

ACDA ANNUAL CONFERENCE Coming Together to Nourish the Nation



April 21 - 24, 2024 **Marriott St. Louis Grand** St. Louis, Missouri



DONATION

Household 101



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Today's Speakers







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Texas Department of Agriculture

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Colorado Office of **Economic Security** Marcos Gaucin St. Mary's Food Bank







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Arizona Division of **Community Assistance** and Development

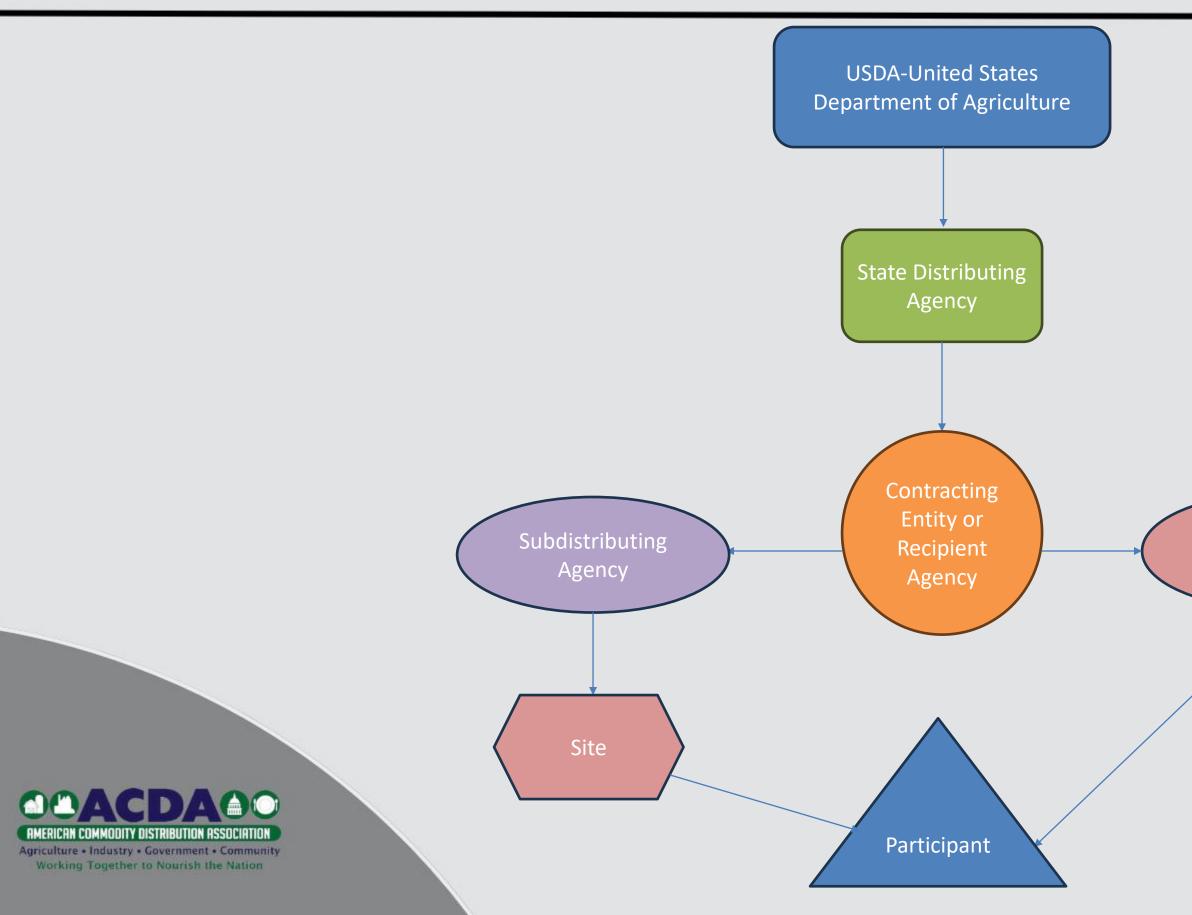
The Emergency Food Assistance Program (TEFAP)

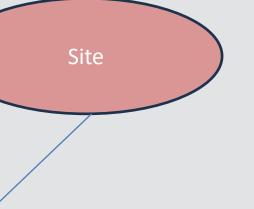


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TEFAP Structure









Definitions

- State Distributing Agency (SDA)- the agency designated by the State to administer TEFAP at the State level. Also referred to as the State or State Agency.
- Eligible Recipient Agency (ERA)- for the purposes of this presentation, this is an organization contracted with the State Agency to conduct TEFAP distributions. These are typically food banks.
- **Distribution Site** a location that distributes TEFAP foods to needy persons for household consumption or serve prepared meals to needy persons. These include all eligible recipient agencies including State-contracted ERAs, food pantries, soup kitchens and other emergency feeding organizations.



TEFAP Purpose

- TEFAP is a Federal program administered by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS).
- This program helps supplement the diets of low-income Americans by providing them with emergency assistance at no cost.
- The USDA purchases a variety of nutritious, high-quality USDA Foods, and makes those foods available to States. The amount of food each state receives out of the total food available is based on the number of unemployed persons and the number of people with incomes below the poverty level in the state.
- Foods are purchased by the State from USDA FNS and distributed as Emergency Food Packages and in meals served at Congregate Feeding Sites (Soup Kitchens).



