

Frequently Asked Questions

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Food and Nutrition Division
COVID-19



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Frequently Asked Questions

DISASTER HOUSEHOLD DISTRIBUTION

Disaster Household Distribution (DHD)

1. What is Disaster Household Distribution (DHD)?

DHD is a less common form of USDA Foods assistance during disasters, emergencies, or situations of distress. It is intended to provide household-sized food items for home preparation when congregate feeding is not practical and normal commercial supply channels, such as grocery stores, have been disrupted, damaged, destroyed, or are unable to function. DHD is separate from ongoing distribution of TEFAP.

To use USDA Foods for DHD, the disaster must be a Presidentially-Declared Major Disaster or Emergency, or determined a situation of distress by the local authorities. **USDA approval is required** before TDA can implement DHD.

2. Is DHD an option for the state of Texas?

No. Approval for DHD expired June 30, 2020 for the Presidentially declared emergency for the COVID-19 Pandemic. TDA could apply for DHD under a new Presidential disaster declaration.

3. Is additional USDA Food provided for DHD?

No. CEs must use the TEFAP foods on-hand for DHD. In addition, regular TEFAP operation is expected to continue as best as possible during a Presidentially declared emergency situation.

USDA will replace TEFAP foods used for DHD under a Presidential declaration of a disaster or emergency. USDA has communicated that replacement food for the COVID-19 Pandemic will not be available for delivery until after September 2020.



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4. Are applications or intake procedures required for TEFAP and CSFP distribution?

USDA does not have waiver authority for program regulations under a Presidentially-Declared Emergency Declaration for TEFAP and CSFP. Specifically, federal eligibility requirements for these programs cannot be waived.

State TEFAP flexibilities granted:

- Signatures are temporarily NOT required from participants/proxies. Site Coordinators must still obtain other federally required intake criteria to document eligibility.
- Allowable distribution models for TEFAP:
 - Drive through
 - Home deliveries
 - Utilize proxies – no limit for # of individuals per proxy
 - Mobile distributions
 - Soup kitchens may provide “take-out” meals

CSFP flexibilities within regulation:

- USDA is encouraging bi-monthly distributions allowed by current regulations.
- Signatures cannot be waived. The following are allowable means for obtaining signatures:
 - Electronic signatures
 - Signatures obtained by mail



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- Over the phone, the CE staff member may sign on behalf of the applicant as an interim measure. Due diligence would need to be taken by the CE to obtain that signature at a later date.

5. Is the participant's signature required to designate or change a proxy?

Signatures are temporarily NOT required for proxy designation or change in CSFP and TEFAP. However, any proxy designation or change must still be requested in writing. To facilitate social distancing, the site may choose to accept a picture of a written note or the site coordinator may complete the documentation on behalf of the participant.

6. Is the participant's signature required for FMNP and SFMNP?

Signatures are still required, but CEs may accept them electronically or from the participant's proxy. Email and text messages are acceptable forms of electronic signature. The CE is still responsible for maintaining records of all signatures, including those submitted electronically.

7. Is face-to-face training required for FMNP and SFMNP?

The training of new farmers and the annual training of FMAs do not have to be face-to-face. Training may be conducted via phone or online so long as the medium allows for live questions and answers.

8. What social distancing flexibilities do FMNP and SFMNP operators have?

The following flexibilities are allowed within regulation for FMNP and SFMNP:

- CEs may mail vouchers if the CE has the participant's contact information. The CE's local WIC contact may be able to help contact participants.
- A participant may utilize a proxy to pick up voucher booklets and to redeem vouchers. A single proxy may be used for multiple participants.



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- Markets may limit the number of people allowed inside at one time.
- Markets may utilize a curbside pickup method to provide eligible foods.
- Participants may leave their signed vouchers in a designated place rather than handing the voucher to a person. The farmer or vendor may then prepare a package of produce for the participant or proxy to pick up at the farmer's market.

9. What social distancing flexibilities do TEFAP operators have for congregate feeding?

TEFAP operators approved to serve prepared meals may provide those meals in take-out containers to facilitate social distancing.

10. Is it possible to expedite TEFAP deliveries?

Expediting is dependent on vendor abilities. Please submit requests for expedited orders to matt.mcelhaney@TexasAgriculture.gov. TDA will consult with FNS/AMS to see if expediting is possible. All such requests must include the sales order numbers for the shipments.

