



**Department of
Job & Family
Services**

**Commodity Supplemental Food Program (CSFP)
Policies and Procedures Manual**

**Ohio Department of Job & Family Services
Office of Family Assistance**

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Section 1 Introduction

Purpose of Manual

The Food Programs Manual is provided by the Ohio Department of Job & Family Services (ODJFS) to clarify program procedures for Local Agencies participating in the Commodity Supplemental Food Program (CSFP). The intent of this manual is to establish and maintain a consistent statewide minimum level of service for the distribution of CSFP food packages. The manual provides the framework for acceptable compliance to program guidelines established by ODJFS and the United States Department of Agriculture (USDA) federal program regulations found at 7 Code of Federal Regulations (CFR) 247 and 250 for CSFP.

Contents of Manual

The manual contains information about the rules, regulations, reports and forms for CSFP incorporated into agreements with program providers. The manual includes a Table of Contents and program terms, definitions and acronyms. Updates to the manual may be made periodically. The 2025 revision affects the entire Food Programs Manual. Please discard all previous versions and updates.

Section 2

Definitions

The following is a list of federal, state, and local terms, acronyms and definitions used throughout the manual for the program administration in Ohio.

Agricultural Marketing Service

USDA Agency responsible for purchasing food products such as meat, poultry, fruits and vegetables.

Applicant

Any person who applies in writing, electronically, verbally, or through a designated representative for participation to receive program benefits. Applicants include program participants applying for recertification.

Bill of Lading (BOL)

Documentation of the contents of a shipment and other pertinent information as required in the contract of carriage.

Carrier

Commercial enterprise that transports USDA foods from one location to another but does not store such foods.

Caseload

The monthly average number of persons a state agency is authorized by FNS to serve over a specified period of time by the CSFP. Caseload is allocated to participating foodbanks by ODJFS.

Caseload Cycle

The period from January 1 through the following December 31.

Certification Period

The period of time that a CSFP participant may continue to receive program benefits without a review of his or her eligibility.

Code of Federal Regulations (CFR)

Contains the regulations governing all federal programs. Regulations for CSFP are found at 7 CFR 247 and 7 CFR 250, as applicable.

USDA Foods

Food donated by USDA for distribution through CSFP.

Commodity Supplemental Food Program (CSFP)

CSFP is a federal nutrition assistance program that provides low-income, individuals at least 60 years of age with a monthly box of food. It includes a variety of foods, such as cheese; nonfat dry and Ultra High Temperature (UHT) milk; juice; oats and ready-to eat cereal; rice and pasta; peanut butter; dry beans; canned meat, poultry or fish; and canned fruits and vegetables.

Cooperative Extension Office

The Cooperative Extension Office system is a nationwide, non-credit educational network. Each U.S. state and territory has a state office at its land-grant university and a network of local or regional offices. These offices are staffed by one or more experts who provide useful, practical, and research-based information to agricultural producers, small business owners, youth, consumers, and others in rural areas and communities of all sizes. Ohio State University Extension connects Ohio State to the people in all 88 Ohio counties. Visit <http://extension.osu.edu/lao#county> to find a local county Extension office.

Disqualification

The act of ending Program participation of a participant as a punitive sanction.

Dual Participation

The simultaneous participation by an individual in CSFP at more than one distribution site.

Federal Programs Reporting System (FPRS)

The internet based online reporting system for federal programs.

Fiscal Year (FY)

A twelve-month period used for accounting and reporting purposes.

Food and Nutrition Service (FNS)

An agency of USDA responsible for the nationwide administration of several federal nutrition programs which includes CSFP.

Foodbank

A public or charitable organization that maintains an established operation involving the provision of food to food pantries, soup kitchens, hunger relief centers, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to feed needy persons on a regular basis.

Food Pantry

A public or private nonprofit organization that is a part of a foodbank network that distributes food to low-income households, including food from sources other than USDA, to relieve situations of emergency and distress.

Food Programs Reporting System (FPRS)

FPRS is a web-based national reporting system used by State agency program administrators to submit data to USDA/FNS.

Homeless Shelter

A facility where the primary purpose is to provide temporary or transitional shelter for homeless individuals and families in general or for specific group populations (i.e. battered women, run-away youth) of homeless individuals and families.

Household

A single individual or a group of related or non-related individuals, who are living as one economic unit, exclusive of boarders, who are not residents of an institution and for whom food is customarily purchased and prepared in common.

In-Kind Replacement

The replacement of a loss of USDA Foods with a quantity of the same foods of U.S. origin that are of equal or better quality than the lost foods and that are of at least equal monetary value to the USDA's cost of replacing the lost foods.

Limited English Proficiency (LEP)

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Local Agency

A public or private nonprofit agency, which enters into an agreement with the State agency to administer CSFP at the local level.

Local Distributor

A private or public nonprofit organization, which contracts with a Local Agency to distribute CSFP food packages to eligible participants.

Midwest Regional Office (MWRO)

USDA/FNS Region IV, headquartered in Chicago, Illinois, responsible for USDA programs in Illinois, Indiana, Iowa, Michigan, Minnesota, Ohio and Wisconsin.

Multi-Food Shipment

A shipment from a National Multi-Food Warehouse that typically includes more than one type of USDA Food.

National Multi-Food Warehouse

A Federally contracted storage facility that includes more than one type of USDA Food.

Network

Foodbank member agencies responsible for the provision of emergency and supplemental food services.

Office Family Assistance (OFA)

The office within ODJFS which administers federal and state food assistance programs.

Ohio Department of Job & Family Services (ODJFS)

The state agency which develops and oversees programs that provide employment and economic assistance, child support and services to families and children. The programs and services offered are designed to help Ohioans be healthy and safe, while gaining and maintaining independence, and are delivered at the local level in a manner that recognizes and preserves individual rights, responsibilities, and dignity.

Poverty Guidelines

Established by the United States Department of Health and Human Services as an indicator of poverty based on income and utilized in establishing income-based eligibility standards for program participants. The guidelines are updated annually.

Proxy

Any person authorized in writing by a recipient to obtain USDA Foods on behalf of the recipient.

Regional Plan

A document, submitted annually to ODJFS by a Local Agency, which details the administration of CSFP.

Senior Farmers' Market Nutrition Program (SFMNP)

Program is designed to provide low-income seniors with access to locally grown fruits, vegetables, honey and herbs.

Service Region

An area of the state, determined by ODJFS, served by a Local Agency.

State Fiscal Year (SFY)

A twelve-month period used for accounting and reporting purposes, July 1 through June 30.

Technology-Based Client Eligibility Process

A client eligibility and delivery documentation method that utilizes a web-based or electronic process resulting in a paperless eligibility and record keeping system.

United States Department of Agriculture (USDA)

Cabinet level agency responsible for federal programs related to agriculture.

USDA Foods

Nutritious foods purchased by USDA to supplement the diets of CSFP participants, also referred to as donated foods.

Vendor

A commercial food company from which USDA purchases food for donation.

Web Based Supply Chain Management (WBSCM)

WBSCM is an integrated, food ordering, tracking and procurement system used by USDA and its customers, vendors, suppliers, and transportation personnel. All federal food and commodity orders, solicitations, offers, awards, deliveries, invoices, and payments occur in WBSCM, and all business partners in the commodity program are required to use this system.

Program Description

CSFP is a Federal program administered by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS). This program works to improve the health of low-income persons at least 60 years of age by supplementing their diets with nutritious USDA Foods. CSFP food packages do not provide a complete diet, but rather are good sources of the nutrients typically lacking in the diets of low-income senior persons. CSFP is authorized under Section 4(a) of the Agriculture and Consumer Protection Act of 1973. It is administered at the Federal level by FNS.