Code of Federal Regulations (CFR)

- The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government
- TITLE 7 CFR, Subtitle B, Chapter II, Subchapters A & B, Parts §250 & §251 outline the program requirements for TEFAP.
- CFRs can be found at https://www.ecfr.gov/



TEFAP Funding

- The amount of funding provided by the USDA to each state is based on 60% of the number of persons in households within the state having incomes below the Federal poverty level and 40% of the number of unemployed persons within the state (7 CFR, §251.3)
- States must provide a cash or in-kind contribution equal to the amount of TEFAP administrative funds received from USDA and retained by the SA for State program costs, or made available to partners who are not Emergency Feeding Organizations.
- States are not required to match any portion of the federal grant passed through to Eligible Recipient Agencies (Food Banks).



Roles and Responsibilities-USDA Food and Nutrition Services

- The Food and Nutrition Services (FNS) Department shall have responsibility for the distribution of food commodities and allocation of funds under TITLE 7 CFR, Subtitle B, Chapter II, Subchapters A & B, Part §251.
- Each State Agency that distributes donated foods to eligible recipient agencies or receives payments for storage and distribution costs in accordance with § 251.8 must perform those functions pursuant to an agreement entered into with the Department. This agreement will be considered permanent, with amendments initiated by State agencies, or submitted by them at the Department's request, all of which will be subject to approval by the Department.



Roles and Responsibilities- State Agency

The State is responsible for administering TEFAP at the State level:

- Comply with civil rights requirements
- Complete and submitting State Plans to USDA/FNS
- Assign TEFAP distribution and allocating administrative funds to Eligible Recipient Agencies (ERAs)
- Select ERAs to administer TEFAP in local areas of the State
- Enter into required agreements with USDA and ERAs
- Order USDA foods for distribution (may be a State or Food Bank function)
- Provide guidance to LAs on all aspects of program operations, as needed
- Establish program eligibility requirements when the requirement is a State option
- Establish procedures for resolving complaints about commodities

Roles and Responsibilities- State Agency

The State is responsible for administering TEFAP at the State level:

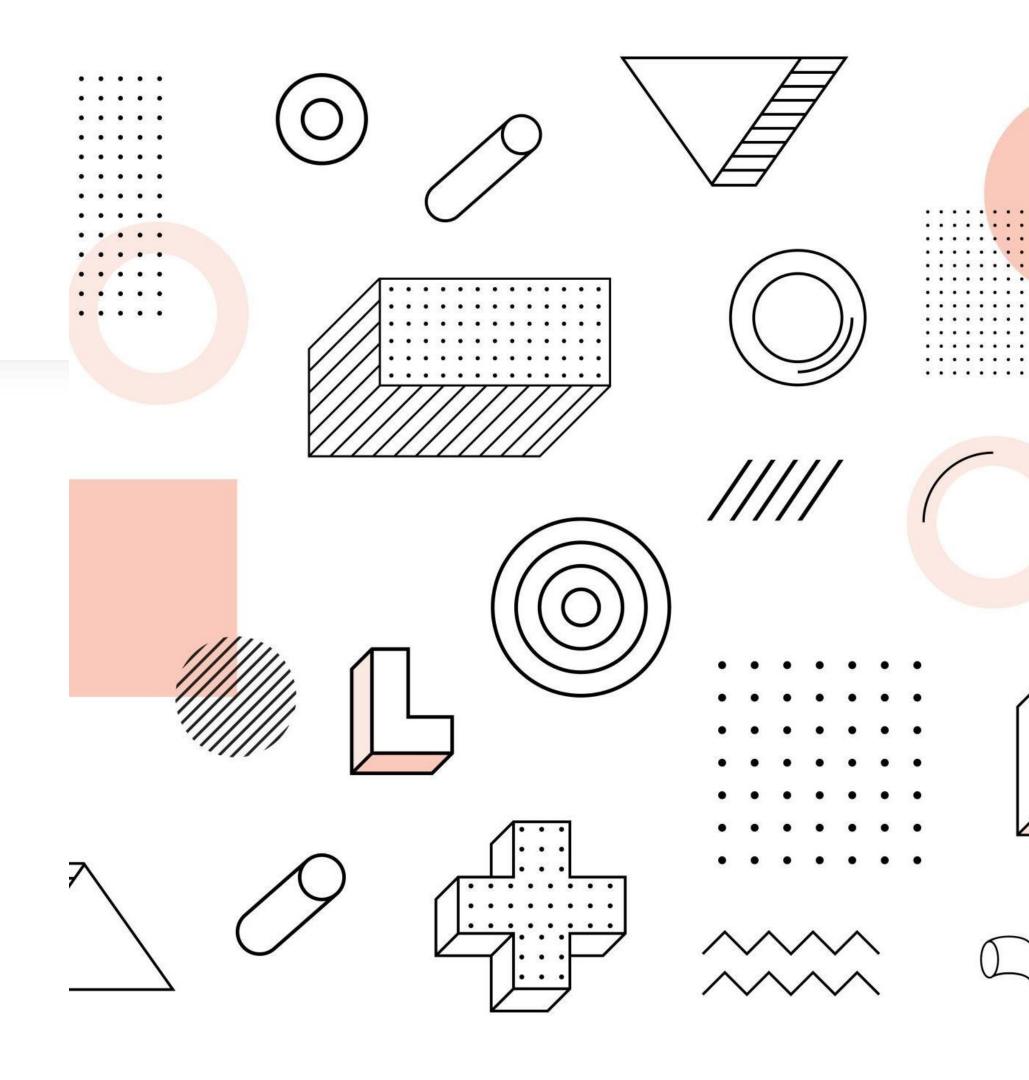
- Establish a management review system and conduct reviews ERAs
- Establish a financial management system that effectively accounts for funds received and distributed for program administration
- Establish standards for determining and pursuing claims against participants
- Ensuring compliance with Federal audit requirements
- Maintain accurate and complete records
- Conduct program outreach
- States can delegate certain functions to Eligible Recipient Agencies, However, the establishment of State options and the management review system, along with conducting reviews, must remain at the State level (7 CFR, §247.3(b)).



