Commodity Supplemental Food Program

Program Manual for Administration Staff
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**Section 1: General Information**

**A. Introduction**

The Commodity Supplemental Food Program (CSFP) is administered at the Federal level by the Food and Nutrition Service (FNS), an agency of the United States Department of Agriculture (USDA). The program is authorized under Section 4(a) of the Agriculture and Consumer Protection Act of 1973. Federal regulations covering CSFP may be found in 7 CFR, Parts 247 and 250.

The USDA maintains a web site with pertinent information about its Food Distribution Programs. Individual USDA Program Home Pages are updated on a regular basis providing a source of current information. To access the Federal Regulations, Commodity Fact Sheets, WBSCM and other information of interest, log on to [USDA Food and Nutrition Service, Food Distribution Programs](http://www.fns.usda.gov/fdd/food-distribution-programs).

The CSFP works to improve the health of people at least sixty (60) years of age by supplementing their diets with nutritious USDA commodity foods. It provides food and administrative funds to States to supplement the diets of eligible participants.

CSFP food packages are not meant to provide all food sources required for complete dietary needs during a month, but rather are meant to provide good sources of nutrients typically lacking in the diets of the target population.

State and local agencies order food using the USDA Web Based Supply Chain Management (WBSCM) system. USDA allocates funds as provided by Congress to help offset administrative costs. Local agencies determine the eligibility of applicants, distribute food, and provide nutrition education. Local agencies also provide referrals to other welfare, nutrition, and health care programs such as the Supplemental Nutrition Assistance Program (SNAP).

**B. State Distributing Agency Designation**

1. The Michigan Department of Education (MDE) has been designated by the Governor as the state agency responsible for CSFP.

2. The MDE Office of School Support Services, Food Distribution Unit, administers all USDA Food Distribution Programs including the CSFP, the National School Lunch Program (NSLP), the Summer Food Service Program (SFSP) and The Emergency Food Assistance Program (TEFAP)

MDE amends the CSFP State Plan to USDA as necessary. A copy of the plan is available upon request.
C. Local Agency Designation

1. MDE has designated community action agencies in Michigan with the responsibility of distributing USDA Foods locally.
2. Each local community action agency enters into an annual agreement with MDE.
3. MDE and/or the USDA have the responsibility for monitoring local grantee agencies.

The CSFP in Michigan is administered locally by the following nonprofit entities:

- Area Community Service Employment & Training Council (ACSET) of Kent Co.
- Capital Area Community Services
- Community Action Agency of South Central Michigan
- Dickinson-Iron Community Service Agency
- Five CAP, Inc.
- Focus: HOPE, a metropolitan Detroit service organization
- Genesee County Community Action Agency
- Gogebic-Ontonagon Community Action Agency
- Human Development Commission
- Kalamazoo Loaves and Fishes
- Mid-Michigan Community Action Agency
- Muskegon-Oceana Community Action Partnership
- Monroe County Opportunity Program
- Northeast Michigan Community Service Agency, Inc.
- Northwest Michigan Human Services Agency
- Oakland-Livingston Human Services Agency – Livingston County
- Oakland-Livingston Human Services Agency – Oakland County
- Ottawa County Community Action Agency
- Southwest Community Action Agency

A complete agency directory is available on MDE’s Food Distribution website at [Michigan Department of Education](http://www.michigan.gov/mde).

D. Responsibilities of Local Agencies

1. Willing to serve the needs of all eligible participants in their geographic area.
2. Establish distribution sites in sufficient number and appropriate locations.
3. Monitor distribution sites to verify program compliance.
4. Submit electronic Agency Application-Agreements by the beginning of each fiscal year (October 1). This document specifies the responsibilities of both the local agency and MDE.
5. Perform outreach to promote program and identify areas of service within their service area.
Section 2: Participant Information Eligibility and Certification

A. Participant Eligibility
Eligibility determinations are conducted at local agencies by authorized personnel. All certification data is recorded on an intake or application form. Certification for an individual to participate in CSFP requires:

- Categorical eligibility as “a person of age 60 years and older”.
- Income that meets current CSFP Income Guidelines.
- Determination and establishment of applicant’s residency.

B. Confidentiality
Throughout this process, confidentiality of client information must be strictly observed. This means no discussion of client’s identities or other personal information outside of job-related needs.

C. Participant Income Guidelines and Verification

1. Income Guidelines: Seniors (age 60 and older) must have a household income at or below 130% of the current Federal Poverty Income Guidelines. Current income guidelines are available on the MDE Food Distribution web page.

2. Income Verification: Income refers to total cash receipts before taxes. “Income” is defined as total gross income of all household members in the economic unit, excluding a foster child, before any deductions and any amount received or withdrawn from any source, including savings. Eligibility should be based on current income status, defined as cash receipts for the current month.

3. For eligibility purposes, the following items are counted as income:

   a. Wage and salaries before any deductions as shown by a current pay check stub, pay envelope showing total gross pay, letter from employer, or tax return;
   b. Receipts from non-farm and farm self-employment, defined as receipts from a person’s own business or farm after deductions for business or farm expenses;
   c. Regular payments from Social Security, railroad retirement, unemployment compensation, strike benefits, veterans’ benefits, public assistance, including Supplemental Security Income (SSI), training stipends, alimony, private pensions, government employee pensions, and regular insurance or annuity payments;
   d. Income from dividends, interest, rents, royalties, or periodic receipts from estates or trusts; and
   e. Child support payments.

