

**Michigan Department of Education
The Emergency Food
Assistance Program**

**Program Manual for
Site Distribution
Staff and Volunteers**

Revised August 2017

THE EMERGENCY FOOD ASSISTANCE PROGRAM (TEFAP)

Program Manual for Site Distribution Staff and Volunteers

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SECTION 1: PROGRAM INFORMATION

Overview

The Emergency Food Assistance Program (TEFAP) is a federal program that helps supplement the diets of low-income residents by providing them with emergency food and nutrition assistance at no cost. Through TEFAP, the United States Department of Agriculture (USDA) purchases USDA Foods and makes it available to agencies for distribution.

Agreements

The Agency and the distribution location will have a signed agreement on an annual basis. Both parties will keep copies of the agreement for three years plus the current year.

SECTION 2: PARTICIPANT ELIGIBILITY

Eligibility Determination

Michigan allows for TEFAP participation based on the following:

- Need for emergency food assistance
- Participation in the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- Participation in the Commodity Supplemental Food Program (CSFP)
- Participation in the Family Independence Program (FIP)
- Participation in the Supplemental Food Assistance Program (SNAP)
- Households with children who receive free/reduced priced meals at their school through the National School Lunch Program (NSLP)
- Households that meet USDA income guidelines

Current income is determined by the income received by all members of the household during the month prior to application. For the purposes of TEFAP, a "household" is defined as a single individual or a group of related or unrelated individuals who are living as one economic unit and purchase and prepare food together.

Documentation

TEFAP regulations do not allow agencies to collect income documentation from program participants. Instead, individuals and families establish their eligibility for annual enrollment through self-declaration that they either participate in one of the above listed programs or meet the income guidelines. Each time a participant receives TEFAP, he/she must sign to self-validate that they meet the program requirements.

If the agency collects income information for other services and/or programs, forms must identify the information as "not required for TEFAP participation" or "optional."

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

Individual sites must refer to their overseeing Agency's procedure for TEFAP distribution. Agencies may use a self-declaration form or may use an electronic signature system that has been approved by the Michigan Department of Education (MDE).

Residency

Participants must reside in the State of Michigan for at least one day in the geographic area assigned to the distributing agency. Those who live outside of the agency's serving area **may** be served if the agency has sufficient product, but the client should be advised of the correct location for future reference. Residency is based on self-declaration. No identification is needed.

Staff and volunteers are encouraged to refer any homeless or disabled person to local social services agencies which may assist the individual with obtaining identification or other needed services.

SECTION 3: FOOD HANDLING

Site Food Storage

If food is stored at the site, storage facilities must be clean, climate controlled, secure from theft, and have adequate storage for USDA Foods. Food must be stored off the ground (at least 4 inches) and away from the wall (at least 18 inches). Refrigerated food must be kept in regularly maintained refrigerated units with temperature logs. It is the responsibility of the Agency and site to follow all food storage requirements.

Distribution Day Food Storage

If food is delivered to the site for only the day of distribution, food must be accounted for by the Agency and the site. USDA Foods must be kept in a manner that maintains temperature, as needed, and must be safeguarded against theft.

USDA Foods Complaints/Damaged Products

If a complaint regarding USDA Foods, including any damaged products, is received, the site should contact the Program Manager and detail the item(s) in question.

SECTION 4: DISTRIBUTION INFORMATION

Distribution of USDA Foods

Food products may be pre-packed or made available to participants through a client choice procedure. With client choice, participants may choose to decline food that will not be consumed by the household in a timely manner.

No USDA Foods available through TEFAP shall be sold or otherwise disposed of in commercial channels in any form. Volunteers may not take TEFAP foods unless they are eligible.

USDA Foods are distributed based on the size of the household, as shown below:

1-4 family members: 1 package
5-8 family members: 2 packages
9-12 family members: 3 packages

Participant Signature

Agencies must maintain accurate records of TEFAP distribution through client self-declaration signatures. Each client must sign the signature sheet at the time the food box is received. This serves as both a declaration that they are within the income guidelines and documentation of the receipt of USDA Foods. Failure to complete and maintain signature sheets in a timely manner can result in suspension of access to TEFAP foods for the Agency and/or their distribution sites. Electronic signatures are acceptable as approved by MDE.

Throughout this process, confidentiality of client information must be strictly observed. Discussion of client's identities or other personal information outside of job-related needs is not allowed.

Participant Proxy

Participants who may have difficulty obtaining their USDA Foods at normal distribution times may designate a proxy. It is recommended that proxies are determined during the application process. When a proxy picks up food for a participant, they are to sign their own name on the signature sheet and write "proxy" next to it.

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

- Present identification and a signed note or proxy form from the participant
- Previously designated proxy with identification

Use of TEFAP Foods in an Emergency

TEFAP requirements are not to be waived or modified by the site in the event of an emergency such as a natural disaster. Any variations from normal distribution must come from the Federal level and will be communicated to the site through the Agency.