Roles and Responsibilities- Eligible Recipient Agency

Eligible Recipient Agencies are responsible for administering TEFAP at the local level.

- Enter into required agreements with the State
- Select and maintaining TEFAP agreements with Distribution Partners
- Comply with civil rights requirements
- Comply with Federal and State established fiscal and operational requirements
- Order USDA foods for distribution (may be a State or Food Bank function)
- Store commodities in accordance with all Federal, State and local food storage requirements



Roles and Responsibilities- Eligible Recipient Agency

Eligible Recipient Agencies are responsible for administering TEFAP at the local level.

- Certify applicants in accordance with Federal and State established program eligibility criteria
- Distribute TEFAP equitably
- Inform participants of their program rights and responsibilities
- Meet the special needs of homebound participants to the extent possible
- Establish internal procedures for resolving complaints about commodities
- Pursue claims against participants, as needed
- Maintain accurate and complete records
- Conduct program outreach



TEFAP Application

Eligible Recipient Agencies and **Distribution Sites**



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Eligible Recipient Agency Eligibility Requirements

- Is not a penal institution;
- the State;
- Falls into one of the following categories:
 - Emergency Feeding Organization (EFO)
 - Charitable institutions
 - service

 - Disaster relief programs (Final Rule, §250.13)

• Possesses tax-exempt status pursuant to Final Rule, §251.5;

• Provides food assistance exclusively to needy persons for household consumption, pursuant to a means test, or predominantly to needy persons in the form of prepared meals; • Has entered into an agreement with the State for the receipt of commodities and/or administrative funds, or receives commodities and/or administrative funds under an agreement with another Food Bank which has signed an agreement with

• Summer camps for children or child nutrition programs providing food

• Nutrition projects operating under the Older Americans Act of 1965

Eligible Recipient Agency Eligibility Requirements cont.

An eligible organization must also have:

- commodity receipt and distribution.
- A State-approved system to ensure that USDA procedures.
- applications for participation (7 CFR, §250.4)

• A State-approved inventory control and accountability system in place prior to handling USDA commodities which must be maintained continuously at all points of

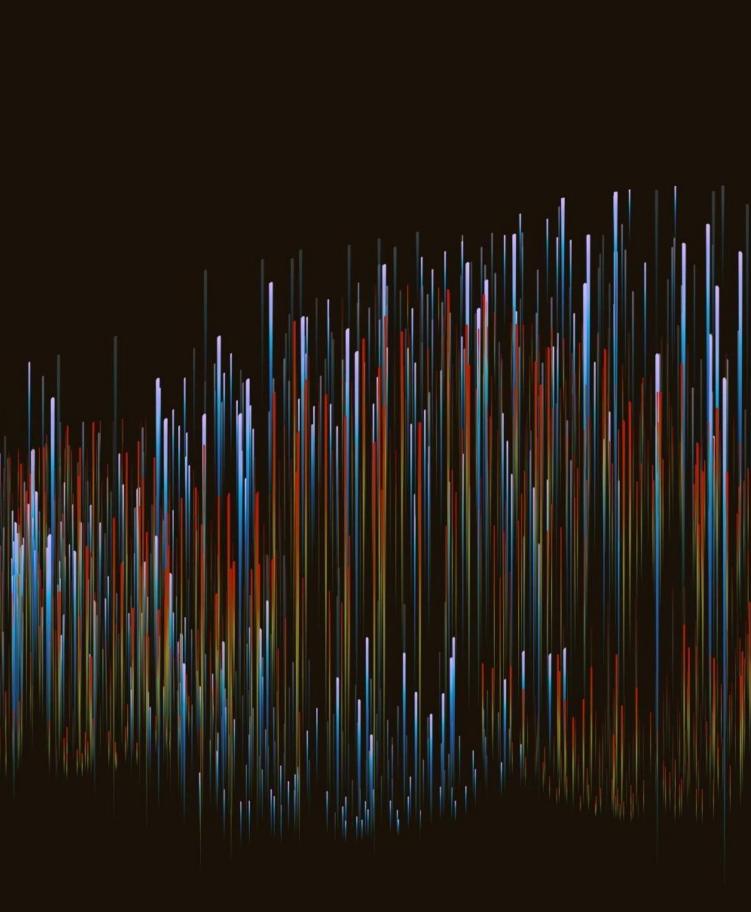
commodities are distributed in accordance with Federal and State TEFAP laws, regulations, policies and

• The State shall consider the past performance of potential eligible organizations when approving

• The State may impose additional requirements for participation that are not inconsistent with the provisions of Federal regulation (7 CFR, §250.4)

Distribution Site Eligibility Requirements

- Distribution Sites are also considered eligible organizations and must meet the same eligibility criteria as Eligible Recipient Agencies. (Final Rule, §251.3).
- Federal regulation allows the State to delegate to Eligible Recipient Agencies the authority to determine if organization meet federal and state criteria to receive commodities and administrative funds in order to become a Distribution Site. Eligible Recipient Agencies must ensure that their selected Distribution Sites meet the established criteria; however, they are not granted authority to establish eligibility criteria. (*Final Rule, §251.5*)



