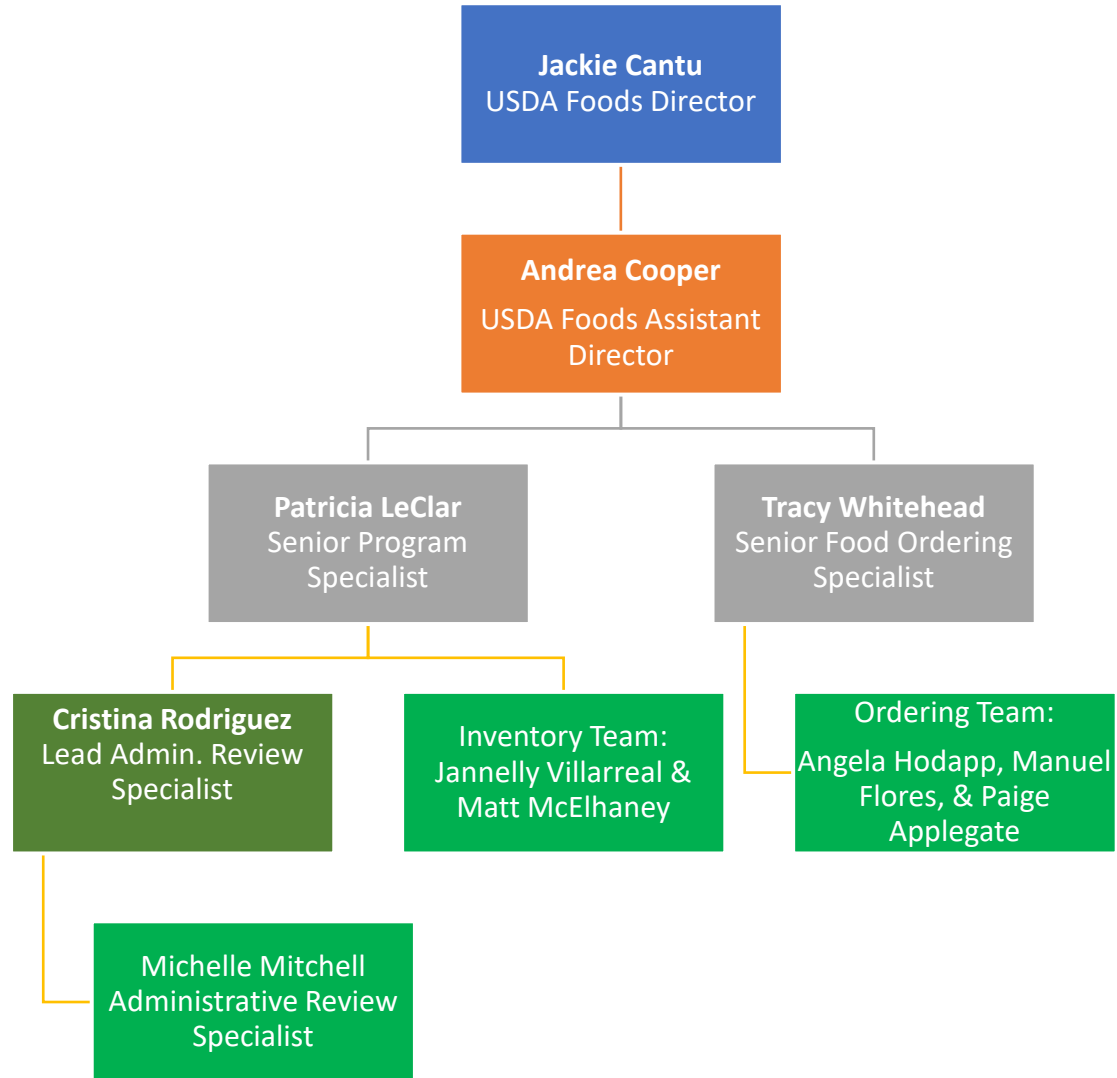




CSFP Training
Module 3:
**Setting Up
Distribution Sites &
Site Requirements**

Texas Department of Agriculture

Introduction: USDA Foods Team



Outline

I. TDA CSFP Structure

II. Training & Monitoring

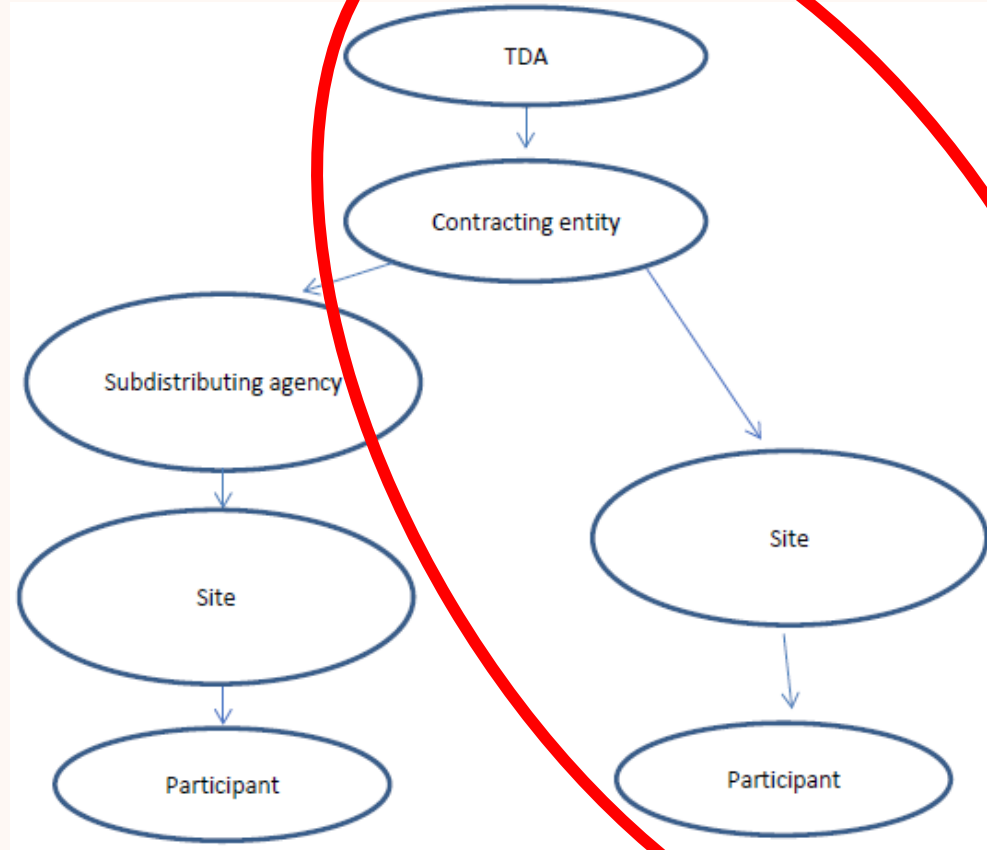
III. Distribution Methods

IV. Distributions

V. Notifications

VI. Other

TDA CSFP Structure



TDA CSFP Structure



An organization is eligible to participate in CSFP as a CE, subdistributing agency, or site **only if it is a nonprofit organization with tax-exempt status or a public agency.**



Nonprofit organizations must acquire and maintain tax-exempt status from the IRS either individually or part of a group ruling (i.e., 501c3, Church Qualifier)



At the initial application and at least annually afterwards, CEs must check the IRS Automatic Revocation of Exemption List to ensure that their subdistributing agencies and sites are not on the list. CE must document this.

TDA Structure

1

A site is any organization that will be responsible for distributing, transporting, or storing USDA Foods; or for certifying CSFP participants.

2

CE's must conduct a site visit to verify the site's ability to operate in full compliance with the requirements of the agreement it holds.

3

CEs execute the *Agreement Between Contracting Entity and Site* (Form H1501) with each site.

TDA Structure

Complete and maintain a CSFP site list, may add/delete as needed

Utilize the 'Site Information' Form H1503. CE's submit spreadsheet once a year via TXUNPS Contract Packet Renewal

Document Site Contact Information: Site Name, Hours of Operation, Type of Site, Address

***Check IRS for Tax-Revocation list**

TDA Structure

Texas Department of Agriculture

Commodity Supplemental Food Program (CSFP) Site Information

Form H1503
July 2022

This spreadsheet provides information about a renewing contracting entity's (CE's) sites or a new applicant CE's intend sites.