4. For eligibility purposes, the following items are not counted as income:
a. Capital gains;
b. Any assets acquired through withdrawals from a bank account, the sale of
property, house, or car;
c. Tax refunds, gifts, lump-sum inheritance, one-time insurance payments
or compensation for injury;

e. Food or rent received in lieu of wages;
f. The value of food and fuel produced and consumed on farms, and the
imputed value of rent from owner occupied non-farm and farm housing;
g. Federally funded student financial assistance; and
h. Student loans.

D. Participant Residency Requirements
Eligibility requires a determination of the applicant’s residency. Residence is
established by recent utility bills, driver's license, state identification card, Medicaid,
or Medicare cards. The local agency may not require that an individual reside within
its geographic area for a fixed period of time.

E. Special Cases
1. **Homeless Individuals** - Local agencies may waive residency requirements
   for homeless individuals. However, homeless individuals must be able to
   store, prepare, and consume their food separately from other individuals at
   their temporary shelter. The homeless individual may not receive food on
   behalf of a shelter or proxy.

2. **Foreign Nationals** - Citizenship is not a prerequisite for participation in
   CSFP, but an individual must be a legal resident of the United States.
   Verification of documents is not required.

3. **Disabled Individuals** - Disabled individuals must meet the same eligibility
   criteria required of all program recipients.

F. Age Verification
Proof of age may be established by any of the following documentation:
   a. Birth certificate
   b. Driver’s license
   c. Church records
   d. School records
   e. Medical records
   f. Family records
   g. Social Security card
   h. Civil Service award letters
   i. Medicaid card
   j. Medicare card

G. Certification Procedures
   i. Applications
   An applicant must complete a CSFP Application and provide the following
   information:
a. Name and address, including some form of identification for each applicant
b. Household income
c. Household size
d. Other information related to eligibility, such as:
   A. Proof of age
   B. Proof of residency
   C. Proof of income

ii. Rights and Responsibilities
Applicants must be informed of their rights and responsibilities in writing or orally as follows:

I. The local agency will provide written notification of a decision to deny or terminate CSFP benefits and of an individual’s right to appeal this decision by requesting a fair hearing.

II. The local agency will make nutrition education available to all eligible participants.

III. The local agency will provide information on other nutrition, health, or assistance programs, and make referrals as appropriate. Flyers in packages are a good choice.

IV. Improper use or receipt of CSFP benefits as a result of program violations, may lead to a claim against the individual to recover the value of the benefits, and may lead to disqualification from CSFP.

V. Participants must report changes in household income or composition within ten (10) days after the change becomes known to the household.

VI. The local agency will provide notification of eligibility or ineligibility within ten (10) days of application.

iii. Non-discrimination Statement
The certification form must also include the current complete USDA non-discrimination statement that informs the applicant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability. The current version of this statement is available at www.michigan.gov/mde-fdp

iv. Certification Statement
The following statement must be read by or to the applicant before signing:

“This application is being completed in connection with the receipt of Federal assistance. Program officials may verify information on this form. I am aware that deliberate misrepresentation may subject me to prosecution under applicable State and Federal statutes, and that I may not receive CSFP benefits at more than one CSFP site at the same time. I understand that the information provided may be shared with other organizations to detect and prevent dual participation. I acknowledge that I have been advised of my rights and obligations under the program. I certify that the information I have provided for my eligibility determination is correct to the best of my knowledge. I authorize the release of information provided on this application form to other organizations administering assistance programs for
the use in determining my eligibility for participation in other public assistance programs and for program outreach purposes.”

Please indicate decision by placing a checkmark in the appropriate “Yes” or “No” box.

v. Certification Forms
Certification Forms must include:
1. Signature and title of the person making the eligibility determination;
2. Date the application is initiated and the date of certification or denial; and
3. Name of Assigned Proxy (if applicable).

The form may be used for other local agency programs as long as the elements required for CSFP are present and the applicant has the opportunity to allow or refuse the release of information to other organizations administering assistance programs.

Copies of income documentation are not required to be maintained on file as the intake staff’s signature certifies income is at or below guidelines.

Certification forms should be available at sites during each distribution for completion by new participants.

4. Eligibility determination.
5. Date the application is initiated and the date of certification or denial.
6. Name of Assigned Proxy (if applicable)

H. Fair Hearing Notification
At the time of certification and recertification, applicants must be informed that they have a right to a fair hearing and that they may appeal any decision made by the local agency regarding denial or termination from the program.

1. An applicant may appeal a decision verbally or in writing at the administering agency headquarters and request a hearing.
2. As stated in CSFP CFR 247.33, “The fair hearing must be conducted by an impartial official who does not have any personal stake or involvement in the decision and who was not directly involved in the initial adverse action that resulted in the hearing.”
3. An "impartial official" may be the CSFP Program Director or a program administrator from another agency program or department.
4. An applicant has the right to an appeal if he/she disagrees with the result of the Fair Hearing.
5. The appeal may be overseen by CSFP Agency Executive Director or their designee who meets the definition of an “impartial official”.

Each agency should have a written policy that explains their fair hearing procedure that includes the following elements:

1. Applicant has 60 days from the time of denial or dismissal to request a Fair Hearing.
2. Applicant receives notification of the Fair Hearing at least 10 days prior to the scheduled hearing.
3. Applicant receives a written decision from the Fair Hearing within 45 days of the request for the hearing.
4. Applicant may request an appeal within 10 days of receiving the fair hearing decision.

I. Health and Social Service Referrals
During the certification procedure, each individual should be given information to obtain specific needed assistance and services. In addition to the personal interview intake procedure, each agency should have printed information about various programs displayed in its offices and/or distribution centers. Information should be made available to all participants about the Supplemental Nutrition Assistance Program (SNAP).