State Administration

ODJFS has been designated as the state agency responsible for the administration of CSFP. CSFP is housed within the Food Programs section of the Office of Family Assistance under the Ohio Department of Job and Family Services. ODJFS enters into grant agreements with regional foodbanks for local level administration of the program.

State Plan

The State Plan describes how ODJFS will operate CSFP and the caseload needed to serve participants. ODJFS develops the State Plan and submits it to the USDA/FNS for approval. Approved State Plans are considered permanent (i.e., a new plan is not required to be submitted each year). The plan must be approved prior to Federal assignment of caseload or distribution of administrative funds. Plan approval does not guarantee that USDA/FNS will provide caseload or funding. When changes to the Plan are required, ODJFS will submit Plan amendments to USDA/FNS.

Program Administration Responsibilities

ODJFS is responsible for administering CSFP at the State level. ODJFS is also responsible for:

- Completing and submitting the State Plan to FNS.
- Selecting Local Agencies to administer the program in local areas of the State.
- Determining CSFP caseload needs and submitting caseload requests to FNS.
- Assigning CSFP distribution and caseload and allocating administrative funds to Local Agencies.
- Establishing eligibility requirements, in accordance with the options provided to the State agency under 7 CFR 247.9.
- Entering into required agreements.
- Developing a management review system and conducting reviews of Local Agencies.
- Providing guidance to Local Agencies, as needed.
- Ensuring that program participation does not exceed the State agency's caseload allocation on an average monthly basis.
- Making publicly available a list of all CSFP Local Agencies on a publicly available internet web page. ODJFS must post the name, address, and telephone number for each Local Agency. The list must be updated, at a minimum, on an annual basis.
- Posting the State Plan that is currently in use on a publicly available internet web page.

Local Administration Responsibilities

For program purposes, Ohio's eighty-eight counties are divided into thirteen regions for CSFP of varying sizes. A foodbank within each region is designated as a Local Agency responsible for the administration of the program within the service region.

In accordance with 7 CFR 247.7, for Local Agencies to participate in CSFP must submit a written application to the State agency. The application must describe how the Local Agency will operate the program and must include the agency's tax-exempt status. Along with having a need for the program within the agency's projected service delivery area, the Local Agency must have the organizational capacity, including available staffing, to initiate and operate the program in accordance with federal and state requirements.

Local Agencies are responsible for administering CSFP at the local level. For Local Agencies, this may include selecting and entering into CSFP agreements with Local Distributors. Local Agencies are also responsible for:

- Determining eligibility of applicants in accordance with eligibility criteria established by ODJFS.
- Complying with fiscal and operational requirements established by the ODJFS.
- Ensuring that participation does not exceed the caseload assigned by the ODJFS.
- Complying with civil rights requirements.
- Informing applicants of their rights and responsibilities in the program.
- Issuing foods to participants in accordance with the established food package guide rates.
- Providing nutrition education and information on the availability of other nutrition and health assistance programs to participants.
- Meeting the special needs of homebound participants, to the extent possible.
- Pursuing claims against participants.
- Storing USDA Foods in accordance with all Federal, State and local food storage requirements.

Agreement Between the State and Local Agency

Agreements must contain the following assurances under paragraph (b) and (c) of 7 CFR 247.4:

- An assurance that the Local Agency will maintain accurate and complete records for a period of three years from the close of the fiscal year to which they pertain, or longer if the records are related to unresolved claims actions, audits, or investigations.
- A statement that the Local Agency receiving USDA Foods for distribution is responsible for any loss resulting from improper distribution, or improper storage, care, or handling of USDA Foods.
- A statement that the Local Agency receiving program funds is responsible for any misuse of program funds.
- An assurance that the Local Agency will provide, or cause to be provided, nutrition education to participants, as required in 7 CFR 247.18.
- An assurance that the Local Agency will provide information to participants on other health, nutrition, and public assistance programs, and make referrals as appropriate, as required in 7 CFR 247.14.

- An assurance that the local agency will distribute USDA Foods in accordance with the approved food package guide rate.
- An assurance that the Local Agency will take steps to prevent and detect dual participation, as required in 7 CFR 247.19.
- The names and addresses of all certification, distribution, and storage sites under the jurisdiction of the Local Agency.
- An assurance that the Local Agency will not subject any person to discrimination under the program on the grounds of race, color, national origin, age, sex, or disability.

Termination of Agreement Between the State and Local Agency

- ODJFS may terminate, or be required to terminate, a Local Agency agreement/contract in whole or in part, if it does not comply with Federal and State requirements. ODJFS will notify the Local Agency in writing of the termination, the reasons for the action, and the effective date, and must provide the Local Agency with an opportunity to appeal, in accordance with 7 CFR 247.35.
- The Local Agency may terminate the program, in whole or in part, upon written notification to ODJFS, stating the reasons and effective date of the action. In accordance with 7 CFR 247.4(b)(6), which relates to the termination of agreements, either party must provide, at minimum, 30 days' written notice.
- The Local Agency's program may also be terminated, in whole or in part, if both ODJFS and the Local Agency agree that the action would be in the best interest of the program. The two parties must agree upon the conditions of the termination, including the effective date.

Agreement Between Local Agency and Local Distributor

Agreements must contain the following assurances under paragraph (b) and (c) of 7 CFR 247.4:

An assurance that the Local Distributor will administer CSFP in accordance with the provisions of 7 CFR 247 and 250 unless the provisions of 7 CFR 250 are inconsistent with 7 CFR 247. Should inconsistency arise, 7 CFR 247 will be considered the final legal authority for CSFP.

- An assurance that each party to the agreement will maintain accurate and complete records for a period of five years from the close of the fiscal year to which they pertain, or longer if the records are related to unresolved claims actions, audits, or investigations
- A statement that the Local Distributor receiving CSFP food packages for distribution is responsible for any loss resulting from improper distribution, storage, care of handling the CSFP boxes.
- A statement that each Local Distributor receiving program funds is responsible for any misuse of program funds, if applicable.
- A description of the specific functions delegated from the Local Agency to the Local Distributor.
- A statement specifying that either party may terminate the agreement by written notice and the minimum number of days of advance notice of termination must be given. The advanced notification period must be no less than thirty (30) calendar days.

Local Distributor Selection

Before operating CSFP at a site where CSFP food packages will be distributed and stored (if applicable), the Local Agency must conduct an onsite visit to verify the site's ability to operate in full compliance with the requirements of the agreement it holds. When selecting CSFP sites, Local Agencies must evaluate the administrative cost and ability of the site to operate CSFP. Execute agreement between the Local Agency and Site which duties may include determining the eligibility of applicants, delivery of CSFP food packages or the distribution. Notify ODJFS of the new site by submitting an amended Site Information.

Local agencies must train sites to properly handle and store the CSFP food packages. At distribution sites, the Local agency must plan for and instruct the site coordinator on the proper handling of CSFP food packages when a participant is unavailable. If CSFP packages remain after a distribution, Local Agencies must ensure that the USDA food package is either:

- Returned to the Local Agency; or
- Stored properly at the site according to the terms and conditions of the agreement it holds.

Local Distributor Site List

Local Agencies must maintain a complete list of all CSFP distribution sites. During the program year, Local Agencies must revisit each site to monitor program operations and verify compliance with program requirements according to the CSFP Agreement Between the Contracting Entity and Site.

Violations by Local Distributors

Negligence is misuse or improper distribution of CSFP food packages or failure to properly store, handle, or care for the food.