Contracting Entity									
Food Bank									
CSFP Program Contact Information									
CE Representative:	Cristina R.	Phone Number:	XXXXXXX	Email Address:	Crisina.Rodriguez@XXX				
Sub-Agency/Distribution Site Name	Physical Address	City	Zip Code	County	Site Representative Name	Phone Number	Days/Hours of Operation	Agency Type	Date of Last Verification of Tax-Exempt Status
Abiding Love Luthern Church	7210 Brush Country Rd. Austin, TX, 78749	Austin	78749	Travis	Rosa Hatfield	512-922-4883	Every Monday from 11:00 AM 3:00 PM	Certification, Distribution, Storage	5/8/2023
Alamo Recreation Center	2100 Alamo St. Austin, TX, 78722	Austin	78722	Travis	CTFB Special Populations Coordinator	512-282-2111	Third Friday from 11:00 AM 12:00 PM	Certification & Distribution	9/5/2023
Arbors at Creekside	1026 Clayton Lane Austin, TX, 78723	Austin	78723	Travis	CTFB Special Populations Coordinator	512-282-2111	First Tuesday from 12:00 PM 1:00 PM	Certification & Distribution	
Bastrop County Emergency Food Pantry	806 Fayette St. Bastrop, TX, 78602	Bastrop	78602	Bastrop	Sandra Dougan	512-303-0033	Second Tuesday from 9:00 AM 11:30 AM	Certification, Distribution, Storage	9/5/2023
Cambridge Villas Senior Living	15711 Dessau Rd. Pflugerville, TX, 78660	Pflugerville	78660	Travis	CTFB Special Populations Coordinator	512-282-2111	First Monday from 9:30 AM 10:30 AM	Certification & Distribution	
Caritas of Waco	300 S. 15th St. Waco, TX, 76701	Waco	76701	McLennan	Tammy Stevens	254-753-4593	Every Monday from 8:30 AM 3:00 PM Monday after the 2nd Thursday	Certification, Distribution, Storage	9/6/2023

