effective as of July 1, 1990. In the absence of a published regulation and in recognition of the need to provide information well in advance of the upcoming fiscal year, this memorandum will provide guidance as to what changes are to be made on free or reduced-price applications for the CACFP.

Free and reduced-price applications taken after July 1, 1990, must contain the social security number of

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either the parent or guardian who is the primary wage earner or the adult household member who signs the application. No other social security number need be submitted. As provided in existing regulations, if neither the primary wage earner nor the adult household member who signs the application has a social security number, the household may so indicate in lieu of providing a number. In addition to the above, the new application need only collect the appropriate household income information by source. Such information is to be totaled by the institution. Finally, elimination of the required reporting of all adult household members' social security numbers will result in certain changes to the Privacy Act statement found on the free and reduced-price application. In this regard, the above-referenced rule affecting school programs should be consulted.

Summer Food Service Program (SFSP)

Changes in the free and reduced-price application used in the SFSP after July 1, 1990, will be identical to those described above for the CACFP. With regard to the overall use of free and reduced-price applications in the SFSP, we believe there is need for some flexibility in determining which application should be used in the upcoming summer. We are assuming that most free and reduced-price applications will have been taken by July 1 and, based on the pre-July 1 requirements those applications should require that all social security numbers be provided and total income reported. Similarly, applications taken after July 1 should reflect the change in the statute. However, consistent with the philosophy expressed in our memoranda of January 16 and February 8, ("Income Documentation and Social Security Numbers" and "State Agency/RO Monitoring of Eligibility Determinations") and the recently published SFSP Sponsor Handbook which contains the new application, as well as the difficulty in ensuring that all State agencies and sponsors receive appropriate information in a timely fashion, we believe that the use of either application should be considered acceptable for this summer.

If you have any questions or comments, please contact our office.

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