A Local Agency must immediately report suspected fraud or misuse of CSFP foods to Food Programs staff. Include information related to the amount of CSFP foods involved; location of the incident; suspected parties; and other details and facts.

Local Agencies must initiate and pursue claims against any entity that misuses USDA Foods in CSFP.

Review Requirements of IRS Revocation of Tax-Exempt Status

Local Agencies that have contract agreements with a Local Distributor shall review, at least annually, the IRS Automatic Revocation of Exemption List to ensure that its member agencies do not appear on the revocation listing. Documentation of the review shall be retained on file. The Local Agency must determine what is considered acceptable documentation for this review.

The list is found at: <https://www.irs.gov/charities-non-profits/automatic-revocation-of-exemption-list>. For further information, refer to Policy Memorandum FD-118 "Automatic Revocation of Tax Exempt Status".

Distribution Site Termination

When requesting a site termination, the following must be detailed:

- Reason for termination.
- How and when participants will be notified (30-days is preferred)
- When the last day of distribution will be.
- Where clients will be able to get food going forward.
- How the remaining inventory will be retrieved (if applicable).

Sites Located at Religious Organizations

CSFP distributions can involve several different organizations. For instance, some religious organizations administer a site, while other religious sites provide space for CSFP without administering the program itself. Federal civil rights laws address explicitly religious activities at such sites:

- Organizations must not engage in explicitly religious activities as part of CSFP, including overt religious content such as worship, religious instruction, or proselytization.
- An explicitly religious activity at a site must be separated in time or location from CSFP services.
- Organizations must not require participants or applicants to participate in explicitly religious activities to receive CSFP.

CSFP and Explicitly Religious Activities

The following table provides examples to guide explicitly religious activities at CSFP sites.

It is acceptable to:	It is unacceptable to:
Hang a cross on a wall at the CSFP site.	Require participants to stand by a cross and recite a prayer before CSFP distribution.
Place a menorah on a table at the site during the holiday season.	Refuse CSFP food packages to participants who do not practice the Jewish faith.
Display faith-based pamphlets at the front or back of the site for interested people.	Insert faith-based pamphlets into CSFP boxes that will be distributed to participants.

Federal Caseload Allocation to States

CSFP Allocation

CSFP allocation is based on caseload assignment as established annually by USDA/FNS. State agencies order product required to meet the prescribed amount of food contained in the monthly food box. Orders are placed for direct shipment and/or multi-food shipment.

FNS allocates caseload slots to state agencies each year. The number of slots allocated is based on the program's funding level and available resources. For example, in 2024, FNS allocated a total of 730,000 slots for the caseload cycle. CSFP is a discretionary program, meaning Congress determines its annual funding level. The program can only serve as many eligible participants as the funding allows.

ODJFS Caseload Allocation to Local Agency

ODJFS assigns CSFP caseload to a Local Agency, who in turn, determines the allocation of caseload throughout the service region. A Local Agency determines the method of distribution to program participants, either through a Local Distributor or by direct service by the Local Agency. Food orders are placed for either direct or multi-food shipments. Direct shipments are single product loads. Multi-food shipments are single trucks containing a variety of food items. Orders are placed based on the amount needed to serve caseload. A Local Agency should maintain between a two and two and one-half month supply of CSFP foods.

State Agency Program Monitoring

ODJFS is responsible for on-site monitoring of Local Agencies and Local Distributors. The purpose of the monitoring process is to evaluate program operations. ODJFS has established a management review system to ensure that all agencies conducting CSFP program activities meet program requirements and objectives. The process is to include, but not be limited to, a review of:

- Eligibility determination process including a review of Local Agency procedures and controls to ensure that distribution sites are complying with eligibility guidelines and notifications, if applicable.
- Food ordering procedures.
- Warehousing and storage facilities.
- Inventory control including review of perpetual inventory records, records of issuance to and return from distribution sites, physical inventory counts.
- Distribution and transportation.
- Approval of Local Distributors (member agencies) to ensure proper and equitable selection of sites in order to meet the needs of the population.
- Network training and monitoring.
- Reporting and record keeping requirements.
- USDA Foods loss procedures.
- Civil rights and nondiscrimination compliance.

The review should be used to provide technical assistance for program improvement. The monitoring visit also provides an opportunity for the participating agency to ask questions, discuss concerns and make suggestions about the program. ODJFS will comply with federal program regulations set forth in 7 CFR 247.34 when determining the number of reviews conducted annually at participating agencies.

ODJFS will issue a report of review findings detailing recommended and/or required corrective action to the participating agency. The participating agency will have forty-five days to respond to the findings and document compliance with corrective action.

Deficiencies

When a deficiency is found, ODJFS must record all issues identified during the review and institute follow-up procedures to ensure that Local Agencies or Local Distributors correct all deficiencies within a reasonable period of time. To ensure improved program performance in the future, ODJFS may require that Local Agencies adopt specific review procedures for use in reviewing their own operations and those of contractors.

Training and Technical Assistance

The ODJFS Food Programs staff are available to provide training and technical assistance to a Local Agency or Local Distributor throughout the year upon request.

ODJFS is required to provide annual Civil Rights training for Local Agencies in accordance with FNS Instruction 113-1. Local Agencies are responsible for participating in the annual training and training their Local Distributors and front-line staff who interact with program applicants or participants.

Local Agencies must maintain a record of trainings and attendees (sign-in sheets) which includes the following:

- Date of training,
- Training topics, and
- Name(s) and signature(s) of attendees.

Training should be ongoing between a Local Agency and a Local Distributor. Policy changes, updated eligibility guidelines, federal and/or state regulation amendments, or any other pertinent information should be forwarded to each of the Local Distributors within the Local Agency's service region.

Cooperative Extension Offices are a good training resource for all participating agencies. The Cooperative Extension Office staff can provide training on health and safety procedures, instructions on the use of USDA food products and other pantry items in food preparation, and recipes and nutritional information. Local county health departments may also provide information on food safety policies pertaining to food distributors and preparers. Regularly scheduled training is beneficial to keep the network current on policies and procedures in all areas of food handling and distribution.

Section 4 Local Agency and Local Distributor

Local Agency Regional Plan

A Local Agency must develop a regional plan for the assigned service region, which shall include, but not be limited to:

- Criteria for soliciting and maintaining pantries/agencies for network.
- Procedure for the distribution of CSFP food packages throughout region.
- Procedure for inventory control.
- Procedure for Local Distribution delivery and/or pick-up.
- Procedure for informing a Local Distributor of the Local Agency of any new policy changes.
- Procedure for funding a Local Distributor, if applicable.

The Local Agency shall submit the regional plan for its service region to ODJFS at the beginning of each federal fiscal year and shall update as applicable.

Limited English Proficiency (LEP) Plan

Local Agencies must develop a plan to ensure the LEP population has meaningful access to all USDA and/or state funded programs. The plan shall include:

- A determination of the language(s) other than English that is/are most likely to be encountered at the facility(ies).
- An explanation of the methodology used to make the languages determined to be LEP.
- The methods for providing service to the LEP population. Examples include, but are not limited to:
 - Bi-lingual or multi-lingual staff employed by the agency.
 - Contract with a third-party entity who provides interpreting and/or translation services.
 - Other methods.

Local Agencies shall review their LEP Plan every two years and update accordingly.

Local Agency Program Monitoring

A Local Agency will complete an annual monitoring review of all CSFP Local Distributors within their network, if applicable. The review will include, but not be limited to:

- Recipient eligibility process,
- Nutrition education, if applicable,
- Storage practices,
- Ensure that proper signage is prominently posted (e.g., “And Justice for All,” poster),
- Reporting and record keeping requirements, and
- Compliance and civil rights.