Training & Monitoring

Training & Monitoring

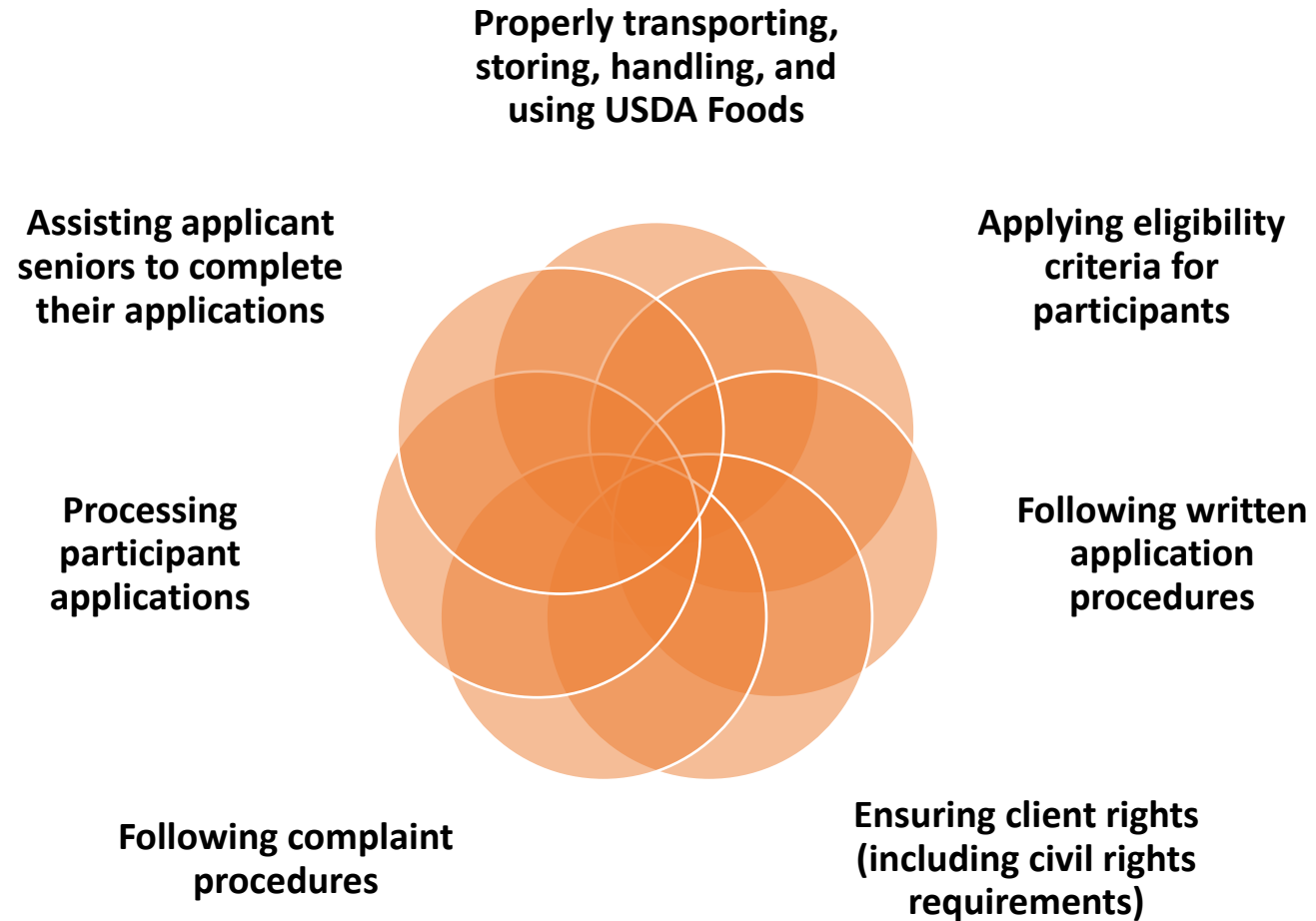


CEs and subdistributing agencies must train staff and volunteers before they initially assume any CSFP duty and each program year thereafter.



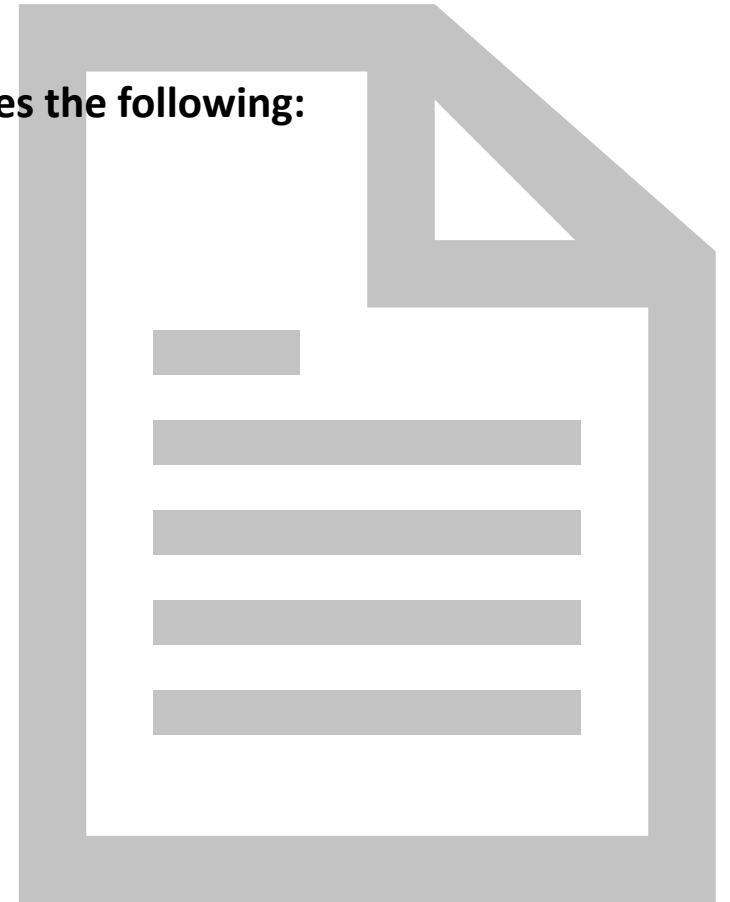
Annually, CEs must monitor their sites for program compliance.

