

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



May 8, 1987

ALL COUNTY LETTER NO. 87-69

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: PURCHASE OF PREPARED MEALS BY HOMELESS FOOD STAMP RECIPIENTS

This letter is to provide the county welfare departments (CWDs) with instructions to implement provisions of Public Law 99-570 and federal regulations published in Federal Register Vol. 52, No. 47, dated Wednesday, March 11, 1987. The Public Law and the federal regulations provide that effective not later than April 1, 1987, homeless food stamp recipients (including newly eligible temporary residents of shelters for the homeless) may use their food stamps to purchase prepared meals served by an authorized public or private nonprofit establishment that feeds homeless persons (homeless meal providers).

All homeless meal providers wishing to accept food stamps from homeless persons must be authorized by the Food and Nutrition Service (FNS) as a retailer. Applicant meal providers are also responsible for acquiring county agency approval and must provide FNS with written documentation of this approval prior to authorization.

It should be noted that the term "approval" used throughout this letter is an FNS term and intended to mean only the county agency's determination that the meal provider serves or intends to serve prepared meals to the homeless. The CWDs will be responsible to grant these approvals or may designate an appropriate county agency to make these determinations. The approval process does not necessarily include on-site visits and can be as simple as accepting a self-certification by the facility that it serves meals to the homeless. The approval may be granted indefinitely (but not beyond September 30, 1990 when the provisions cease to be effective), unless there is evidence that the site is no longer serving meals to the homeless. The Department is currently in the process of designing a self-certification form which may be used by the CWDs or their designees. This is not a required form, and we understand that FNS will accept any written documentation which provides the approval by a county agency.

The homeless meal providers will be responsible for submitting the written documentation of county approval to FNS. We understand that FNS is planning on-site visits as part of the authorization process. This process must be completed within 30 days of the receipt of the facility's request. Attached is a listing of the appropriate FNS field offices that will be responsible for the authorization process.

The new federal regulations also establish a definition of a "homeless food stamp household" as one that does not have a fixed mailing address or permanently reside in a dwelling. These households are the only food stamp households that are allowed to use their food stamps in the shelters or other establishments that serve prepared meals for the homeless and other needy persons.

These new federal provisions also permit temporary residents of shelters for the homeless to participate in the Food Stamp Program, and prohibits homeless meal providers from acting as authorized representatives for homeless food stamp recipients. CWDs should implement these changes as soon as possible, but no later than June 1, 1987.

Another provision in the federal rules prohibits homeless meal providers from providing cash change or credit slips to homeless persons for food stamps received in exchange for prepared meals. Although it is not required, CWDs may want to consider the issuance of all or a large portion of the food stamp allotment in \$1 coupons (\$2 books). This option may serve to facilitate the change-making process for homeless food stamp recipients and for authorized homeless meal providers. If this option is chosen, the CWD should ensure that coupon inventories are adequate to meet this demand by ordering additional \$2 books as appropriate.

As you know, the problems of the homeless have gained national attention, and these changes reflect the federal intent that homeless persons be able to take maximum advantage of their food stamp benefits. We appreciate your cooperation in implementing these changes in such a short time period. To assist you with the implementation, we have also attached a list of questions and answers.

Emergency regulations are being developed, however, in the interim, if you have any questions, please feel free to call the AFDC/FS Policy Implementation Bureau at (916) 322-5330.


ROBERT A MOREL
Deputy Director

Attachment

cc: CWDA

UNITED STATES AGRICULTURE
USDA FOOD AND NUTRITION SERVICE-FIELD OFFICES

NORTHERN CALIFORNIA:

San Francisco Field Office

Service Areas:

USDA Food and Nutrition Service
550 Kearny Street, Room 330
San Francisco, CA 94108
(415) 556-8574

Alameda	Monterey	Santa Clara
Contra Costa	Napa	Santa Cruz
Lake	San Benito	Solano
Marin	San Francisco	Sonoma
Mendocino	San Mateo	

Fresno Field Location

Service Areas:

USDA Food and Nutrition Service
1313 P Street, Suite 101
Fresno, CA 93721
(209) 487-5336

Fresno	Madera
Kern	San Luis Obispo
Kings	Tulare

Sacramento Field Office

Service Areas:

USDA Food and Nutrition Service
2424 Arden Way, Room 67
Sacramento, CA 95825
(916) 978-4257

Alpine	Merced	Sierra
Amador	Mono	Stanislaus
Calaveras	Nevada	Sutter
El Dorado	Placer	Tuolumne
Inyo	Sacramento	Yolo
Mariposa	San Joaquin	Yuba

Redding Field Location

Service Areas:

USDA Food and Nutrition Service
1135 Pine Street, Suite 203
Redding, CA 96001
(916) 246-5333

Butte	Humboldt	Shasta
Colusa	Lassen	Siskiyou
Del Norte	Modoc	Tehama
Glenn	Plumas	Trinity

SOUTHERN CALIFORNIA:

San Diego Field Office

Service Areas:

USDA Food and Nutrition Service
880 Front Street, Room 4-S-25
San Diego, CA 92188
(619) 293-5291

Imperial
Orange
San Diego

Colton Field Location

Service Areas:

USDA Food and Nutrition Service
655 North La Cadena Avenue, Suite 4
Colton, CA 92324
(714) 351-6655

Riverside
San Bernardino

Los Angeles Field Office

Service Areas:

USDA Food and Nutrition Service
845 South Figueroa Street, Room 311
Los Angeles, CA 90017
(213) 894-3179
(213) 894-3178 (recording)

Los Angeles
Santa Barbara
Ventura

Homeless
Questions and Answers

1. Q. If a provider runs (or serves food in) several facilities, does a separate determination have to be made for each site?

A. Yes.

2. Q. If a facility serves prepared meals to the homeless, does the county have the option of not approving the facility for some other reason?

A. No.

3. Q. If a county does not approve a provider, is a written reason necessary?

A. If the county uses a self-certification system, the certification itself constitutes an approval; however, if the self-certification form is not complete, the county should return the form to a meal provider with appropriate instructions. If the county chooses a system other than self-certification, the method of disapproving is left to the county.

4. Q. How does a CWD (or representative) rescind an approval once it is granted? (For instance, it comes to the county's attention that a facility is no longer serving the homeless.) Does the provider have appeal rights?

A. A letter from the county would be sent to the provider with a copy to FNS. At this time there are no plans for DSS to develop a form letter to rescind an approval. There is no requirement that the CWD provide appeal rights to the provider.

5. Q. Is the CWD required to keep track of all the sites that have been approved?

A. There is no requirement that the county keep track of this information; however, for referral purposes it is suggested the CWD keep a list of those sites known to serve meals to the homeless.

6. Q. The providers will be swearing that they serve prepared meals to the homeless and will be instructed to accept food stamps only from those people. How will they identify the target group?

A. FNS has indicated that a verbal statement by the recipient that he/she is homeless is acceptable unless information to the contrary is known to the provider.

7. Q. Can the applicant send their "approved" form to any FNS office? It could be that the "parent" organization (e.g., Catholic Social Services) would be listed as the provider with headquarters in Sacramento but the place where the meals are actually served is in the Bay Area.

A. The provider should send the request to the FNS office that serves the area where the meals are served.

8. Q. What is the definition of a temporary resident of a shelter for the homeless?

A. When a person is staying in a shelter for the homeless in which residency is time limited (for any length of time), that individual is considered a temporary resident of a shelter for the homeless.

9. Q. If a "homeless" person is temporarily staying in a shelter for the homeless that provides free meals three times a day, are they now eligible for food stamps under the new regulations? Or do they have to be staying at a shelter that charges for meals and is authorized to accept food stamp coupons?

A. If otherwise eligible, a temporary resident of a shelter for the homeless is eligible for food stamps.

Temporary residents of a shelter for the homeless that provides them with the majority of their meals are no longer considered as residents of an institution.