J. Certification Period
Elderly persons shall be re-certified at intervals of every six (6) months. The odd number certification must be based on an assessment of newly submitted information (except that age only needs to be established at the first certification).

As permitted by regulation, the State agency authorizes local agencies to certify elderly participants at the even-number certification periods without a formal review of eligibility data as long as the person’s address and continued interest in receiving program benefits are verified; and the agency has sufficient reason to believe that the person still meets the income eligibility standards (e.g., the elderly person has a fixed income).

K. Waiting Lists
Local agencies should contact MDE before placing potential clients on a waiting list, as additional slots may be available. MDE has a responsibility to ensure that the State’s assigned caseload is fully maximized. Therefore, caseload assignments to local agencies may be shifted to ensure 100% statewide.
M. Proxy Forms

Participants, who may have difficulty obtaining their USDA Foods at normal distribution times, may designate a proxy when they are certified. For emergency situations, the participant may send a new proxy with a signed note requesting the pick-up of the USDA Foods.

When the food package is picked up by a proxy, the proxy signs his/her own name next to the participant’s name.

Approved methods to allow a proxy to pick up food for another person include the following:

A. Present identification and a signed note or proxy form from the participant; or
B. Previously designated proxy with identification; or
C. Presenter completes signature sheet with participant’s name followed by the word “proxy.”

Social Security numbers may not be collected as part of the CSFP eligibility screening, in compliance with the Privacy Act of 1974.

Section 3: Distribution Information

A. Food Package Requirements
USDA Foods distributed by CSFP include a variety of cereals, canned meats, chicken/fish, fruits, juices, vegetables, peanut butter, dry beans, nonfat dry milk, UHT 1% milk, rice, or pasta, and cheese. The CSFP food packages do not provide a complete diet, but rather are good sources of the nutrients typically lacking in the diets of the target population, i.e., calcium, iron, protein, and vitamins A and C.

B. Tailored Food Packages
Since CSFP is a supplemental food program, tailoring of the food packages is encouraged. Below are some common situations where tailored food packages are appropriate. If other situations are encountered where a tailored package may be needed, please contact the MDE consultant for CSFP for suggestions.

1. Vegetarian: Individuals choose diets without meat for a variety of reasons including ethical, religious, and health concerns. At this time, a CSFP participant who is a vegetarian may decline the meat, but may not receive peanut butter or dry beans instead of meat because these foods are in different categories. He/she may receive the 18 oz. container of peanut butter or dry beans during the months when these foods are being issued.

2. Low sodium: Some seniors may request a low sodium food package. Participants may be instructed to lightly rinse all canned vegetables to remove most of the salt.

3. Low sugar or diabetic: USDA commodity fruits are packed in light sugar syrup. Instruct participants to lightly rinse canned fruits to remove syrup.
4. Low cholesterol or low fat: Cholesterol is only found in foods of animal origin while fat is found in most animal foods as well as in nuts, vegetable oils, and margarine. Some individuals may request a low fat or low cholesterol food package. For these individuals, dry beans may be substituted for peanut butter. Participants should be advised that most of the fat in the meat products can be removed by refrigerating the canned meat, chicken/fish which will solidify the fat making it easy to skim off.

C. Food Distribution Procedures
1. CSFP agencies distribute food to participants on a monthly basis. All food centers must be barrier free and accessible to the handicapped.

2. Do not facilitate clients’ sharing unwanted USDA Foods by providing a collection table. Refused items must be returned to the agency inventory.

3. Agencies should inform clients that USDA Foods are for their personal use. Local agencies’ distribution systems vary. Distribution methods include both participant choice/shopping and prepackaged CSFP boxes. Some agencies offer both shopping and pre-packed boxes.
   a. Participant Choice/Shopping - Clients select from a variety of foods within each category that together meet the food package requirements.
   b. Pre-packaged boxes of food may be distributed using the following methods:
      i. Off the back of a truck to each participant after he/she signs the roster; or
      ii. From a senior center or residential building.

D. Limited English Proficiency Plan
Distribution sites must be able to manage the needs of non-English speaking participants according to the level of need at that location.

A Limited English Proficiency Plan (LEP) is required. The LEP must provide support and direction for dealing with non-English speaking participants or applicants.

This plan should reflect the current level of need at the distribution site. It is strongly recommended that a LEP include:

1. I Speak cards or similar documents for identifying language needs
2. Contact information for translation services. Free online or telephone translation services may be available in the area for use.
3. Directions for collecting information, providing translation, and distribution of USDA food.

If a significant proportion of the population in an area is comprised of non-English or limited-English speaking persons with a common language, local agencies must ensure that such persons are informed of their rights and responsibilities in the program in an appropriate language. The agency must also provide program information to such persons in the appropriate language.
E. Public Outreach

Every attempt should be made to provide information about CSFP to all segments of the eligible population. Referrals should be solicited from other service agencies which also are in contact with low-income families and individuals. Building participation through a network of existing service groups also helps to ensure that program beneficiaries receive food in combination with other forms of assistance.

An important part of outreach is keeping community leaders informed about the agency’s activities. This should include elected representatives on the local, state, and federal levels. Congressional representatives and their aides should be invited to visit agency distribution sites and be kept informed on how many of their constituents benefit from the program. Congress provides the funding for CSFP.