Training Topics



Training Documentation

- **CEs must maintain a record of trainings and attendees (sign-in sheets) which includes the following:**
 - **Date of training,**
 - **Location of training,**
 - **Training topics,**
 - **Name(s) and signature(s) of attendees, and**
 - **Name of the trainer.**
- **CEs must retain this documentation with its program records.**



Monitoring

Review tool

- CEs must record and track compliance or operational issues on their compliance monitoring forms.
- CEs will create their own review document/tool
- TDA will review this document during the Administrative Review (AR)

Areas of noncompliance

- **Ensure program compliance**
- **Investigate reported problems.**
- **Determine whether to operate a site during the following program year.**
- **Verify and ensure proper use of USDA Foods.**



Monitoring

Postings

- Posted in a prominent area (AJFA Poster, Missed Distribution Poster)

Record Keeping

- Paper/electronic must be kept in a safe and confidential space

Storage space(s)

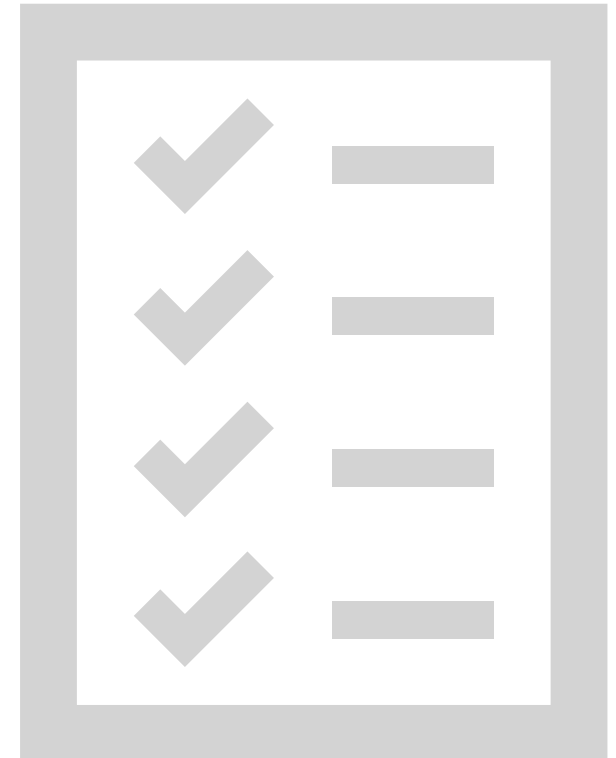
- Kept clean,
- Maintain Temperature logs
- Pest control

Adhering to nondiscrimination requirements

- Staff & volunteers must have current Civil Rights Training

Means-Testing

- Intake/Application forms, H1504 completed correctly
- Not requiring proof of income or residency
- Eligibility determinations & notifications



Distribution Methods

Distribution Methods

Main Methods:

- Distribution by CE staff (“CE Led”)
- Distribution by partner agencies
- Hybrid (CE led + partner agencies)

Home Deliveries

- CE
- Utilization of private companies (Door Dash)