SECTION 5: CIVIL RIGHTS

TEFAP is open to all eligible persons regardless of race, color, national origin, sex, age, or 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. The Agency will provide the current nondiscrimination statement as part of 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 the Agency or by request to MDE.

Training

A Civil Rights training must be completed **and documented** annually by all staff and volunteers who interact directly with participants. Forms of documentation include staff/volunteer signatures, completion of training documents, online certificates, meeting agenda and sign in sheets, and/or signed civil rights checklist. The Agency is responsible for training front line staff.

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 food distribution efforts.

"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, or disability. Equal treatment of all participants.
2. Confidentiality with participant information or program participation.
3. No reprisal or unfair treatment of any participant for any reason.
4. Complaints are to be handled by the person in charge.
5. Language needs are to be handled by the person in charge.
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.

ALL VOLUNTEERS MUST SIGN THAT THEY HAVE RECEIVED CIVIL RIGHTS TRAINING.

Civil Rights Complaints

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

Americans with Disabilities Act (ADA)

Under Title III, no individual may be discriminated against based on disability with regards to the full and equal enjoyment of the goods, services, facilities, or

accommodations. More ADA information can be found at: [Americans with Disabilities Act of 1990, as amended](#).^{iv}

Limited English Proficiency Plan

The Agency will provide resources in the event a non-English speaking participant applies to the program.

SECTION 6: OUTREACH

Outreach

The site should partner with the Agency to conduct outreach that includes the program name (TEFAP), the site's name, address, distribution dates, and hours of operation. Posters, pamphlets, and public service announcements, including newsletters, can be used to make potential participants aware of the availability of donated food. Word-of-mouth should not be the only method of public outreach. The USDA nondiscrimination statement must be on all printed materials.

The distribution of USDA Foods shall not be used as a means for furthering the political interest of any individual or party. Information unrelated to TEFAP may not be placed in or printed on TEFAP bags or boxes unless it's to educate participants about other government-sponsored programs.

SECTION 7: RECORD KEEPING AND REPORTS

Record Keeping

All records pertaining to TEFAP 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. The Agency will advise where the records will be kept, whether on site or at the Agency office. If kept on site, the records must be in a secure location.

Monthly Reports

Sites are required to submit monthly distribution reports to the Agency as described by the Agency. Reports should include number of cases (amount of food) delivered, number of participants, number of cases (amount of food) leftover, and any issues or unusual incidents regarding the distribution.

Monitoring Requirements

The Agency will conduct annual monitoring visits of distribution sites. Agency staff should provide sites with reasonable notice of the visit and information on the scope of the on-site evaluation. These visits offer opportunities for staff and volunteers to provide feedback on TEFAP product acceptability, distribution procedures, and suggestions for improvement. The Agency may also conduct unannounced visits, as needed.

MDE will conduct reviews as part of the required Agency review. These will be scheduled through the Agency. MDE may conduct unannounced visits if necessary.

Unusual Incidents

It is recommended that sites record all unusual incidents involving clients, volunteers, or program staff so that adequate documentation will be available in the event of controversy or litigation. The local Agency must be made aware of these incidents. Documentation of these incidents should be maintained on file at the local Agency.

SECTION 8: GLOSSARY OF TERMS

Agency: The organization that oversees a site's involvement in TEFAP.

Bonus: Bonus products come in addition to the entitlement dollars. There are no specific products/quantities/delivery dates as the products become available based on current market conditions. There is no additional administrative funds for bonus products.

Distribution: Handing out USDA Food to participants. This requires documentation of the food reaching the intended participants.

Entitlement: The total value of food grants the Agency may receive in a calendar year based on the assigned household allocation from MDE.

Household: A participant or group of participants. Participants can be related or non-related but are considered a household if they purchase and prepare food together. This term is the measuring unit for amount of distribution. For example, "130 households served."

Income: All types of funding a participant may receive. TEFAP does not allow the requirement or collection of participant income information.

Nondiscrimination Statement: The written description of the protection of all people regarding 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 publicly visible location during distribution.

Outreach: An Agency's active effort to publicize programs to its service area through advertising, events, and relationships with other organizations. The goal of outreach is to ensure a high level of program awareness and participation in the Agency's assigned area of service.

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

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

Self-declaration: A statement that shows a participant understands that they need to meet income requirements to be eligible to take part in TEFAP. Self-declaration places the responsibility for accuracy on the participant and removes verification responsibility from staff and volunteers.

Signature Sheet: The sheet that participants sign to declare they meet TEFAP income requirements and to show that they received TEFAP food.

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

ⁱ https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf

ⁱⁱ <https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer>

ⁱⁱⁱ <https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer>

^{iv} <https://www.ada.gov/pubs/ada.htm>