Examples of Outreach Activities include:

1. Public service announcements on local television and radio stations.
2. Professionally designed posters placed in public transportation, social service outlets, doctors’ offices, clinics, child care centers, senior housing units, hospitals, churches, and unemployment offices.
3. Staff presentations at community-based health fairs and workshops sponsored by medical clinics, religious groups, Heat Start programs, community service agencies, senior housing units, and grassroots organizations.
4. Program pamphlets with information on certification and distribution sites. The pamphlet should contain the agency’s address, telephone number, and hours of operation. Other useful information would include: eligibility requirements, methods of food package pick-up available to participants, and types and quantities of available food.
5. Civil Rights regulations require that in areas with large ethnic populations, program information be translated into the appropriate language and distributed at cultural centers and service agencies.
6. Automated phone call system to announce upcoming distribution information.

The agency name and “Commodity Supplemental Food Program” must appear on all printed materials and signs promoting the program. Federal regulations require that all printed materials regarding USDA household commodity programs produced by the local agency for the public also include the USDA non-discrimination statement. Agency vehicles should advertise the Commodity Supplemental Food Program.

It is very important that clients know what agency is serving them and the name of the program.

F. Nutrition Education

The goal of Michigan’s CSFP agencies’ nutrition education program is to enable participants to obtain better nutrition status through increased understanding of basic nutrition principles and through effective use of food products. The local agency must make nutrition education available to all adult participants and to parents or caretakers of child participants.
i. **Annual Nutrition Plan**

Each local agency must submit its nutrition education plan for the fiscal year as part of their Agency Application by October 1st. The plan must address the following points:

a. The agency’s CSFP nutrition education goals for the year;

b. The action plan for achieving the goals including a nutrition topic and recipe for each month; and

c. A summary of resources which will be used to obtain the nutrition information.

The nutrition education information must be easily understood by participants and be relevant to their nutritional needs and household situations. It should take into account specific ethnic and cultural characteristics whenever possible.

Nutrition education can include:

1. The nutritional value of CSFP foods, and their relationship to the overall dietary needs of the population groups served;
2. Suggested nutritious ways to use CSFP foods;
3. Information pertaining to special nutritional needs of participants and how these needs may be met;
4. Information pertaining to the importance of health care, and the role nutrition plays in maintaining good health; and/or
5. Direction regarding the importance of the use of the foods by the participant, and not by another person.

ii. **Evaluation**

Agencies are required by regulation 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 professional determined by the State to be qualified to perform the evaluation procedure. Evaluations should be done annually and may be a random sample of the clientele. Keep surveys short if possible and to the point. Use a large font print size for easy reading.

Agencies are encouraged to work with their local MSU Extension representative to develop materials and presentations meaningful to the agency’s clientele.

iii. **Nutrition Education Resources**

*Commodity Food Network* – [United States Department of Agriculture](http://www.commodityfoods.usda.gov/). This USDA sponsored web page is the first ever one-stop Federal website that provides direct access to many of the resources available. USDA commodity Fact Sheets and the Food Safety Connection may be accessed through this page.

*Food and Nutrition Information Center* – [United States Department of Agriculture, National Agricultural Library](http://fnic.nal.usda.gov/). This site is a clearing house of nutrition information. Many of the materials are in easy-to-read formats with large print.
Michigan State University Extension – Michigan State University Extension
http://www.msue.msu.edu/portal. Click on Health & Wellness for a variety of nutrition, health, and food safety materials.

National Diabetes Education Program – National Diabetes Education Program
http://www.ndep.nih.gov/. This site provides information on diabetes control. Many of the materials are offered in Spanish and various Asian languages.
Section 4: Ordering and Receiving USDA Foods

A. Food Ordering Overview and Procedures

Agencies control their inventory by following sound ordering procedures. MDE and local CSFP agencies order USDA Foods utilizing the Web Based Supply Chain Management (WBSCM) system. WBSCM provides information on what USDA Foods are available, possible ship dates, and the last date to place an order. USDA food can be received as a direct shipment, a multi-food order shipment, or through a transfer from another agency. In the event an agency experiences a change in administrative staff that are responsible for ordering USDA Foods in the WBSCM system, MDE must be notified and if necessary provide training on the use of the system.

Direct Shipments are deliveries of a single USDA food item from a vendor. Most USDA food orders are placed quarterly for most direct-ship food items. At a minimum, an agency must accept a quarter of a truckload for a delivery. All agencies are encouraged to order direct shipments whenever possible because this method of delivery is generally the most cost effective way of receiving USDA Foods. This method of delivery may require an agency to split a full truckload of product between one or two other agencies. The maximum number of drop off locations for a truckload of USDA food is three. Once the food is purchased, the agency can request to divert the shipment to another location if MDE is contacted at least 48 days prior to the requested delivery date. For example, if May 31, 2017 is the requested delivery date, MDE needs to be contacted by April 12, 2017 to complete the contract amendment that will be submitted to USDA in order to have the shipment diverted to the new location.

Multi-food Shipments are available when less than a quarter of truckload is needed for a USDA food group. A local agency may place varieties of food items monthly in WBSCM for a delivery to be made by an assigned delivery date. This type of delivery method is geared toward agencies having smaller caseloads and minimal warehouse space. It allows agencies to use a multi-food delivery when their inventory is low and they need a specific USDA food item to fulfill monthly food package requirements.

Once the food is received, transfers of USDA Foods from one local agency to another must be requested in writing by fax or email to MDE. Transfers are used when a USDA food item is needed to complete the food package before the next scheduled USDA delivery or if a dated product, such as cereal, needs to be distributed quickly by another agency before the expiration date. MDE must be notified of any inter-agency transfers as part of the inventory process.