Agreements/Contracts

USDA and The State

In most states, TEFAP administration is the responsibility of the State which enters into an agreement with the USDA. As such, the State is designated as the State Agency responsible for entering into contractual relationships for the receiving, warehousing and distribution of TEFAP commodities (7 CFR, §241.2)

The State and Eligible Recipient Agencies

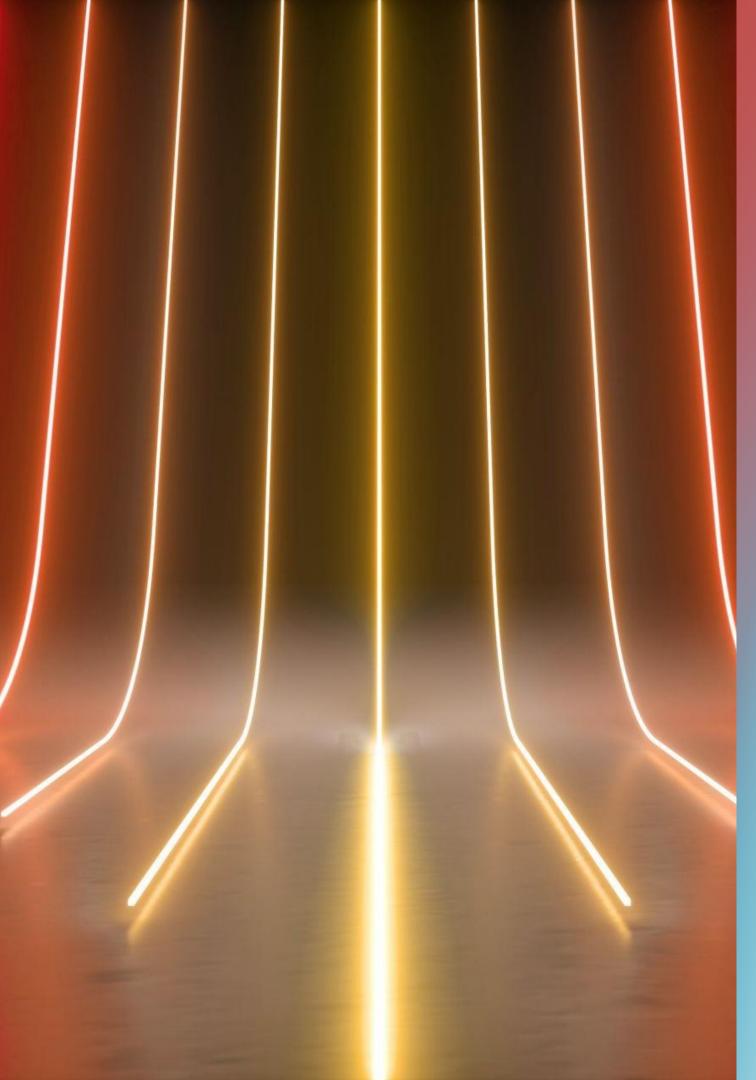
The State may establish agreements with Eligible Recipient Agencies to function as a distribution network for USDA foods. A formal agreement/contract authorizes them to receive and distribute TEFAP foods.

Eligible Recipient Agencies and Distribution Sites

Eligible Recipient Agencies that have a contract directly with the State are authorized to enter into agreements or contracts with other organizations to perform TEFAP functions. Eligible Recipient Agencies must have written agreements with their Distribution Sites before they may receive TEFAP food and/or administrative funds. (*Final Rule, §251.2*)



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Application Process- Eligible Recipient Agencies

Each State Agency has its own process for evaluating and selecting Eligible Recipient Agencies.

For more information on becoming an Eligible Recipient Agency, contact the State Agency that oversees TEFAP for your State.



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Application Process-Distribution Sites

Each State or Eligible Recipient Agency has its own process for evaluating and selecting Distribution Sites. Oftentimes, this is the responsibility of the Eligible Recipient Agency.

For more information on becoming a Distribution Site, contact the Eligible Recipient Agency that oversees TEFAP in your area.



Program Administration

- Training must be conducted for new CEs via different forums. CEs must then provide training to subagencies/sites.
 - Properly transporting, storing, handling, and using USDA Foods
 - Applying eligibility criteria for households
 - Following written application procedures
 - Ensuring client rights (including civil rights requirements)
 - Following complaint procedures
 - Processing household applications or requests for meals in the contracted service area
 - Assisting applicant households to complete their applications
 - Referring residents from other contracted service areas to locations where they may apply for USDA Foods

CEs must maintain a record of trainings and attendees for its program records.







Site Reviews/Monitoring

- CEs must monitor their administrative and site personnel and subagencies to make certain the following steps are taken:
 - -Ensure program compliance
 - Investigate reported problems
 - -Determine whether to operate a site during the following program year
 - -Verify and ensure proper use of USDA Foods











Food Assistance Program

Enrollment/Certification of Participants

- Public or private nonprofit organizations that provide nutrition assistance to low-income Americans either through the distribution of food for home use or the preparation of meals.
- Households that meet State eligibility criteria may receive food for home use. States set income standards.