Distribution Methods: CE Led



OPERATED BY CE STAFF
ONLY



CE CONDUCTS THE
ELIGIBILITY



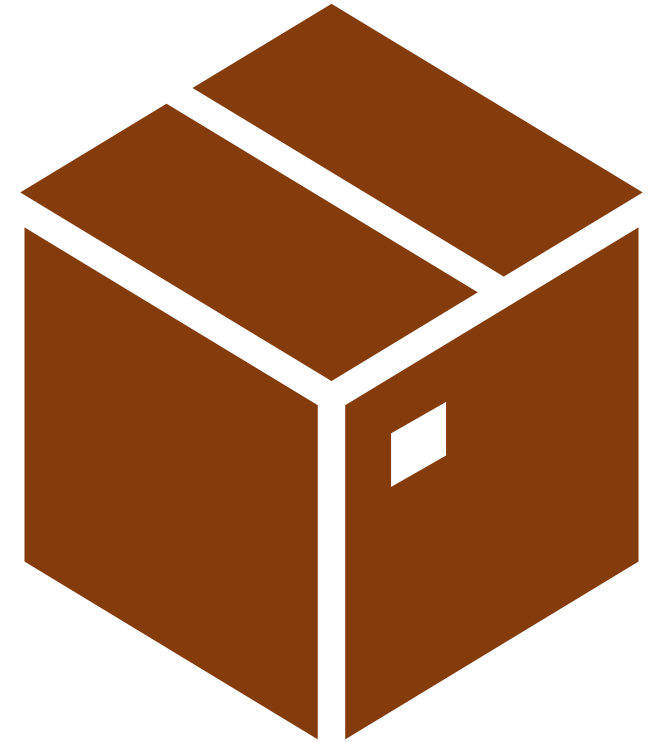
CE DELIVERS &
DISTRIBUTES THE CSFP
BOX TO THE SENIOR



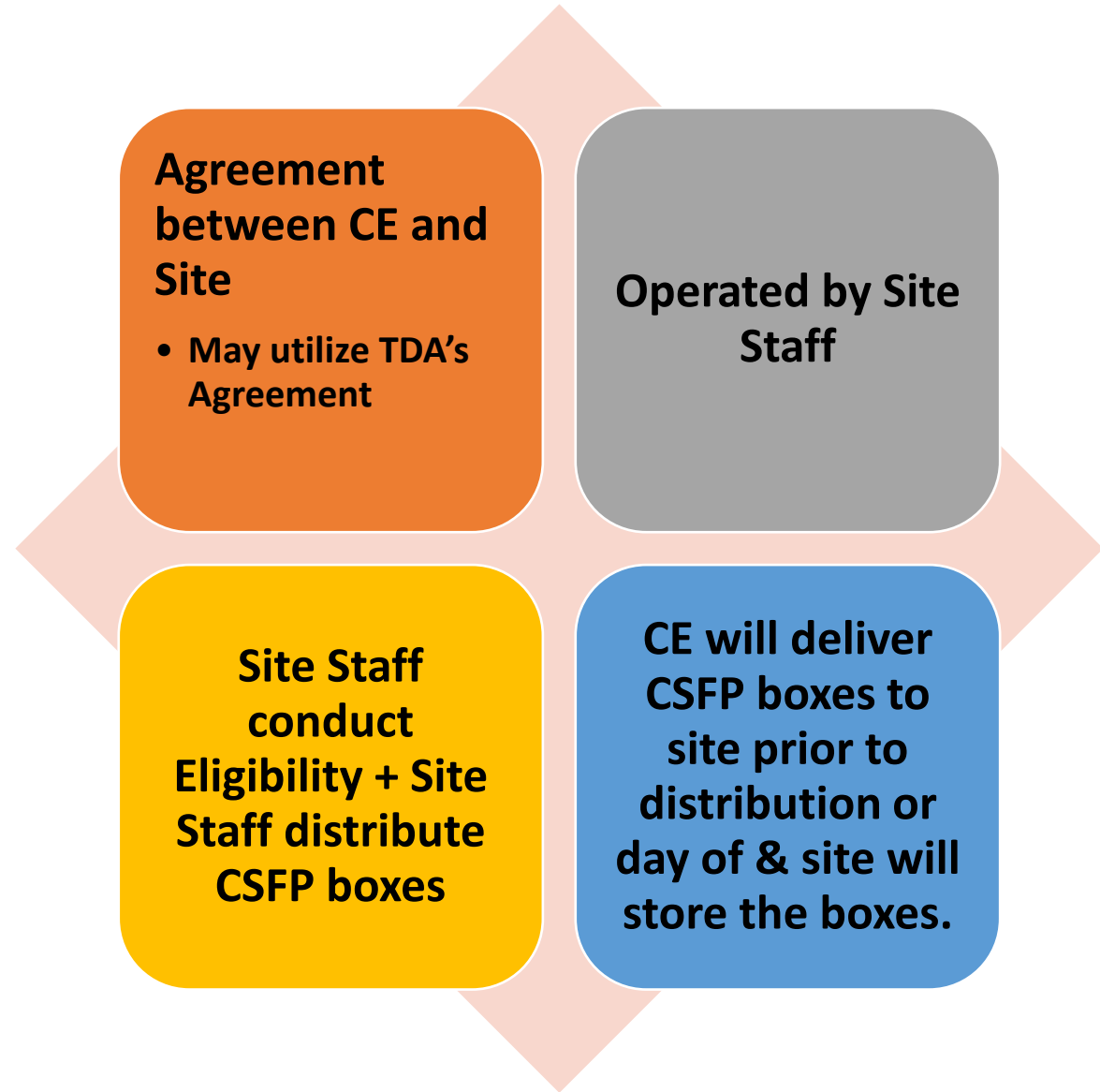
NO AGREEMENTS NEEDED
BETWEEN LOCATION & CE;
MAY UTILIZE MOU

Distribution Methods: CE Led

- CE may utilize a parking lot
- CE may conduct Drive thru distributions
- CE may utilize their food bank location
- CE may do a homebound delivery model



Distribution Methods: Partner Agencies



Distribution Method: Homebound Delivery by Private Company

CEs and site staff must not delegate major local responsibilities to the private company:

Private company may not conduct eligibility

May not make eligibility determinations for new CSFP participants

May not be considered proxies

Distribution Method: Homebound Delivery by Private Company

Revised 10/2022

Commodity Supplemental Food Program: Using Private Companies to Distribute CSFP Food Packages

The Texas Department of Agriculture has the discretion to allow Contracting Entities to utilize a for-profit company to provide home delivery of CSFP food packages, if certain conditions are met.