A copy of the report of review findings for completed reviews and documentation ensuring compliance with corrective action will be maintained by the Local Agency for review by ODJFS at the time of the foodbank site review.

USDA may visit any Local Agency or Local Distributor at their discretion for review purposes.

Records Maintenance

All program records are to be maintained for a period of five years from the close of the federal fiscal year to which they pertain, or longer if related to an audit or investigation in progress. The records must be always reasonably accessible for use during management evaluations, site reviews, audits or investigations. The records are subject to be reviewed and audited by the ODJFS and or USDA during normal business hours or be sent to ODJFS and or USDA upon request.

Technology-Based Client Eligibility Process

A client eligibility and delivery documentation method, which utilizes a web-based or electronic process resulting in a paperless client eligibility and record keeping system shall be approved by ODJFS for use by a Local Agency. A Local Agency shall request approval from ODJFS to implement a paperless client eligibility and record keeping system by submitting a written description of the process, which must incorporate the current eligibility criteria and record keeping requirements. Any changes not already approved under a current waiver will need to be submitted to ODJFS for approval.

Local Agencies, who have been granted a waiver to implement an electronic client eligibility and record keeping system by ODJFS, should consider the cost to their member agencies for the equipment and the expense for maintenance, repair or upkeep of the equipment. There is no requirement for a Local Distributor to implement one system over another.

Section 5 Eligibility

CSFP Eligibility

Participant Eligibility Criteria:

Eligibility for participation in CSFP is based upon an applicant meeting the requirements for age, household income and residency. In accordance with 7 CFR Part 247, ODJFS has developed a list of criteria for certification to be used by the Local Agency and its Local Distributors.

Income Eligibility Criteria

Program eligibility for applicants is established at 150% of the federal poverty level. Applicants self-declare their income eligibility when signing the CSFP application. Proof of income is not required.

Age Requirement

An individual must be at least 60 years of age to participate in CSFP. Verification of age may be obtained through any of the following sources but not limited to:

- Birth certificate;
- Driver's license;
- State issued identification;
- Social Security Administration records;
- Passport or passport card;
- Birth certificate; or
- Any other reasonable, non-questionable document establishing the participant's age.

Identity Verification

An individual must present valid identification at application and recertification. Verification of identity may be obtained through any of the following sources:

- Birth certificate;
- Driver's license;
- Passport or passport card;
- Identification card issued by another assistance or social service program (e.g., Medicaid enrollment card);
- Veterans' Health Identification card;
- Work identification card; or
- Any other reasonable, non-questionable document establishing the participant's identification.

Residency Verification

Eligibility requires a determination of the residence of the applicant within the Local Agency's service area. Verification of residency may be obtained through any of the following sources:

- Recent utility bill;
- Driver's license;
- State issued identification; or

- Any other reasonable, non-questionable document establishing the participant's residency.

Migrant and seasonal farm workers entering a CSFP service area will be considered as meeting the residency requirement. Homeless individuals may use the address of a local shelter or pantry.

Proxy

When a participant has authorized a proxy to obtain a CSFP food package on their behalf, Local Agencies or Local Distributors are required, at minimum, to do the following:

- Obtain proxy designations in writing, including the period of time the designations are intended to cover;
- Maintain files of all written proxy designations; and
- Review proxy identification prior to each certification, recertification, and food package distribution.

Proxy Change

There are two ways to change a proxy:

- In a written statement, signed by the participant, or
- In-person at the Local Agency or Local Distributor's site, where proxy changes are noted and maintained in the participant file.

Household Size

Household is defined as a single individual or a group of related or non-related individuals, who are living as one economic unit, exclusive of boarders, who are not residents of an institution and for whom food is customarily purchased and prepared in common. No proof of household composition is required.

Homebound Participants

Eligible participants who are unable to attend distributions may designate a relative, friend or caregiver as their proxy for receipt of the food package. The proxy must provide some form of identification prior to receiving the client's food package. A proxy is not required to provide a signature to verify receipt of the food package. Staff or volunteers are required to verify the identity of who picks up the CSFP food package and ensure all food packages are properly accounted for. An example of accounting for CSFP package distribution could be a printout list of participants (or some other format) to document that it was received.

Eligibility Determinations

Eligibility determinations shall be conducted at each site by trained personnel. All certification data shall be recorded on the JFS 04220 "Commodity Supplemental Food Program (CSFP) Certification" form or an ODJFS approved electronic equivalent. Certification information includes the applicant's name, address and phone number; income, household size, race and/or ethnicity; the name and address of the proxy authorized to receive food on the participant's behalf; the date of the application received; the timeframe of the certification

period; the applicant's certification that he or she is eligible for the program, and the signature and title of the person making the eligibility determination. The form also details the CSFP appeals process. The applicant must sign that they have read the form or have had it read to them and that they understand their rights. When an applicant needs to correct information on the paper application, the applicant shall strike the incorrect information and initial next to the correction.

The Local Agency or Local Distributor must notify applicants determined to be eligible for CSFP benefits or being placed on a waiting list within ten days from the date of application. If eligible, the client must receive a notice with the location and scheduled dates and times for distributions. The notice must include the name, contact person, and phone number of the Local Agency or Local Distributor responsible for the distribution.

Applicants found ineligible for participation shall receive a written notice of their ineligibility within 10 days from the date of application indicating the reason for the determination, their rights regarding the appeal process as detailed on the certification form and a statement that program standards are applied without discrimination by race, color, national origin, age, sex, or disability.

Expiration of the Certification Period

The Local Agency must notify program participants in writing at least 15 days before the expiration date that eligibility for the program is about to expire. The Local Agency must include a statement in the written notification that informs the applicant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability.

A recertification review must occur by the end of the last month of the participant's 12-month certification period to continue receiving program benefits beyond the expiration of their certification period.

Participant Confidentiality

Local Agencies and Local Distributors must restrict the use or disclosure of information obtained from CSFP applicants or participants to persons directly connected with the administration or enforcement of the program, which includes persons investigating or prosecuting program violations.

All staff and volunteers of the Local Agency that provide services associated with USDA foods must maintain the strictest confidence and protect the confidentiality and security of all protected data and information to which they have access. Confidential information may include, but is not limited to, recipients of CSFP, household composition, names, addresses, and phone numbers. It may be from any source or in any form (oral, written, or electronic).

With the consent of the participant, as indicated on the application form, information may be shared with other health or welfare programs for use in determining eligibility for other programs or for program outreach. In accordance with 7 CFR 247.36, ODJFS must have executed an agreement with the administering agencies for these programs before the information can be shared. This is to ensure that the information will only be used for the specified purposes, and that agencies receiving such information will not further share it.

Certification Transfer

A participant, whose certification period has not expired, moves from one CSFP territory into another participating CSFP territory, must be given the opportunity to continue to receive CSFP benefits for the remaining duration of their certification period. When the Local Distributor has a waiting list, the participant must be placed on its waiting list ahead of all other waiting applicants. The Local Distributor that determined the participant's eligibility must provide verification of the expiration date of the certification period to the participant upon request. Participants may voluntarily withdraw from the program at any time during the certification period.

No-Show Policy

Local Agencies may discontinue an individual from participation when two consecutive distributions have been missed with no communication. The participant shall receive a written notification of discontinuance of benefits within *15 days* prior to the effective date of termination. The notification of discontinuance shall include the effective date of discontinuance, the reason for the participant's discontinuance, a statement of the individual's right to appeal the discontinuance through the fair hearing process, and a statement that informs the applicant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability.