Participation Rights and Responsibilities

Texas Department of Agriculture

> The Emergency Food Assistance Program (TEFAP) Participant Rights and Responsibilities

- 1. I will not be denied USDA Foods if I am determined eligible.
- 2. I certify that the information I have provided for eligibility determination is correct to the best of my knowledge.
- 3. I agree to report changes in household circumstances, including, but not limited to, income and household size.
- I understand that if I choose a proxy to pick up my food, that person must be listed as a proxy either 1) on my Household Application for USDA Foods or 2) in a written note on file with TEFAP staff.
- 5. I understand that the food provided by this program is intended for the members of the eligible household.
- 6. I understand that I must not sell or exchange the USDA Foods that my household receives.
- I consent to the release of information to TEFAP staff, which includes officials of the United States Department of Agriculture, Texas Department of Agriculture, and the food bank.
- 8. Program staff have advised me of my rights and responsibilities under this program.
- I understand that the standards for participation in this program are the same for everyone regardless of race, color, national origin, age, sex, or disability.
- 10. I have read this form, or the form has been read to me.
- 11. The site maintains the right to ensure orderly distribution.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g. Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling, (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

 mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; or

(2) fax: (833) 256-1665 or (3) email: program.intake@usda.gov. (202) 690-7442; or

This institution is an equal opportunity provider





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Inventory Management

- FNS Instruction 709-5 Shipment and Receipt of Foods -Prompt Payment Act / USDA Policy -SDA's have 48 hours from date of receipt to enter goods receipt into WBSCM
- FNS Instruction 410-1 Claims for Losses of Donated Foods and Related Administrative Losses
- Food Storage Facility Review
- ERA Priorities / USDA Food Allocation
- New Storage Site- states may review







Program Documentation/Reporting

Six-month inventory rule: —FNS-155 —Physical Inventory Counts



OMB FORM APPROVED NO 0584-0293 Expiration Date: 07/31/2023

INITED STATES DEPARTMENT OF AGRICULTURE - FOOD AND NUTRITION SERVICE

INVENTORY MANAGEMENT REGISTER

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the turden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research and Analysis (0584-0293), Alexandris, VA 22302. Do not return the completed form to this address.

LIST STATE INVENTORY(IES) GREATER THAN 6 MONTHS			
STATE AGENCY		DA CODE	
MONTHYEAR		•	
COMMODITY & CODE (1)	QUANTITY (CASES) (2)	DISPOSITION/COMMEN (3)	ITS
(4) EXCESS INVENTORIES TO REPORT	NO	(5) SIGNATURE/TITLE	(6) DATE
FORM FNS-155 (08-18) Previous Editions Obsolete SBU Electronic Form Version Designed in Adobe 11.0 Version PAGE OF			

Commodity Supplemental Food Program (CSFP)



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Definitions

- USDA-United States Department of Agriculture
- FNS-Food and Nutrition Service
- RO-Regional Office -MARO, MWRO, MPRO, NERO, SERO, SWRO, WRO
- CFR-Code of Federal Regulations
- CSFP-Commodity Supplemental Food Program
- WBSCM-Web-Based Supply Chain Management
- FPRS-Food Programs Reporting System
- SA-State Agency/Distributing Agency
- SDA-State Distributing Agency
- LA-Local Agency
- RA-Recipient Agency



Purpose

To improve the health of low-income older adults (60+) at no cost by supplementing their diets with USDA Foods.



Funding

- Farm Bills
- Appropriations
- Allocation & disbursement of funds -2022: \$7.04 per participant/month -2023: \$7.77 per participant/month





CSFP Regulations & Policy

- <u>Title 7 CFR 247</u>
- <u>Title 7 CFR 250</u>
- <u>FNS Policy Memorandums</u>
- State Plans
- State Policy & Procedure Manuals



Roles & Responsibilities

- USDA
- SDA-responsible for all aspects of program administration
- Subdistributing Agency-primarily distribute and store CSFP commodities and perform other functions on behalf of the SDA
- **RA**



Types of Agreements

- USDA→State Agency
- State Agency→Subdistributing Agency
- Subdistributing Agency→Recipient Agency



Eligibility Requirements

- Ability to operate program in accordance with Federal and State requirements
- Need for program implementation in the projected service area
- Available resources for program initiation



Recipient Agency Application Process

- Submit a written application to the State Agency
- Nonprofit agency must have tax-exempt status



Agreement Contents

- Assurance that agency will follow 7 CFR 250
- Assurance that agency will maintain records for 3 years plus the current year
- Statement that agency is responsible for any loss results from improper storage/handling of commodities
- Statement that agency is responsible for misuse of program funds
- Description of the specific functions being delegated to the agency
- Statement specifying either party may terminate the agreement by written notice

 Statement must specify minimum number of days of advance notice (must be at least 30 days)



lus the current year From improper storage/handling

Additional Agreement Contents

- Assurance that SDA will provide nutrition education to participants
- Assurance that SDA will provide participants information on other health, nutrition, and public assistance programs (and make referrals as appropriate)
- Assurance that SDA will distribute commodities in accordance with the approved food package guide rate
- Assurance that SDA will take steps to prevent and detect dual participation
- Assurance that the SDA will not subject any person to discrimination
- Names and addresses of all certification, distribution, and storage sites under the jurisdiction of the SDA



Program Structure

USDA

State Agency

Subrecipient Agency

Distribution Sites



Program Administration

State Agency

- State Plan
- Policy/Procedures
- Caseload allocation
- Ordering

Subrecipient Agency

- Compliance
- Inventory Management
- DS Agreements
- Training
- Record Keeping
- Nutrition Education
- Caseload Management
- Reporting



Distribution Sites

- Compliance
- Inventory Management
- Record Keeping
- Program Outreach
- Enrollment and Certification
- Distribution
- Notifications
- Reporting

Training Requirements

Training Provided to Agency Partners

- Annual Civil Rights
- Food Safety
- Eligibility and Enrollment
 - Recertification
 - Proxies
- Notifications
 - Notice of Action
 - Rights and Obligations
 - ID/Transfer Card
- Distribution Procedures
- Inventory Management (FIFO)
- Reporting (Monthly MIR)



Site Reviews/Monitoring

ADES Reviews of RFBs and DSs include...