CSFP agencies place orders in WBSCM for either a direct shipment from a USDA food vendor (1/4 truck load or more) or multi-food shipments from the USDA contracted warehouse. USDA has assigned the Syracuse warehouse in the state of New York as Michigan’s multi delivery warehouse.

Most direct-ship food items (milk, cereal, rice, pasta, peanut butter, dry beans, chicken, fish, juice and cheese) are ordered quarterly. IDIQ fruits and vegetables are ordered annually. Multi-food shipments are available to agencies on a monthly
basis. Agencies must place a multi order at least 8 business days prior to its scheduled delivery date if needed.

USDA recommends that warehouses maintain no more than a three (3) month supply of any one commodity group. On-line guidance to place orders for USDA Foods is available on the WBSCM website. Individuals authorized to place orders must have a secure login and password. Login and password information is not to be shared with other individuals for security reasons.

B. Procedures to Accept Deliveries
Delivery appointments for direct shipments are made at least 24 hours in advance by a dispatcher for the trucking firm. Before scheduling a delivery, warehouse staff must verify that the USDA food is being delivered to the correct location with a WBSCM generated Advanced Shipment Notification (ASN). This does not apply to the transferred products. Only the agency who placed the requisition will receive ASN. Warehouse staff need to verify the shipment with the monthly order status report before accepting the delivery appointment.

Agencies receiving a multi-food shipment have preset delivery dates with the contracted warehouse. ASNs are not generated for a multi-food delivery. Agencies must print their Multi-Food Requisition Reports from WBSCM to verify their shipments. USDA does not require the trucking firm to call your warehouse prior to the delivery.

Do not unload a truck unless you are certain that the delivery belongs to your agency.

All shipments must be carefully checked and all damage or shortages/overages must be documented in WBSCM within 2 calendar days after delivery.

If your agency is the last drop on a direct shipment and there is an overage (additional food on the truck beyond your order), please take possession of the food and contact MDE immediately to report the excess food. It is most likely this overage is the result of an error at a previous drop and belongs to another agency in our state. The other agency will be responsible for the transportation and storage costs involved in the transfer of the food back to its agency.

C. Disposal Authorization
Disposal of damaged USDA foods must be approved by MDE prior to disposal. The MDE Disposal Authorization Form must be completed for food losses.

USDA’s FNS Instruction 410-1, Non-Audit Claims – Food Distribution Programs indicates that States must:

1. Pursue a claim on any loss in which the value of the food exceeds $500
2. Transmit the claims action to the USDA Regional Office (MWRO), fully documented, after losses from any one distributing agency, warehouse, carrier, or other entity reach a cumulative total that exceeds $100,000 during the fiscal year; and
3. Make on-site reviews where significant or frequent losses occur. The Instruction prompts states to take action on losses on a regular basis. Disposal Authorization forms must be submitted with the monthly FNS-153 Report.

D. Warehousing Policy

i. Facilities
Storage facilities that handle, store, and distribute donated foods shall obtain all required Federal, State, and/or local health inspections and/or approvals and these must remain current. Facilities must be structurally sound and provide protection from the elements and extremes of temperature.

Storage facilities shall:

a. Be sanitary and free from rodent, bird, insect and other animal infestation, best achieved by contracting with a professional service for effective pest control.
b. Have safeguards against theft, spoilage, and other loss.
c. Maintain foods at proper storage temperatures.
d. Recommended temperature levels (Fahrenheit) are:
   i. 50º to 70º range for dry storage areas; and
   ii. 36º to 40º range for refrigerated storage areas
   iii. 0º or lower for frozen storage areas

e. Reliable thermometers must be provided to insure that proper temperatures are maintained. Temperature logs must be maintained on coolers and freezers.
f. Proper ventilation is an important factor in protecting foods. Use fans to improve circulation and reduce temperatures if necessary.
g. USDA foods must be stacked and spaced in a manner that allows easy identification at a distance of at least 24 inches. This will also facilitate accurate and quick counting.
h. Storage requirements for USDA Foods
   i. 6 inches off the floor on pallets
   ii. 18 inches away from walls
   iii. 2 feet from the ceiling
i. USDA Foods must not be stacked to a height that would create unstable pallets, thus damaging product on the bottom, or that would endanger the food handlers.
j. Take other protective measures as necessary to ensure safety for food handlers, and the security and condition of USDA foods.
k. Do not exceed a three (3) month supply of any USDA food group.

The Michigan Department of Agriculture and Rural Development (MDARD) is the state agency responsible for the licensing of food establishments that store and distribute prepackaged food. Warehouse staff must work with its regional MDARD office to insure compliance with the most current Michigan Unified Food Law.
ii. **OSHA Regulations**  
Warehouses must follow the most current Occupational Safety and Health Administration (OSHA) standards for forklift operation as well as other heavy equipment.

Employers are required to implement a training program that includes general principles of safe truck operation, site-specific information, and an evaluation of the employee’s (operator’s) knowledge and performance in operating the forklift. Its purpose is to reduce the number of injuries that occur as a result of inadequate operator training.

In Michigan, the Department of Licensing and Regulatory Affairs (DLARA), has resources available to help meet training requirements. Agencies should contact DLARA at 517-322-1809 to request services for training and technical assistance from the Consultation, Education, and Training (CET) Division.

iii. **Inventory Controls**  
Each agency must complete a physical inventory of all USDA food at the end of each month or after the last day of distribution for that month. Guidelines to produce an accurate monthly inventory and maintain optimal inventory control include:

Use Pallet Labels. USDA food must be labeled with:
- Product name
- USDA material number
- Date the product was received
- Best if used by date/Expiration date
- Pack date of the product
- Number of cases on the pallet
- Number of units in each case

Follow First In, First Out (FIFO) principles to ensure USDA foods are distributed well before the expiration or "best if used by" dates.