CSFP Dual Participation

The JFS 04220 informs CSFP applicants that it is a program violation to participate at multiple CSFP sites. Simultaneous participation in CSFP at more than one distribution site will result in immediate elimination from the CSFP site where the participant does not reside. If dual participation has occurred due to a client's fraudulent information or action, the Local Agency shall initiate claim action against the client to recover the value of the benefits improperly received. Applicants are required to certify on the application that they understand the consequences of dual participation. This information is read to the participant or to the participant's representative if they are unable to read the information on their own.

Program Violations

Program violations are an action taken by a CSFP applicant or participant, or caretaker of an applicant or participant, to obtain or use CSFP benefits improperly. Program violations include the following actions:

- Intentionally making false or misleading statements, orally or in writing;
- Intentionally withholding information pertaining to eligibility in CSFP;
- Selling USDA Foods obtained in the program, or exchanging them for non-food items;
- Physical abuse, or threat of physical abuse, of program staff; or
- Committing dual participation.

Local Agencies should perform an application audit of a CSFP recipient when suspected fraud has been reported. During an application audit, which can be completed at the participant's next scheduled distribution, the Local Agency or Local Distributor should reverify the participant's residency, age and identity. The participant should be asked to confirm there has been no change to the income documented on their application.

CSFP Waiting List Procedures

Each distribution site will have a maximum caseload based on the number of slots funded for the program year. When a maximum caseload is reached, a waiting list shall be established. In establishing the waiting list, certification workers must include the date of application and information necessary to allow the Local Distributor to contact the applicant when caseload space becomes available. Unless the applicant has been determined ineligible, the person shall be notified of their placement on a waiting list within 10 days of the request. For an individual, who has remained on the waiting list for greater than six months, the Local Agency or Local Distributor shall perform a full certification prior to providing that individual with CSFP benefits.

When certifying a participant for only one month, the Local Agency or Local Distributor shall provide the participant notification of placement back on the waiting list at the time of issuance. The individual, who was temporarily certified, should not have any expectation that he or she will receive benefits for successive months, when the Local Distributor does not expect to have caseload available to do so.

Waitlist Details	
When the person remains on the waitlist fewer than six months, the Local Agency or Local Distributor should:	Confirm the following information: <ul style="list-style-type: none">• Has your address changed.• Do you still want to receive CSFP benefits.
When the person remains on the waitlist longer than six months, the Local Agency or Local Distributor must:	Perform a full certification before providing a CSFP food package.

Undistributed Food Packages

When a Local Distributor has undistributed CSFP food packages remaining after distribution, the following actions should be taken:

- Offer the packages to the first participant on the waiting list, if applicable.
 - Participants of such packages must be advised that there is no guarantee of a food package the following month.
- The Local Distributor should report the number of remaining CSFP food packages to the Local Agency.
- The Local Agency should reduce the number of CSFP boxes issued to the Local Distributor the next month by the number of undistributed food packages remaining at the end of the month.

Temporary Certification

A temporary certification period of one month may be assigned to participants who are on a waitlist and eligible to receive a distribution to fill any caseload slot resulting from nonparticipation by certified participants.

Participants who receive a temporary certification must be advised that participation in the following month(s) is not guaranteed.

CSFP Nutrition Education

The goal of the nutrition education component is to enable CSFP food program participants to obtain better nutritional status through increased understanding of basic nutrition principles and through effective use of food products. The following are essential to achieving that goal:

- The nutritional value of USDA Foods, and their relationship to the overall dietary needs of the population groups served.
- Nutritious ways to use CSFP foods.
- Special nutritional needs of participants and how these needs may be met.
- The importance of health care, and the role nutrition plays in maintaining good health.
- The importance of the use of the foods by the participant to whom they are distributed, and not by another person.

Local Agencies or another agency with which it has signed an agreement may use CSFP foods to conduct cooking demonstrations as part of the Nutrition Education provided to program participants, but not for other purposes.

One of the key components of providing Nutrition Education is the use of existing facilities and services.

The Supplemental Nutrition Assistance Education Program (SNAP-Ed) is a free Nutrition Education Program serving low-income individuals eligible to receive food assistance benefits or other means-tested Federal assistance programs throughout Ohio.

SNAP-Ed is funded by USDA's Food and Nutrition Service and serves in partnership with the Ohio Department of Job and Family Services and Ohio State University Extension. The goal is to improve the likelihood that families and individuals who receive SNAP benefits or another means-tested Federal assistance program will make healthy food choices and choose active lifestyles.

Cooperative Extension Offices are a good training resource for all participating agencies. The Cooperative Extension Office staff can provide training on health and safety procedures, instructions on the use of USDA food products and other pantry items in food preparation, and recipes and nutritional information. Local county health departments may also provide information on food safety policies pertaining to food distributors and preparers. Regularly scheduled training is beneficial to keep the network current on policies and procedures in all areas of food handling and distribution.

For contact information and to learn more about how SNAP-Ed is designed and delivered within a specific county, please visit the OSU Extension website at <https://fcs.osu.edu/programs/nutrition/snap-ed> and click on the county link, if applicable.

[MyPlate](#) is another resource that is a one-stop federal website that provides direct access to all of the services and resources available for USDA Foods Distribution Programs.

Action Plan

Each Local Agency, who serves CSFP participants is responsible for providing Nutrition Education that can be easily understood by participants. At a minimum, Local Agencies or

Local Distributors must distribute either monthly or semi-monthly Nutrition Education information with monthly food packages, which may be in the form of a flyer, newsletter or handout. Fact sheets containing this information are available at: [Household Programs USDA Foods Product information Sheets and Recipes](#).

Evaluation of Nutrition Education

Local Agencies are required to implement an evaluation procedure to determine the effectiveness of the Nutrition Education. The process must allow for participant input and may be conducted by the agency or by a contracted nutritionist or other qualified professional. Evaluations should be done annually and may be a random sample of the clientele.

Refusal of CSFP Foods

CSFP recipients may refuse any CSFP item they cannot use or do not want at the time of distribution. Refusal will not affect eligibility. Refused items must be returned to the Local Agency and placed back in inventory.

Orderly and Safe Distributions

Participants have the responsibility to contribute to an orderly distribution. An orderly distribution allows participants to be served in a safe and nonthreatening atmosphere. Occasionally, however, a site might face recurring issues with a disruptive participant. All Local Distributors should have a Code of Conduct policy in place that details the behavioral expectations during distributions and consequences for anyone who repeatedly or intentionally fails to follow this policy.

Ethnicity / Race Data Collection

Local Agencies must provide for and maintain a system to collect participant racial and ethnic data in accordance with Federal policy. Ethnicity and race data will be used to determine how effectively USDA/FNS programs are reaching potentially eligible participants, identify areas where additional outreach is needed, assist in the selection of locations for compliance reviews and aid in the completion of required reports.

Ethnicity / race data must be collected on all CSFP applicants. This is a requirement set forth by FNS. To ensure data quality, ethnicity data must be collected prior to racial data. Participants are free to select one or more racial designations on the CSFP application.

Participants must be given the opportunity to self-identify race / ethnicity and be informed that their responses to questions about their race / ethnicity will not affect consideration of their application. The data should be collected at the point of application, if applicable. If the applicant declines to self-identify ethnicity / race, the applicant should be informed that a visual identification of his or her race / ethnicity will be made and recorded accordingly.