- **Eligibility determinations**
- **Inventory Management**
 - Food ordering procedures
 - Storage and Warehousing
 - Inventory Controls
- Review and Approval of DSs
- Data collection, reporting, and recordkeeping
- Civil rights and nondiscrimination procedures
- **Program outreach**

Annual RFB Reviews of DSs include all the above PLUS

- Signage ("And Justice for All," ADA 504 Notice and Eligibility Guidelines)
- **Distribution** rates



Nutrition Education

RFBs must provide nutrition education that can be easily understood by participants and is related to their nutritional needs and household situations. RFBs must provide nutrition education that includes the following information, which should account for specific ethnic and cultural characteristics whenever possible (7 CFR, §247.18):

- ChooseMyPlate.gov
- USDA Nutrition.gov website
- USDA Mixing Bowl recipes, cookbooks and menus
- USDA Nutrition.gov website
- USDA SNAP-Ed Connection



Documentation/Reporting

Monthly

- Food Distribution Monthly Statistical Report
- FNS-153 Monthly Report of the CSFP and Qtrly. Admin. Financial Status Report •
- CSFP Monthly Inventory Report
- **Expenditures and Supporting documentation** •
- Corrective Action Plan Status or Completion Reports (as needed) Quarterly (Oct, Jan, Apr, July)
 - Recipient Agency List
- Annually
 - Current certificates of insurance
 - Nutrition Education Survey results and narrative •
 - FNS-191 Racial/Ethnic Group Participation (April data)



Documentation/Reporting

Monthly

CSFP Distribution Site MIR

Annually

- Annual USDA Commodity Food Service Application and Agreement
- Annual Civil Rights Training
- As Needed
 - Commodity Disposal Report
 - USDA Commodity Loss Report
 - Volunteer Confidentiality
 - Civil Rights Complaint / Grievance



Inventory/Ordering Considerations

Inventory Monitoring

- Inventory levels compared to caseload and distribution rates
- Annual Inventory (includes interim cycle counts)
- Communication with State Agency
- Distribute within 3 months

Inventory Management

- Receiving
- Inspection and Verification (Seal, Quantity, Quality)
- Record Keeping
- Disposal
- Recalls



Participant Enrollment/Certification

Certification

- Eligibility determination
- Documentation
- Proxies
- Notifications (Notice of Action, ID/Transfer Card, Participant Rights and Obligations, and Wait list)
- 12-month period

Recertification

- Recertification Notice
- Verify participant's info and continued interest
- Eligibility

Temporary Enrollment – 1 month

- Conditions:
 - Participant is unable to verify their address
 - Waitlisted participant is eligible to receive a temporary (1 time) distribution



Caseload Management

Caseload allocation and monitoring

- Each year, FNS assigns a caseload to each State agency to allow persons meeting the eligibility criteria listed under §247.9 to participate in the program, up to the caseload limit.
- Monthly monitoring
 - Distribution rates •
 - Distribution frequency •
 - Waitlist •
 - Reporting (client lists, inventory) •
- Reassign caseload if necessary



Other Program Requirements



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Financial Management



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Financial Controls

- Internal controls that ensure the RA (2 CFR § 200.303): •
 - Manages programs in compliance with federal statutes, federal regulations, state rules, policies, and guidance.
 - **Complies** with federal statutes, federal regulations, state rules, policies, and guidance.
 - Evaluates and monitors its compliance with federal statutes, federal regulations, state rules, policies, and guidance.
 - Takes prompt action when instances of noncompliance are identified, including noncompliance identified in audit findings.
 - Safeguards to protect personally identifiable and other information.
- Written procedures lacksquare
- Disclose and identify any conflicts of interest. lacksquare
 - Less-than-arm's-length transactions



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Procurement

- The process of acquiring goods and services in a manner that allows for full and open competition.
- The procurement process is a multi-step approach: •
 - Writing procurement procedures
 - Forecasting quantities needed/Scheduling when quantities are needed
 - Selecting the proper procurement method
 - Developing a solicitation
 - Advertising the solicitation
 - Evaluating proposals and offers
 - Awarding the contract
 - Managing the contract



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Procurement Methods

- RA/SDA must use the appropriate procurement method depending on the cost of the good(s) or service(s) they need to procure. The procurement methods a RA/SDA must use when procuring goods and services are discussed and include:
 - Informal Procurement Methods = up \$250,000
 - Micro-purchase = up to \$10,000
 - Small Purchase < \$10,000
 - Formal Procurement Methods < \$250,000
 - Competitive sealed bids (Invitation for Bid (IFB))
 - Competitive proposals (Request for Proposal (RFP)
 - Noncompetitive Procurement Methods
 - Inadequate Competition
 - Sole Source
 - Public Emergency or Unexpected Emergency Situation