First In, First Out (FIFO) Principles:
- When planning the monthly distribution menu, use the item in each USDA food group with the oldest pack date first, even if the item was received after items with a later pack date.
- Pack date takes priority over date received.
- USDA Foods received on multi-food shipments often have an older pack date than direct-ship USDA Foods. Contact MDE immediately if any products received from the multi shipment have expired/will expire within 2-3 months. MDE will report this information to the USDA for quality control purposes of its national contracted warehouse.
- Organize USDA Foods by food group and if possible arrange in the same order as the FNS-153 Report.
iv. Theft Prevention
A well-organized warehouse eliminates the opportunity for theft and makes it easier to identify missing food. Warehouses must be secured with reliable lock systems. Electronic alarm systems are preferable.

Consideration should be given to the placement of certain more desirable food items such as peanut butter, canned chicken, and cheese. Do not make it easy for visitors (packers, volunteers, and staff) to walk off with food items.

Agencies must have tracking procedures that document:

1. The number of pre-packs sent to each site;
2. The number of client signatures indicating receipt of USDA foods at each site, and;
3. The number of undelivered pre-packs returned to the warehouse.

The number of pre-packed packages sent to a site should equal the number of signatures plus the number of returned pre-packs. USDA Foods in undelivered packages or food items declined by clients must be returned to the inventory.

v. Damaged/Mishandled Food
Product damage discovered during delivery should be reported in WBSCM.

Product damage hidden until pallets are dismantled or discovered as cases of food are opened must be reported to MDE. The agency may be directed to complete an MDE Complaint Form available on the MDE Food Distribution website. The complaint form must be used to report USDA Foods that are damaged, out-of-condition, or have a quality problem. Be as specific and thorough as possible and provide pictures of the damaged product.

- Incidental product damage during pre-packing and/or distribution can be avoided and must be an on-going concern to all agencies.
- Food loss due to carelessness expends valuable resources and may require replacement or repayment for lost product.
- Pre-packing lines must be set up in a secure manner that prevents product damage.
- Agencies must impress on volunteers and staff the importance of handling the USDA Foods with care.
- The staff assigned to unloading trucks and moving inventory in the warehouse need to handle USDA Foods responsibly.
Section 5: Record Keeping and Reports

All records must be retained for a period of three (3) years from the end of the fiscal year to which they pertain plus the current year, or until all open audits or investigations are closed and permission to destroy is received.

A. Reports

i. FNS-153 Report

The FNS-153 is an inventory and participation report that must be filed with MDE monthly. The FNS-153 is the primary means of communication among local CSFP agencies, MDE and USDA. The local agencies’ reports are compiled by MDE into one monthly FNS-153 report submitted to USDA. Local agencies are required to submit their FNS-153 to MDE by the 10th of the month after the activity occurred, which allows MDE to meet the USDA deadline for submission of the consolidated state report. It documents:

a. A summary of participation data by category;
b. Receipts and transfers of individual USDA Foods;
c. The current physical ending inventory; and
d. Distribution accuracy by tracking of over and under issuance.

Supporting documentation must accompany the FNS-153. This includes:

a. Losses and Gains Report. This report indicates commodities donated to pantries or documented on the Reconciliation columns on the FNS-153 as a positive or negative number (over/under inventory)
b. Disposal Authorization Form
c. Transfer Authorization Form
d. Explanation of Positive or Negative Reconciliation in the Remarks section on third page of the report.

The fourth page of the FNS-153 report is a management tool for agencies. Large numbers in the Over/Under Issuance column should alert program managers to possible problems with distribution procedures. The number of distributions in the Inventory on Hand column provides guidance for determining USDA food ordering needs when distribution takes place monthly.

The FNS-153 must be reviewed and signed by an agency official other than the one who prepared the report.

ii. FNS-191 Racial/Ethnic Group Participation Form

USDA requires State agencies to annually submit data on the racial/ethnic categories of persons receiving CSFP. Local agencies collect the requested information on the client’s application. Data is reported for the distribution occurring in April each year. The forms for reporting data are provided by USDA. The completed form is due to MDE by June 1st annually.

B. Application/Agreement

The Application-Agreement is renewed each fiscal year electronically on the Michigan Electronic Grants System Plus (MEGS+) system. Agencies indicate the
sites providing client certification, food distribution schedules, and food storage requirements. Agencies must upload their Distribution Schedules, Nutrition Education Plans, and other required information for the new Fiscal Year directly to the application system.

C. Monitoring Requirements
   i. State of Michigan Reviews
      MDE conducts a review of each agency’s program at least once every two (2) years. The review includes on-site visits during distribution, warehouse inspection (if applicable), and a program management evaluation that includes a financial review. Agencies are required to correct deficiencies through corrective action within a reasonable amount of time.

      - MDE monitors food inventories through the monthly FNS-153 and the food ordering procedure.
      - Technical assistance is available upon request to agencies with new program personnel or when help is needed for problem solving or implementing a new system.

      USDA conducts a Management Evaluation (ME) of the state operation every two (2) or three (3) years. Part of the ME process includes visits to local agencies.

   ii. Local Agency Review of Sites
      Local Agency CSFP managers are required to monitor their own operations by reviewing each of their distribution and certification sites at a minimum of once every other year. Aspects that should be evaluated include:

      a. Certification procedures;
      b. Distribution methods;
      c. Effectiveness of site in meeting the needs of the service area;
      d. Civil rights compliance; and
      e. Food safety.

