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**To:** Policy Learning Lab team from Children's Healthcare of Atlanta

**From:** Richard Sheward, Children's HealthWatch

**CC:** Kate Burke Blackburn, Nemours Children's Health System & Sara Bartel, ChangeLab Solutions

**Subject:** identification requirements at food banks

**Date:** August 9, 2018

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**Purpose:**

1. Targeted policy research and analysis to better understand what, if any, federal/state/local regulations require families to produce identification/documentation in order to receive food resources.
2. Connection to other teams/resources working with immigrant populations to increase access to food.

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**Report on regulations re: identification/documentation in order to receive food resources**

**[Advancing Equity within the Emergency Food Provider Network in Maricopa County](#)**

Note: While this report is specific to Arizona, the TEFAP regulations described and policy recommendations are applicable to other states, including Georgia.

***Policy on Identification Requirements***

Interviewees reported confusion surrounding identification requirements at food banks and pantries in Maricopa County. Arizona TEFAP distribution guidelines do require some form of identification, but it does not have to be government-issued. The guidelines state that any of the following are acceptable for identification purposes: driver's license, rent, utility, and phone bills, or a document that shows a client's name and address. The federal TEFAP guidelines prohibit requiring social security numbers. Although no one interviewed had been turned away, many relayed stories of others being turned away from food pantries for lacking U.S. state-issued identification cards. Others heard stories of agencies collecting social security numbers. Many interviewees that were not familiar with the food bank and pantry network did not know that requiring U.S. identification cards or social security numbers was prohibited. This finding indicates that many Latinos are not likely aware of their rights at food banks and pantries. It also indicates that some food pantries are not following TEFAP identification requirements.

***Recommendation: Training Staff and Volunteers***



The Emergency Food Assistance Program (TEFAP) Civil Rights training addresses the identification requirement barrier. The training curriculum states:

Customers must show an acceptable form of ID:

- TEFAP Card
- Driver's license
- Rent, utility, [or] phone bills
- Document that shows name and address
- You may not ask customers for a Social Security Number.

The research indicates that some frontline volunteers and staff are not aware of these requirements. Therefore, identification requirements should continue to be addressed in the TEFAP Civil Rights training.

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### **Fact Sheet on working with immigrant populations in the context of food banks/pantries**

- [Providing Food Assistance to Immigrant Communities in an Uncertain Political Environment](#)  
Shifts in the current administration have created uncertainty and confusion in many immigrant communities, leading individuals and families to become more hesitant in seeking resources and/or voluntarily withdraw from any resources they are currently accessing. In an effort to provide individuals and organizations more support, the San Diego Hunger Coalition has reached out to local and national immigration organizations to pull together information that can be shared with clients across food assistance programming.

***Recommendation: Inclusion of messaging information on food bank/pantry website. Examples:***

- [Vermont Foodbank](#)
- [San Francisco Marin Food Bank](#)
- Contact: [Marcia@sdhunger.org](mailto:Marcia@sdhunger.org)

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### **Case example: Working with state agencies to provide policy/regulation guidance to food banks re: identification/documentation in order to receive food resources**

In 2010, [Massachusetts Food SNAP Coalition](#) received complaints throughout the state that a number of local food pantries were requiring households to produce photo IDs as a condition of food distribution. The demand for a photo ID was affecting a wide range of low income persons - both U.S. citizens and immigrants alike - who lacked a photo ID due to homelessness, theft, domestic violence, fear of showing expired documents, or simply lack of any photo ID even though they had other forms of identification.

On behalf of concerned Food SNAP Coalition members, Massachusetts Law Reform Institute raised this issue with USDA and the Department of Elementary and Secondary Education and both attended a



Coalition meeting early in 2010 to discuss. DESE is the state agency that administers TEFAP funding. DESE has officially advised all of the food pantries that the practice of demanding photo IDs is prohibited. The [attached letter from DESE](#) was sent to the Greater Boston Food Bank, with identical letters sent to the Merrimack Valley Food Bank, the Worcester County Food Bank and the Food Bank of Western Mass.

**Recommendation:** If the inclusion of messaging/information/framing of the policy and regulations governing food banks/pantries, and/or or staff training is not successful, Children's Healthcare of Atlanta or a partner agency may consider approaching USDA and the Georgia state agency that administers TEFAP funding to request that policy guidance be issued to food banks/pantries in similar fashion to the guidance that took place in Massachusetts.