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Administrative Costs

- Allowable costs associated with the programs must be:
 - Reasonable and Necessary
 - Allocable
 - Consistent
- Unallowable costs include (not an exclusive list):
 - Costs not associated to program business
 - Bad debt
 - Costs related to obtaining donations
 - Entertainment
 - Fines/penalties
 - Fundraising
 - Political or legislative expenses
 - Personal expenses



Civil Rights



In the same line

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Title VI of the Civil Rights Act of 1964

- All nutrition assistance programs and activities that receive Federal funding are protected and subject to civil rights oversight. Recipient Agencies (RA) are responsible for ensuring that all qualifying persons have equal access to The Emergency Food Assistance Program (TEFAP) and Commodity Supplemental Food Program (CFSP) by complying with the civil rights and nondiscrimination requirements of the U.S. Department of Agriculture (USDA). (7 CFR §251.10(c))
- Protected bases in the USDA nutrition assistance programs are: \bullet
 - Race
 - \circ Color
 - National origin
 - Sex (including gender identity and sexual orientation)
 - Age
 - Disability



Title VI of the Civil Rights Act of 1964

- Public Notification
 - And Justice for All Posters
 - Nondiscrimination Statement
- Collection of Racial Ethic Data
- Limited English Proficiency
- Administrative Reviews



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Section 504 of the Rehabilitation Act of 1973

- Program Accessibility
- Public Notification
- Employment
- Designation of Section 504 Coordinator
- Complaint and Grievance Procedures
- Self-Evaluation of Services



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Americans with Disabilities Act

- The ADA applies to all persons and is not limited solely to persons who receive federal financial participation. It • comprises of non-discriminatory practices and reasonable accommodations for services and employment.
- Services:
 - Can a person with disabilities get to the facility with reasonable ease?
 - If the person can reach the location, can they enter the facility and access the specific location where services are provided?
 - If they can access the location where services are provided, is there an accessible bathroom?
 - If they can access the location where services are provided, are necessary accommodations made for their particular disability?
- **Employment:**
 - Must not discriminate against a person with a disability when hiring or promoting staff if the person is otherwise qualified for the job
 - May inquire about a person's ability to perform a job, but cannot ask whether a person has a disability nor subject a person to tests that screen out people with disabilities
 - Must provide "reasonable accommodations" to persons with disabilities, e.g., job restructuring and modification of equipment



Complaints

- SDAs and RAs must have written grievance procedures for addressing and processing complaints. Administrative and site personnel must be able to provide documentation of the procedures and an explanation of the complaint process.
- Civil Rights Complaints Any person or representative alleging discrimination based on a prohibited basis has the • right to file a complaint within 180 days of the alleged discriminatory action. Civil rights complaints must be forwarded to USDA immediately.



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Civil Rights Training

- SDA and RA personnel must be trained in all aspects of civil rights before assuming any program duty and in every program year thereafter. This includes volunteers who regularly interact with participants, determine eligibility and/or handle the personal information of applicants and participants must also receive full training.
- Volunteers who do not handle personal information and only infrequently interact with participants must receive limited civil rights training (i.e., customer service and any other subject matter applicable to each volunteer's role and responsibilities).
- Volunteers who do not interact in any way with TEFAP applicants and participants and who do not handle personal information do not need civil rights training.
- volunteer that cannot understand and/or abide by the training and civil rights requirements should not interact with participants or handle personal information.



Administrative Reviews



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Purpose of a review



The information collected during a review gives USDA the ability to ensure programs comply with federal program regulations and policies while allowing the state agencies to administer programs that align with their local preferences.