Annually, during April, Local Agencies will collect racial and ethnic data on all participants receiving a CSFP package. This data is reported to ODJFS using the FNS-191 form. The report is due to ODJFS by June 1st. ODJFS must then submit the report to FNS by July 31st.

Section 6 Responsibility of CSFP Foods

USDA Foods Available

For a list of available USDA Foods that might be available through CSFP, go to <https://www.fns.usda.gov/csfp/commodity-supplemental-food-program>. Click on “USDA Foods Available List for CSFP.”

Shipment of Product from USDA to Local Agency

USDA provides for the transportation of CSFP foods to the Local Agency’s warehouse.

Direct Shipments

The vendor or carrier must arrange direct delivery shipment appointments with the Local Agency at least seventy two hours before the expected delivery date. For split shipments, the vendor or carrier must arrange for a delivery appointment with each Local Agency. The vendor or carrier may make an earlier delivery than scheduled, only if a new delivery date has been arranged that is acceptable to the Local Agency. When the vendor or carrier arrives without a delivery appointment or is late for an appointment, the Local Agency should accept the shipment, if able, or work with the vendor or carrier to schedule delivery at a later time. When a carrier does not make a delivery appointment in advance, it is recommended that when receipting for the delivery in the Web Based Supply Chain Management System (WBSCM), the Local Agency report the issue in the comment section, along with identifying the carrier.

For shipments originating from a vendor (i.e., any shipment not originating from a National Multi-Food Warehouse), the vendor must create the ASN in WBSCM in advance of delivery of the USDA Foods shipment to provide the Local Agency with sufficient advance notice of the delivery. The delivery appointment should be arranged with the Local Agency before entering the ASN into WBSCM. The vendor is encouraged to enter an ASN as soon as a delivery appointment is scheduled but is required to do so not less than 24 hours before the delivery. The ordering organization and receiving destination designated in WBSCM will receive the ASN by email.

Destination Changes – Direct Orders Only

Local Agencies needing to change the shipping destination for shipments originating from a vendor (i.e., any shipment not originating from a National Multi-Food Warehouse), after the purchase order (e.g., WBSCM shows the order is in the “Purchase” status) has been issued, must submit a request to ODJFS, which in turn must submit the request to the FNS Midwest Regional Office (FNS MWRO). The change request must be submitted at least forty-five (45) days prior to the 1st day of the delivery period. The new destination must already exist in WBSCM.

Multi-Food Shipments

Shipping delivery dates originating from a National Multi-Food Warehouse are set up at the beginning of each calendar year via WBSCM. The shipping delivery dates are agreed upon with each Local Agency, who is responsible for accepting shipments on the prearranged delivery dates. If the regularly scheduled delivery must be postponed (e.g., as a result of

inclement weather or equipment failure), the National Multi-Food Warehouse will immediately contact the Local Agency to determine a revised delivery date that is agreeable to both parties.

Seals

Seals are used to provide evidence of tampering and can assist in the detection of theft. In accordance with FNS Instruction 709-5, the Local Agency shall inspect each shipment and commercial delivery document (e.g., Bill of lading) carefully prior to unloading to ensure that the seal is intact, to determine the overall condition of the USDA Foods, the number of cases in the shipment, and to ensure the accuracy of the receipt. If the seal is broken or lacking, or the serial number on the seal does not match the number on supporting documentation (e.g., BOL), the Local Agency must refuse the shipment, including split shipments, and immediately notify Food Programs staff.

Per FD-152 Policy Memorandum, the United States Department of Agriculture's Agricultural Marketing Service (AMS) discontinued the requirement for vendors to use high security seals to secure USDA Foods deliveries. USDA deliveries are required to have a tamper-evident commercial flat metal, wire, or plastic security seal.

Re-Sealing for Subsequent Delivery

It is the responsibility of the vendor or carrier to reseal and rebrace the truck for subsequent deliveries, such as in split shipments, or shipments originating from a NMFW. In a split shipment, the Local Agency at the next delivery location, must ensure the seal(s) is intact and the serial number on the seal matches the number on supporting documentation. Issues related to resealing, such as broken or lacking seals, should be referred to Food Programs staff, which must in turn refer such issues to FNS MWRO.

Inspection / Quantity of USDA Foods

The Local Agency must inspect USDA shipments upon delivery for possible shortages, overages and/or damage before the product is accepted. The Local Agency may not accept product or sign the Bill of Lading (BOL) until the Local Agency warehouse agrees with the amount stated on the BOL. Once the BOL is signed, title is transferred to the Local Agency. By signature of the Local Agency warehouse representative, the Local Agency assumes liability and will be held financially responsible for product shown on the BOL. If the product is in questionable condition (i.e., damaged, infestation) or the quantity is not correct, then the Local Agency must take the following steps:

- Note the information on the BOL when signing.
- Obtain the signature of delivery/warehouse personnel on the BOL.
- Note in the comment section in WBSCM when receipting.

Unloading the Shipment

The Local Agency is responsible for unloading the shipment of CSPF foods and for removing and disposing of dunnage and other debris. The Local Agency may request reimbursement for costs associated with restacking items that arrive unpalletized or pallets that arrive poorly stacked if appropriate documentation, including photographs, is provided to Food Programs

staff before the shipment is accepted. Fees levied on the vendor or carrier (e.g., gate fees or lumber fees) are not permissible.

For shipments of refrigerated CSFP foods (e.g., cheese), the Local Agency must ensure the refrigeration unit remains on during unloading. For shipments originating from a NMFW, the Local Agency is responsible for unloading their entire order, including items that may be segregated and ensuring that proper temperature is maintained.

Local Agencies are responsible for unloading palletized loads, even if they do not have the proper equipment to handle the pallets. In addition, Local Agencies should inquire at the time of delivery scheduling if any USDA direct shipments are slip-sheeted rather than palletized. Local Agencies are responsible for providing the proper equipment and off-loading labor for handling slip-sheeted loads.

Free Time

The Local Agency must complete the unloading of the shipment and removal of dunnage and other debris within the period of free time. For palletized loads, free time is up to two hours. For non-palletized loads, free time is up to six hours. USDA may make exceptions for additional free time. Failure to complete unloading within the free time may incur a demurrage or detention charge, which the Local Agency may be obligated to pay.

Signing for USDA Foods

The Local Agency must sign to validate receipt when CSFP foods are delivered. Likewise, each Local Distributor must sign for receipt of CSFP Food packages when the Local Agency delivers them, or when the Local Distributor picks up. Local Agencies and Local Distributors and others authorized to possess CSFP foods must ensure that CSFP foods are safeguarded. Any entity that stores CSFP foods for any period must become familiar with and adhere to state and local health codes that apply to stored food products.

Electronic Receipting for USDA Foods

FNS Instruction 709-5, Shipment and Receipt of USDA Foods, establishes the responsibilities for shipment and receipt of USDA Foods. The standards and procedures in this instruction are necessary to determine whether shipments of USDA Foods are received in optimal condition and the quantities ordered, and in ensuring the proper disposition and replacement of USDA Foods when circumstances warrant. Each Local Agency shall enter all shipping receipts within two calendar days of delivery into WBSCM. This requirement applies to both direct and multi-food shipments of CSFP foods.

Storage and Handling

A Local Agency becomes responsible for CSFP product when physical delivery is taken. Liability for loss, theft or damage due to negligence is the sole responsibility of the Local Agency. All CSFP foods carry an assigned value based on USDA's cost of purchasing, processing and distribution of the food products to states. In order to guarantee its quality and safety, each Local Agency is responsible for the proper storage and handling of CSFP food products. Premature deterioration of food products is often the result of improper storage conditions and practices. Every effort must be made to reduce loss due to spoilage, pest infestation and theft by following accepted warehousing methods. This action not only ensures quality products being distributed but also protects the Local Agency from claim action by ODJFS to recover the value of the spoiled or lost product.