      MDE sponsors meetings on a regular basis throughout the year for local CSFP agencies. All CSFP managers or their representatives are required to attend. These meetings provide a forum for sharing successful operational tips among the local agencies and for MDE to present current program concerns, procedures, and improvements.

D. Unusual Incidents
   It is recommended that agencies record all unusual incidents involving clients, volunteers, or program staff so that adequate documentation will be available in the event of controversy or litigation. No matter how small an incident may seem, put the particulars of the event in writing, sign, and date. If feasible, have both parties involved in the incident and a witness, date and sign the document. Documentation of these incidents should be maintained on file at the local agency.
Section 6: Volunteers

A. Recruiting Volunteers
- Outreach activities can be an effective way of locating volunteers.
- Volunteers provide critical support for the operation of the CSFP.
- Recruiting, training, and retaining volunteers are ongoing challenges.

There are a variety of sources where recruiting may be successful, including but not limited to:

- Corporate/business volunteers
- Client volunteers
- The Salvation Army
- Juvenile detention centers
- Word-of-mouth
- High school or college student groups
- Churches
- Community groups such as the Lions Club and Kiwanis.
- County Sheriff’s Department. They may refer individuals with community service obligations to the agency.

B. Training Volunteers
Volunteer services may be used in a variety of ways. The type and length of training depends on the activity they will perform. It is recommended that local agencies have a procedures handbook to guide the orientation of volunteers.

- All volunteers should be given a brief overview of CSFP.
- Relay to volunteers the value of their contribution to the success of the program in their community.
- Training must include an annual, documented session on Civil Rights responsibilities.

Volunteer Training Notes for Specific Tasks
Pre-packers should be trained on:

1. Who the products are for (people like their grandparents),
2. Why it is important that all of the required items must be included in the pack (good nutrition helps maintain good health), and
3. The importance of careful food handling (it is NOT free food).

Assistants at the site distributions must be friendly and treat clients with dignity and respect. (Just as they would want to be treated).

Intake workers must only be the most experienced and trusted volunteers. Confidentiality must be maintained as client information is not part of the public domain.

C. Volunteer Appreciation
CSFP volunteers may not receive CSFP foods unless they are eligible. Some volunteers might feel that they deserve some of the food as a way of thanks for their hard work and loyalty.
All of the following are acts of appreciation:

1. Present award certificates
2. Thank them after every distribution
3. Send written thank you letter to their organization
4. Put posters up at the sites stating the community’s appreciation of their help

Section 7: Civil Rights

A. Requirements
CSFP is open to all eligible persons regardless of race, color, national origin, sex, age, and disability.

The current USDA nondiscrimination statement must be included, in full, on all materials that are produced about the program for public information, public education, or public distribution. Your organization will provide you with the current nondiscrimination statement as part of your training.

An “And Justice for All” poster, Form AD-475C, must be prominently displayed at all sites during certification and USDA Food distribution. Posters are available free of charge from USDA or by request to MDE.

B. Training
A Civil Rights training must be completed and documented each year by each agency staff or volunteer for people involved in all levels of the CSFP distribution with program participants. Forms of documentation include staff/volunteer signatures, completion of training documents; online certificates, meeting agenda and sign in sheets, signed civil rights checklist.

C. Confidentiality
When distributing CSFP, staff and volunteers are required to protect participant information. Confidentiality of client information must be strictly observed. This means no discussion of client’s identities or other personal information outside of job-related needs.

D. Civil Rights Complaints
Civil Rights Complaints - Those wishing to file a discrimination complaint can do so at: Link to: USDA, Office of the Assistant Secretary for Civil Rights, Discrimination Complaint Filing or at any USDA office or call (866)632-9992 to request the complaint form.

E. American Disabilities Act
American Disabilities Act (ADA) – Under Title III, no individual may be discriminated against on the basis of disability with regards to the full and equal enjoyment of the goods, services, facilities, or accommodations. More ADA information can be found at: Link to Americans with Disabilities Act of 1990, as amended.
F. Day of Distribution - Civil Rights Training

Many agencies work with volunteers that help on an occasional basis (for example, volunteering once a year through their organization or infrequent availability due to personal schedules). These volunteers, along with regularly scheduled volunteers, make up a valuable part of our food distribution efforts.

The varying personal schedules and levels of involvement in food distributions of volunteers may affect their availability for training.

Regulations require Civil Rights training for volunteers and staff. The Michigan Department of Education (MDE) requires agencies to provide appropriate training based on a staff member and/or volunteers level of involvement with program participants.

Administrative staff, distribution site managers, and other staff that oversee intake and food distribution are required to receive Civil Rights training annually. This training may include the use of MDE training materials, such as the Online Civil Rights Training module, Civil Rights PowerPoint Presentation, certification as proof of training, and documentation of the actual training.

Volunteers that help on an occasional basis may require specific Civil Rights training that will address interaction with participants on the day of distribution. This training would be less in-depth and provide basic Civil Rights information.

“Day of Distribution” Training must inform and direct volunteers how to follow Civil Rights requirements during distribution. The six topics that must be covered are:

1. Respect for all participants regardless of race, color, age, sex, nationality, gender, and disability. Equal treatment of all participants.
2. Confidentiality when dealing with participant information or participation in program.
3. No reprisal or unfair treatment of any participant for any reason.
4. How to handle a complaint-Let the person in charge or their designee handle it.
5. How to handle language needs-Let the person in charge or their designee handle it.
6. Who to report to if assistance is needed during distribution.

