

October 1, 2013

CalFresh Program Guide Letter #588

Subject Homeless and Unaccompanied Youth

Reference All County Informing Notice (ACIN) I-39-13, I-45-11; and Manual of Policies and Procedures 63-102, 63-402.

Purpose To provide staff with clarification of policies regarding the treatment of homeless and unaccompanied youth in the CalFresh Program. This letter addresses reports of barriers to program access specifically faced by homeless and unaccompanied youth.

Additional clarifications have been added to address common misconceptions and confusion regarding household concept in the CalFresh Program.

Background Based on reports from community based organizations (CBOs) both in San Diego and throughout the Country, the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), released clarification regarding the treatment of homeless youth in the Supplemental Nutrition Assistance Program (SNAP); known as CalFresh in California.

Unaccompanied homeless youths are individuals who are not in the physical custody of a parent or guardian. As there is no age requirement to apply for CalFresh benefits, these individuals should be allowed to apply for CalFresh benefits on their own.

Prior to the release of the SNAP clarification, San Diego County had taken proactive steps in addressing the issue in the [May 2013 Eligibility Operations Newsletter](#), the addition of the [Homeless Children and Youth Applying for CalFresh](#) desk aid for staff in [63-650.5](#) and its regular participation in the Unaccompanied Youth Task Force. As with FNS, San Diego County is committed to reducing barriers and improving program information in order to help eligible vulnerable populations, including homeless youths, obtain the food they need for good health.

Policy Reminders

The following policies apply to homeless and unaccompanied youth:

- **Definition of homeless** as contained in section [63-152.6](#).

This includes individuals who are “couch surfing” as they lack a fixed and regular nighttime residence and may have a temporary accommodation in the residence of another individual for no more than 90 days.

- **Identification** as contained in [63-117.10](#) and [63-152.2](#).

It is a common misconception that an official photographic identification is needed to apply for CalFresh. CalFresh is flexible in what documents are required to verify an applicant’s identity.

- **Residency requirements** as contained in [63-117.12](#) and [63-152.4](#).

There is no requirement for a permanent address in order to be eligible for CalFresh. Moreover, homeless households are specifically exempted from the requirement to verify residency. CalFresh regulations provide that verification of residency “should be accomplished to the extent possible” and provides flexibility regarding what documents may be used to verify residency.

The [CalFresh Verification Requirements Chart](#) can assist staff in identifying what documents can be used for Identity and Residency.

- **Age requirement.**

There is a misconception in CalFresh that there is an age requirement. While this is the standard in most cases, youth who are not living with their parents are **not** required to apply as part of their parent’s household. As provided by regulations in section [63-101](#), an individual must apply as a household with the other people he/she lives with if they customarily purchase and prepare food together.

However, minor regulations provide that a child under “parental control” must apply as part of the same household as the adult, if the child meets the definition under section C. of [63-101.4](#). While some homeless youth may fall under parental control of a non-parent household member, other homeless youth may not. Anyone who, under CalFresh Policy, is considered an individual living alone should be afforded the opportunity to apply as a one person household.

Summary of Changes

Section	Section Title	Update
63-101.2	Definitions	Added the Definition of Unaccompanied Homeless Youths
63-101.4	Restricted Household Status	Included information that there are no age requirements in the CalFresh Program
63-101.6	Excluded Household Members	Added link to assist with treatment of income for excluded members fitting two categories
63-101.7	Foster Care Children	Included clarification for children receiving Kin-Gap
63-101.8	Boarders	Added clarification that households which contain a boarder may participate in CalFresh and may choose whether to include or exclude the boarder
63-101.12	Participation of Strikers	Revised language and steps for determining Striker Household's eligibility

Updates to the CalFresh Program Guide are noted with highlighted text.

Automation Impact

No Impact.

Document Capture

No impact.

Homeless Fact Sheet

FNS has also released the “Questions and Answers about SNAP for Homeless Persons” fact sheet. This fact sheet may be used for outreach activities with homeless youth and is available at the following web address:

http://www.fns.usda.gov/snap/outreach/pdfs/Homeless_QA.pdf

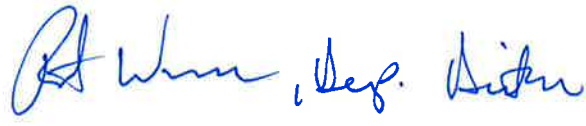
**Other
Programs
Impact**

Each program has separate regulations regarding items such as Identity, Residency and Age Requirements. **The information contained in this letter only applies to the CalFresh Program.**

**Quality
Control
Impact**

Quality Control (QC) will cite the appropriate error when instructions in this material are not followed or are followed incorrectly. The key to avoiding errors is to document the determination.

**Director
Approval**

 Def. Dir. 9-30-13

Rick Wanne, MA, MFT
Eligibility Operations Director

DZ/mh