Food storage areas shall provide protection from weather, fire, theft and pests. Aisles between pallets shall be wide enough to provide easy access for inspection, inventory and pulling of product. All CSFP food products are to be stored at the Local Agency's warehouse or at a storage facility contracted for by the Local Agency.

A Local Agency must follow good warehouse and storage practices. Functional thermometers must be present and visible in all storage areas. Temperature logs shall be maintained for all storage areas. The log shall document the date and time, the registered temperature and signature or initials of person checking the temperatures. This log is an important document to support the ongoing maintenance of proper storage conditions and shall be maintained on file in accordance with record retention requirements. These practices include, but are not limited to:

- Keeping all food no less than 6" off floor, stored on pallets, platforms or shelves.
- Keeping all food no less than 6" away from walls. This promotes air circulation and accommodates pest control.
- Keeping all non-food items separate from food. Toxic items (soap, bleach, cleaning supplies, etc) must be kept away from food items.
- Keeping floors, pallets and shelving clean.
- Keeping doors, windows and roofs well sealed to prevent pest entry and water damage.
- Maintaining proper temperatures.
- Maintaining a good pest control system.
- Having a qualified person on staff or a contract with a licensed firm to handle pest control management.
- Maintaining equipment including regularly checking for leaky compressors in freezer and refrigeration units, hydraulic forklift leaks, etc.
- Maintaining thermometers in all refrigeration units and dry storage areas.
- Maintaining temperature logs for each area.
- Assuring that all Local Distributors have thermometers in place and that freezer, refrigeration units are adequate, operative, and temperature logs are utilized.

To assure the quality and freshness of USDA food products, the inventory practice of first-in-first-out (FIFO) must be followed. USDA Foods must be stored so cases with the oldest pack dates are used first. All USDA food products have the pack date on the cases. A Local Agency's warehouse and contracted storage facilities shall maintain a running inventory of all CSFP food products. ODJFS staff shall routinely assess foodbank inventory levels to assure that CSFP product inventories are not excessive.

Dry Food Storage

Dry food products shall be stored:

- At 50 - 72 degrees F,
- Away from direct sunlight,
- A minimum of no less than 6" off the floor,
- A minimum of no less than 6" away from walls, and
- In a clean and secure storage area that is inspected regularly.

The basic rules for stacking food products are:

- Limit the height of the stack so cases of food on the bottom layers will not be crushed; cross-stack cases on pallets to ensure the stack will be sturdy and solid and will not tip when being moved.
- Shrink wrapping provides added stability.
- Stack cases away from potential damage by heat, steam or water.

Refrigerated

Food products requiring refrigeration shall be:

- Refrigerated at temperatures of 32 - 36 degrees F,
- Stored to allow for proper air circulation, and
- In a refrigerator that is clean and inspected on a regular basis.

Maintenance of Storage Area

- An ongoing system of pest control is required. Pest controls such as traps and glue boards are recommended. Place traps along walls and near doorways, moving the traps monthly.
- Pest control poisons must be approved by USDA for use in food storage and distribution facilities.
- Poisons may only be used by a licensed professional.
- Ensure there is a cleaning schedule established listing the necessary frequency of cleaning for each location. Floors, including under pallets, should be swept and cleaned at least monthly. Floors in high traffic areas require regular cleaning. Area soiled by spillage or breakage must be cleaned immediately. Broken pallets should be discarded and dirty pallets cleaned.
- Empty pallets should be stored apart from food products.
- Maintenance of the exterior of the warehouse must not be overlooked. The building and grounds should be inspected regularly for signs of fire hazard, pest infestation, security problems and needed repairs. An eighteen-inch exterior barrier of weed and grass control must be maintained to facilitate inspections. Garbage, waste or rubbish must be disposed of frequently and not allowed to become nesting areas for pests.

Damaged and or Out-Of-Condition Product

Out-of-condition products are USDA foods that are no longer fit for human consumption as a result of spoilage, contamination, infestation, adulteration, or other damage. Bulging cans or cans with sharp dents and rust on the seams are examples of out-of-condition products. Hidden damage may be found after the product has been accepted into the warehouse. All incidents of damaged and/or out-of-condition product must be reported to ODJFS on the Report of Storage Losses and/or Damages within fifteen days from the date of discovery.

The information required is:

- Local Agency's name,
- Address,

- USDA product information (material number, amount, date received),
- Type of damage or loss,
- Contact Person, and
- Date damage/loss discovered.

Before disposing of CSFP food that is infested or spoiled, Local Agencies shall contact Food Programs staff for further instruction. Product must be disposed of through a contracted service which provides a disposal or dump certificate. All information is to be forwarded to Food Programs for claim resolution, if applicable.

A Local Agency is required to establish a procedure to record instances of damage and/or loss of CSFP foods by a Local Distributor. The procedure shall include the collection of the following information:

- Local Distributor name, address, contact person and phone number,
- Product name, delivery order number and quantity affected,
- Date damage/loss discovered,
- Explanation of damage/loss, and
- Disposition of product.

Claim Action

As described in FNS Instruction 410-1, ODJFS shall investigate any loss of USDA Foods, or any improper use or loss of funds regardless of the value of the loss, in order to determine if a claim must be pursued against the party responsible for the loss. Such claim determination shall be completed within thirty days from the date of discovery of the loss, or from the date that information was first received indicating that the loss had occurred, whichever is later. As part of the claim determination, the Local Agency shall report any loss of USDA Foods, or any improper use or loss of funds to ODJFS via the JFS 01433 "Report of Storage Loss and/or Damage" within fifteen days from the date of discovery.

No claim determination shall be required when the value of the lost USDA Foods does not exceed \$500. However, no claim shall be disregarded when the loss occurred as a result of the following:

- Theft;
- Embezzlement;
- Willful misapplication; or
- Fraud

ODJFS shall maintain records and substantiating documents on all claim actions and adjustments including documentation of those cases in which no claim was asserted because of the minimal amount involved. In making final claim determinations for USDA Food losses incurred by Local Agencies when there is no evidence of fraud or negligence, ODJFS and MWRO shall consider the special needs and circumstances of the Local Agencies and adjust the claim and/or conditions for claim collection as appropriate. These special needs and circumstances include but are not limited to the Local Agency's use of volunteers and limited financial resources and the effect of the claim on the organization's ability to meet the food needs of low-income populations.

USDA Foods that are left out of their original environment (e.g., refrigeration) will automatically result in claim action unless a reasonable explanation is given.

USDA Foods Transfer

Sometimes a Local Agency may need a food item to cover a temporary inventory shortage for one of the CSFP categories. Local Agencies may transfer USDA Foods from one program to another but ODJFS must obtain first approval from FNS. However, ODJFS does not need FNS approval to transfer USDA Foods within the same program.