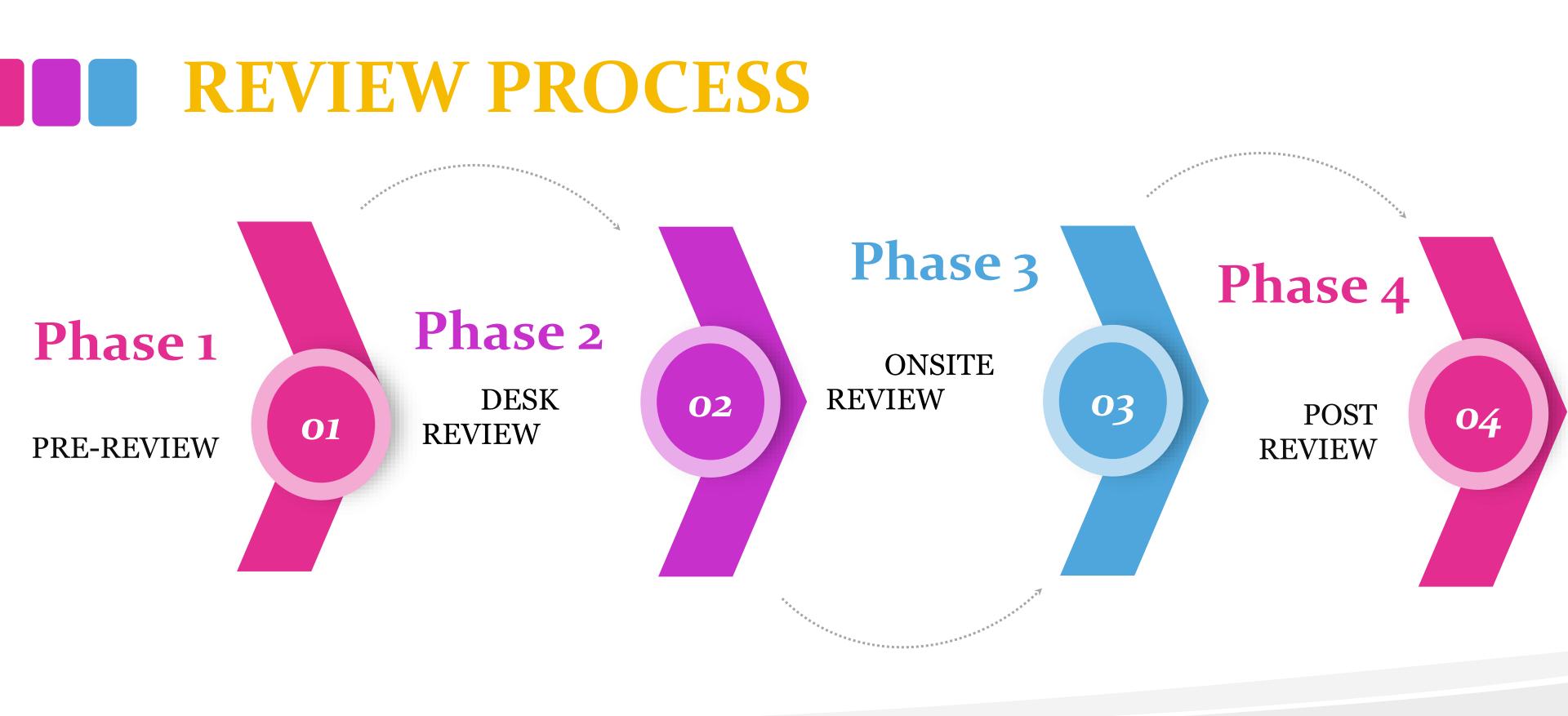
Administrative Review Frequency

CSFP Reviews are conducted for each RA once every 2 years.

SDAs must review at least 25% of TEFAP RAS annually, and no less than once every three years.

TEFAP Site Selection

State agencies are required to review at least one-tenth or 20, whichever is fewer, of all RAs that receive TEFAP foods and/or administrative funds.



Phase 1

PRE-REVIEW



PRE-REVIEW: PLANNING

The SDA will prepare and set up for the scheduled administrative Review.

- reviewed
- Prepare travel arrangements
- Plan dates with the RA.

• Determine which sites will be

• Create a schedule for the review

Phase 2 Desk Review



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Purpose of a Desk Review



The Desk Review covers questions from the administrative review that can be answered by reviewing documents submitted by the RA.



This is completed at the SDA office itself instead of onsite.

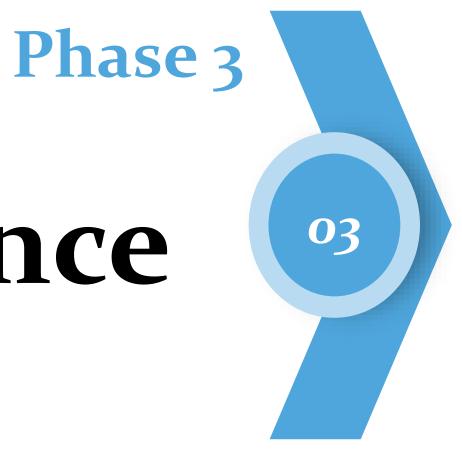


The desk review is designed to **decrease the amount of time needed for the on-site** portion of the review.



Establishes deadlines for the RA to submit desk review documentation.

Onsite Conference



Onsite Review



While at the RA premises, the SDA will observe program processes and documentation to determine compliance with federal, state and local requirements.



SDA observations and determinations are documented in a state developed review tool.



Observations and preliminary review determinations are discussed with the RA.

Phase 4

Post Review



Corrective Action and Close out



The SDA will request a corrective action plan for any findings noted during the administrative review.



Corrective action responses and documentation submitted by the RA will be reviewed by the SDA to identify if actions have permanently corrected each finding.

Once corrective actions have been approved by the SDA, fiscal action can be assessed and applied as appropriate.



An Administrative Review close out letter is issued to the RA indicating the AR is completed.

Disaster Policies and Procedures



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Disaster Policies and Procedures

- The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) coordinates with state, local, and voluntary organizations to accomplish the following goals:
 - 1. Provide food for shelters and other mass feeding sites
 - 2. Distribute food packages directly to households in need in limited situations
 - 3. Issue Disaster Supplemental Nutrition Assistance Program (D-SNAP)benefits





Types of Disasters

- Disaster A Presidentially-Declared Disaster or emergency that results in USDA Foods assistance (and other federal • assistance) for eligible people because of the disaster or emergency.
- Situation of distress A natural catastrophe or another event that does not meet the definition of disaster as defined above, but that the SDA or USDA determines warrants the distribution of USDA Foods to assist survivors. Examples include, but are not limited to, a hurricane, flood, snowstorm, or explosion.







Disaster Household Distribution (DHD) Program

- Designed to provide food assistance in disasters through USDA Foods that are typically distribute through TEFAP.
 State agencies will contact the CEs when DHD is implemented.
 - Congregate Meals-Current USDA Foods inventories are often used for mass feeding. These foods are typically supplied by the State agency to disaster relief organizations to provide meals for those in need.
 - Households-With formal FNS approval, States can distribute packages of USDA Foods intended for household distribution programs, such as The Emergency Food Assistance Program (TEFAP), directly to households in need. Disaster organizations may request USDA Foods through State agencies.
- States must track the use of these foods and provide a report to USDA. USDA does not set aside or pre-position food specifically for disasters.





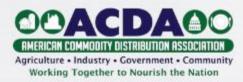


QUESTIONS?

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