Agreements:

First, consistent with 7 CFR 250.4(c) and (d), an agreement or contract must be in place between the company and the CE which ensures that the delivery service adheres to all CSFP program regulations (see also 7 CFR 247.4).

At a minimum, a contract or agreement for these delivery services must require the company to provide:

- I. Safe storage and transportation of the foods in compliance with program regulations at 7 CFR 250;
- II. Verification of the identity of each CSFP participant through a review of the participant's, or proxy's, identification before issuing the CSFP food package, consistent with 7 CFR 247.10(b);
- III. All applicable records required by the state or local agency;
- IV. An assurance that the privacy and confidentiality of participant information will be maintained, consistent with 7 CFR 247.36; and
- V. Civil Rights training for delivery personnel.

Documents to submit to TDA:

- A copy of the agreement must be submitted to TDA prior to implementing this delivery model.
- A copy of the CE's plan of operation outlining the following:
 - *How CSFP foods will be transported to ensure food safety, to include how cheese will be kept cold,*
 - *How the participant data will be kept confidential,*
 - *How training will be provided,*



Distributions

Distributions



Senior box

Participants may receive one food package every month or CEs may issue Advance issuance where the senior may receive 2 boxes (bi-monthly)



Orderly Distribution

Participants have the responsibility to contribute to an orderly distribution.



No Fraud/Misuse

CEs, subdistributing agencies, sites, and participants must report fraud, misuse, or negligence.



Do not require:

May not ask seniors for fees, memberships, donations



No Barriers:

CEs or sites may not impose barriers in receiving CSFP Foods.

Distributions

Tracking

Site/CE staff must track & submit issuance numbers as part of the FNS-153.

Count

Site/CE staff must count leftover CSFP boxes & report to WH staff as part of the FNS-153.

Prevent

Prevent Dual Participation.

Check

Check Participant & Proxy Identification each time a participant picks up a CSFP box.

Record Retention

Maintain for three years from the end of that federal fiscal year.

Make available during ARs.

Distributions Reminders

Keep Cheese Cool

- Cooler, ice chest, etc.

Retroactive Distributions

- Not allowed

System

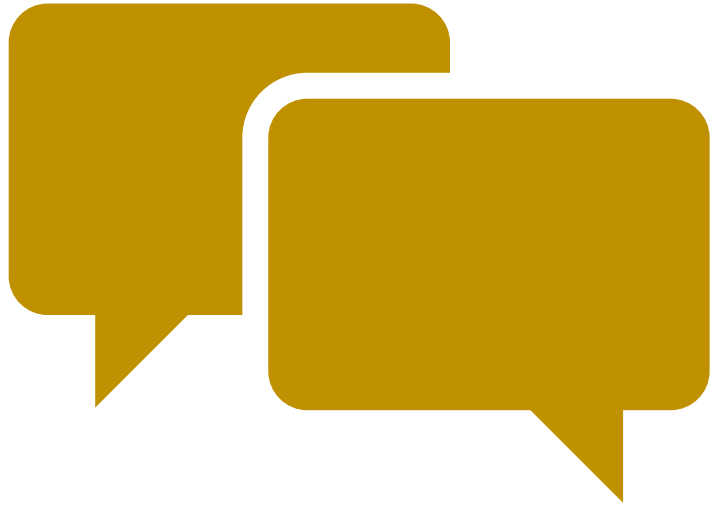
- Tracking and Reporting
- Electronic: Link2Feed, Oasis
- Paper

TEFAP & CSFP

- May conduct TEFAP & CSFP distributions at the same time

Refusal of CSFP items

- Recipients may refuse any USDA Foods they cannot use or do not want.
- Refusal will not affect eligibility.
- Refused items must be returned to CE and placed in inventory.



Questions

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.

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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

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Food and Nutrition Division
Nutrition Assistance Programs



Updated 11/14/2023
www.SquareMeals.org