- **EXAMPLE:** Foodbank A cannot utilize, timely and in optimal condition, CSFP green beans. Food Programs staff will facilitate the transfer of CSFP green beans to Foodbank B, who also operates CSFP and is in need of the item. The transfer does not require FNS approval.
- **EXAMPLE:** Foodbank A notifies Food Programs staff of an excess of The Emergency Food Assistance Program (TEFAP) corn and requests to transfer the corn to Food Bank B, who operates CSFP and TEFAP. The TEFAP corn must also be found available under CSFP. Food Programs staff must request approval from FNS because the transfer occurs across two programs — CSFP and TEFAP. All entities must maintain records of a transfer. For more about record retention,

Inventory Insurance

Local Agencies must obtain insurance to protect the value of CSFP food inventories. Reasonable insurance premiums are allowable costs. The insurance amount must be at least equal to the entity's average monthly value of month-end USDA Foods inventories in the previous fiscal year (as determined by one of USDA's Foods valuation methods in 7 CFR Part 250). FNS has reserved the right to grant an exemption to entities that maintain a small amount of USDA Foods inventory. Refer to Policy Memo FD-139 Clarification on Inventory Protection Requirements.

Holds and Recalls

FNS notifies ODJFS of a hold or recall providing instructions, replacement of recalled foods, and reimbursement of specific costs related to the recall. ODJFS will notify Local Agencies and may request them to report the amount of affected product in their possession, as well as whether the product was delivered to other agencies. If USDA Foods are on hold, the Local Agency and Local Distributors, if applicable, must segregate the product until FNS either releases the hold or provides further information.

Public Notification of a Recall

ODJFS recommends that the Local Agency and Local Distributor, if applicable, broadcast recall information in ways that a participant can be reached. The Local Agency and Local Distributor may take further action as they deem necessary.

CSFP Foods Complaints

All USDA foods complaints are entered into the Web-Based Supply Chain Management (WBSCM) tool. Damaged product, temperature, and over/short problems should be entered into WBSCM by designated Local Agency staff when receipting the order number in WBSCM. However, there may be hidden damage or food quality complaints discovered after the order number has been receipted in WBSCM.

When Local Agencies have complaints regarding hidden damage, quality or quantity issues on CSFP foods discovered after the order number has been receipted in WBSCM, provide the following information to Food Programs staff.

- Can and case codes.
- Description of the problem and whether anyone reported feeling sick or being injured from consuming the product, if applicable.
- Date Local Agency received the product.
- Quantity of product involved (i.e., overage, shortage).
- Quantity of product remaining and if the remaining product is affected or not.
- Sales Order Number and Purchase Order Number, if applicable.
- The specific circumstances involved (for example - "The damaged canned product was received 2 months ago, but the cases were located in the middle of a pallet that could not be seen until the cases were broken out." OR "The temperature in the reefer unit at the time of delivery was 50°F when the cheese shall have a temperature of no higher than 45°.")
- Digital photographs of damaged product or infested product.

CSFP Inventory Report

The CSFP inventory report is due to ODJFS no later than the second Friday of the month following the month to which the report pertains through the online CSFP Reporting Tool. The month-end data must accurately reflect the Local Agency's beginning and ending inventory balances, new receipts, food losses, any products that were transferred in or out, total number of participants served, and any positive or negative adjustments.

And Justice For All Poster

All agencies must have posted at their facility, in plain sight, Form AD-475A “And Justice For All” poster available on the web at [Form AD-475A](#). All information materials and sources, including websites, used by Local Agencies and Local Distributors to inform the public about FNS programs shall contain the full non-discrimination statement. It is not required that the non-discrimination statement be included on every page of the program website. At a minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information. When the material is too small to permit the full non-discrimination statement to be included, the material shall, at a minimum, include the following statement in print size no smaller than the text: “This institution is an equal opportunity provider”.

The following non-discrimination statement applies to ODJFS and its Local Agencies and Local Distributors:

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:

(1) 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 (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Unrelated Activities

As a condition of receipt of USDA Foods, Local Agencies and Local Distributors cannot require or coerce clients to:

- Attend a religious service,
- Participate in prayer,
- Join a counseling group,
- Attend budgeting, parenting or job training classes, and or
- Do odd jobs.

Activities unrelated to the distribution of CSFP food packages may be conducted at sites as long as:

- The person(s) conducting the activity makes it clear that the activity is not part of CSFP and is not endorsed by USDA and or ODJFS.
- Cooperation in the activity is not a condition of the receipt of program CSFP foods.
- Information about the activity is not placed in or printed on boxes in which CSFP foods are distributed.
- Program participants cannot be solicited to contribute money, sign petitions or converse with the persons conducting the activity.
- The activity is not conducted in a manner that disrupts the distribution.

ODJFS, Local Agencies and Local Distributors must promptly investigate discrimination complaints received in connection with the distribution of program USDA Foods. All agencies shall maintain a record of complaints, investigations and resolutions. USDA reserves the right to conduct investigations and make the final determination on the proper handling of all complaints.

Written Notice of Beneficiary Rights for CSFP

In accordance with 7 CFR Part 16.4(c)(1), all organizations administering CSFP must provide a written notice to all beneficiaries and prospective beneficiaries of certain protections in a manner and form prescribed by Policy Memorandum FD-155. Local Agencies must provide CSFP applicants with the JFS 01409 "Written Notice of Beneficiary Rights for CSFP" at the time of application.

A Local Agency must maintain records to document the receipt, disposal and inventory of CSFP foods that they, in turn, deliver to eligible Local Distributors or program participants. A Local Distributor must sign a receipt for CSFP food packages, which they receive for distribution. Records of all such receipts must be retained by the Local Agency and Local Distributor, respectively.

Records Retention

All program records are to be maintained for a period of five years from the close of the federal fiscal year to which they pertain, or longer if related to an audit or investigation in progress. The records must be reasonably accessible at all times for use during management evaluations, site reviews, audits or investigations.

Electronic Record Keeping

Food Programs allows for electronic record keeping, including the collection of distribution records and participant signatures, provided that the Local Agency can assure that the same degree of confidence results from the electronic system as from the traditional, paper-based system. Any electronic system must provide for records to be made available to Federal and State agencies conducting reviews required by Federal regulations.

Section 9**USDA Food Distribution National Policy Memoranda**

USDA continually issues administrative guidance via policy memorandum for all food distribution programs. Copies of the memoranda can be obtained online at the USDA website: <https://www.fns.usda.gov/fdd/policy>

Section 10 Report Forms

State Forms

ODJFS creates and provides forms that must not be altered except with approval from ODJFS. Please note that all are subject to an on-going review and may be revised at any time.

The JFS forms for Local Agencies and Local Distributors may be found online at the JFS Forms Central website: <http://www.odjfs.state.oh.us/forms/inter.asp>

JFS 04220 CSFP Certification

State form developed by ODJFS for use by a client in making application for participation in CSFP.

JFS 01414 CSFP Site Review Foodbank (Local Agency)

State form developed by ODJFS for site review purposes at the Local Agency.

JFS 01415 CSFP Site Review Local Agency (Local Distributor)

State form developed by ODJFS for site review purposes at Local Distributors.

JFS 01433 Report of Storage Loss and or Damage

State report form to be used when reporting food losses due to spoilage, contamination, infestation, damage, or other issues that make the food no longer fit for human consumption. The Local Agency shall report any loss of CSFP foods, or any improper use or loss of funds to ODJFS within fifteen days from the date of discovery.

JFS 01409 Written Notice of Beneficiary Rights for CSFP

Federal Forms

FNS-153 Report

Federal report which details the monthly inventory and distribution of CSFP foods, submitted electronically by ODJFS to USDA/FNS, Midwest Regional Office. Food Programs staff enters monthly report data into FPRS.

FNS-191 Racial/Ethnic Group Participation Report

This federal report compiles the racial/ethnic group participation in CSFP for the month of April in any given year. A Local Agency completes the report, profiling all participants receiving a CSFP food box in the month of April and submits the report to ODJFS no later than June 1st. ODJFS submits all of the reports via the Federal Program Reporting System.