By covering these topics, an occasional volunteer has the information needed for the day of distribution. This training is to be provided before the start of distribution and must include a copy of the topics covered in writing so volunteers may refer to it as needed.
Section 8: Financial Management

A. Administrative Funding
Administrative funding is awarded to agencies for the storage, handling, and distribution of donated food. These funds awarded may be used for items and activities listed below.

B. Allowable Expenditures
Agencies are reimbursed based on the dollars made available by USDA and as justified by costs. As indicated in USDA regulation 7 CFR, Part 247.25, allowable costs include:

1. Advertising - The cost of advertising for the purpose of public outreach of distribution sites and schedules is allowable.
2. Building Rental/Utilities - The cost of rental facilities for office space and/or food storage associated with donated food distribution and storage is allowable. Additionally, the cost of utilities, pest control, and janitorial services used in the operation of the program is also allowable. Facilities rental and costs associated with utilities, pest control, and janitorial services must meet criteria outlined in contract and the cost of each shall be prorated in direct proportion to the space being utilized.
3. Accounting – The cost of establishing and maintaining and accounting system and well as the cost of an independent audit are allowable.
4. Equipment – The cost of equipment necessary to perform donated food distribution is allowable when preapproved by MDE. Materials and office supplies including but not limited to postage and printing are allowable as long as they are directly related to the donated food program. Approval by MDE is required for any equipment or repairs costing more than $5,000.
5. Insurance Expenses – The cost of insurance coverage for the donated food program is allowable.
6. Compensation for Personnel – Salaries and fringe benefits for employees directly involved with CSFP are allowed to receive reasonable compensation that is prorated in the direct proportion to the percentage of time spent involved with the donated food program. Any expenditure for personnel services must be supported by records of payment as well as time and attendance records. These records must be available for examination including the number of employees, salary amount, and time involved in activities directly attributing the CSFP program. Employee compensation should be comparable to similar work in the area labor market.
7. Transportation – Expenses for freight, cartage, or delivery directly associated to the handling of donated food are allowable.
8. Training and Education – In service training and meetings of agency personnel and volunteers is allowable as long as it directly benefits to the donated food program.
9. Travel – Program related travel for volunteers and staff is allowable at the agencies prevailing rate of reimbursement.
C. Capital Purchases
Capital expenditures with a cost of $5,000 or more must be approved prior to purchase. The agency must request in writing permission to purchase the item(s) and provide documentation of three (3) bids. These purchases require approval from MDE.
Section 9: Glossary of Terms

There are many terms used in association with the distribution of USDA Foods through The Commodity Supplemental Food Program (CSFP). Please read and refer to the list of terms below as you become familiar with the distribution of USDA food.

**Agency:** This is the organization that oversees your site’s involvement in CSFP.

**American Disabilities Act:** Under Title III of the American Disabilities Act (ADA) it states that no individual may be discriminated against on the basis of disability with regards to the full and equal enjoyment of the goods, services, facilities, or accommodations. More information about the ADA can be found here: [Link to: Americans with Disabilities Act of 1990, as amended](#)

**Caseload:** The term “caseload” refers to the number of people the agency may serve on an average monthly basis from October 1st through September 30th. For example, an agency could be assigned a caseload of 150, meaning they are expected to distribute to 150 program participants.

**Civil Rights:** The basic rights that all people have. All people are to be treated in a kind, courteous manner that guarantees they receive the same level of treatment and service as anyone else. All staff and volunteers that work directly with the program participants must receive annual training.

**Confidentiality:** The expectation that personal participant or agency information is kept private and not to be used or shared outside of your work with CSFP.

**Distribution:** Handing out USDA food to participants. This requires documentation of the food reaching the intended participants. Participants must sign for USDA food at distribution.

**Fiscal Year (FY):** Twelve (12) month time period used for accounting and reporting purposes. The fiscal year for CSFP is October 1 - September 30.

**FIFO:** An inventory control practice that means “first in, first out”. Following this practice helps to ensure that food is distributed in a manner that provides fresh product to participants and helps eliminate spoilage and waste.

**Food Pantry:** A non-profit organization that provides donated food in sufficient variety and quantity to those in need. A pantry must maintain regularly scheduled hours and may have both food and non-food items available for continual distribution.

**Income:** This refers to all types of funding a participant may receive. Section 5, part K of this manual provides lists of what can or cannot be counted as income.

**Income Guidelines:** Annual information that determines appropriate levels of income by the size of household. This information is used to determine if a participant qualifies for CSFP.
**Intake**: CSFP participants are required by regulations to provide specific information when they enroll in CSFP. This includes age, residential and financial information.

**Monitoring Visits**: These are regular review visits from either the Agency or State. Sites are observed to ensure distribution policies and procedures are being followed.

**Nondiscrimination Statement**: The written description of the protection of all people in regards to their rights. It lists protected groups and describes how to file a complaint if rights are violated. The “And Justice for all” poster contains this information and must be posted in a publically visible location during distribution.

**Outreach**: An activity of providing services to populations who might not otherwise have access to those services. Effective outreach promotes the program and considers the best ways to inform potential program participants in the service area.

**Participant**: A person that enrolls in CSFP. A participant is sometimes referred to as a recipient.

**Proxy**: Someone who has officially been given permission in writing to pick up CSFP food on behalf of another participant. This is commonly used by seniors to allow others to pick up food on their behalf.

**State Distributing Agency (SDA)**: Designation given to State Agency administering Food Distribution Programs.

**USDA Foods**: Food distributed by USDA Programs, including CSFP. USDA Foods were formally known as “commodities.”