11. Is it possible to reallocate National School Lunch Program (NSLP) inventory to other programs?

USDA allows State Agencies to reallocate NSLP foods to other programs. TDA is currently developing methods to implement this within the state TDA is most interested in reallocating foods with limited shelf life first. Entitlement will not be replaced in instances where food is reallocated to an alternate program.

Currently, a CE participating in NSLP may transfer inventories of USDA Foods to another entity when they are unable to utilize the product within the program year it was allocated or if it is close to expiring. [Refer to this guide for steps a CE must follow to initiate a transfer.](#)



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12. Should CSFP CEs continue to distribute within their base caseload assignment or can they exceed that limit due to COVID-19?

Food banks should continue to distribute CSFP food packages within their base caseload assignment to ensure inventories are properly maintained and eligible seniors can continue to receive their food package each month. CEs may need to utilize waitlists during COVID-19 to meet their base caseloads if participants do not pick up their food package.

13. In what situation is retroactive distribution allowed in CSFP?

USDA has approved TDA's waiver request for retroactive CSFP distribution for sites that had to close in August. CEs can apply for this waiver at <https://form.jotform.com/200835028837053>. Local agencies may distribute August CSFP food packages in September as retroactive benefits. Local agencies should make every effort to offer the August food boxes to recipients as soon as possible in September.

For sites issuing two-months of food packages bi-monthly, please note that retroactive distribution for August in September will count as a two-month distribution if provided with the September distribution. Therefore, the retroactive distribution could not be combined with a two-month distribution for September and October. However, if the August distribution is provided in early September, then the two-month distribution for September and October can be provided later in August.



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Financial Considerations

14. **Will administrative funds be provided for costs associated with foods received from the Families First Coronavirus Response Act (FFCRA) or the Coronavirus Aid, Relief, and Economic Security (CARES) Act?**

USDA did not allocate administrative funds separately for FFCRA or the CARES Act. Both provided the option to convert a percentage of allocated funds to administrative funds. TDA queried food banks to designate the administrative funding necessary to cover expenses.

15. **Can FFCRA or CARES Act funds be used to cover costs associated with TEFAP?**

If a CE opted to convert a percentage of FFCRA or CARES Act food funds to administrative funds, those administrative funds may be used for any TEFAP expense, including DHD, relating to the prevention, preparation, and responses to COVID-19 between the dates of March 27 and September 31.

Pursuant to 7 CFR §251.8(e)(1), CEs may use funds to cover the costs associated with the distribution of TEFAP Foods as well as foods secured from other sources if food is distributed through TEFAP channels. Direct expenses include the following, regardless of whether they are charged as direct or indirect costs:

- The intrastate and interstate transport, storing, handling, repackaging, processing, and distribution of commodities; except that for interstate expenditures to be allowable, the commodities must have been specifically earmarked for the particular State or eligible recipient agency which incurs the cost;
- Costs associated with determinations of eligibility, verification, and documentation;



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- Costs of providing information to persons receiving USDA commodities concerning the appropriate storage and preparation of such commodities;
- Costs involved in publishing announcements of times and locations of distribution; and
- Costs of recordkeeping, auditing, and other administrative procedures required for program participation.

Expenses billed do not have to coincide directly to the poundage receipt date to use funding from the FFCRA and the CARES Act.

16. What is the priority of use for FFCRA and CARES Act funds?

FFCRA and CARES Act funds should be spent before regular TEFAP funds for any valid TEFAP expenses incurred relating to the prevention, preparation, and response to COVID-19. Further, CARES Act should be spent before FFCRA. However, CEs may bill against FFCRA funding until CARES Act funds are distributed to TDA.

17. Can FFCRA and CARES Act funding be used to cover indirect costs?

Yes. A CE may bill for indirect costs, but the indirect costs should remain the same as how the CE previously utilized and calculated indirect costs for TEFAP. The costs should utilize a reasonable formula for determining the amount regardless of whether it is for direct or indirect expenses.

The CE should maintain documentation of costs in the same manner that the CE maintains other TEFAP costs documentation.

18. How do CEs claim allowable costs when TEFAP or TEFAP Trade Mitigation foods are used to assist with COVID-19?

TEFAP and TEFAP Trade Mitigation food may only be utilized in TEFAP distributions. Costs associated with the distribution of TEFAP and TEFAP



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Trade Mitigation food through TEFAP distributions during COVID-19 should continue to follow the current claiming processes for those programs.

Monitoring Requirements

19. Is TDA continuing to conduct administrative reviews?

Yes, TDA is conducting administrative reviews.

