**Idaho Commodity Supplemental Food Program (CSFP)**

**A United States Department of Agriculture Federal Program**

**State Plan**



**6305 W. Overland Rd, Suite #110,**

 **Boise ID 83709 (208)-334-3833**

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# Section I: Program Purpose and goals

## Program Purpose

Through the Commodity Supplemental Food Program (CSFP), the US Department of Agriculture (USDA) provides nutritious commodities to help State and local agencies meet the nutritional needs of low-income elderly people at least 60 years of age.

## Goals

The Idaho Commission on Aging (ICOA) will administer the program and The Idaho Foodbank will implement the distribution. The goals are to:

* Coordinate the food distribution to seniors who are within the 130% Federal Income Poverty Guideline.
* Refer other eligible person to other nutrition assistance programs.
* Reach 100% utilization of caseload assigned by the Food and Nutrition Service (FNS) for the Federal Fiscal Year.
* Serve individuals across the state where access to programs and services are limited, rural or are underserved.
* Provide nutritional education.
* Implement an eligibility process for seniors who meet the Federal Income Poverty Guideline.
* Develop a data collection system and reporting process.
* Identify warehouses that best serve the CSFP.
* Report data based on federal reporting requirements.

# Section II: Program Implementation

## Operation

The ICOA will enter into a written agreement with The Idaho Foodbank for the operation of the CSFP. The Idaho Foodbank is headquartered in Meridian, Idaho and is a member of the Feeding America network that provides services to all forty-four counties in Idaho.

Distribution sites will be selected by The Idaho Foodbank according to their community/service area poverty demographics, homebound delivery capabilities for elderly program recipients, past performance as a food pantry, adequacy and size of facility and proposed program staffing and/or volunteer levels. The Idaho Foodbank will primarily operate CSFP in areas that meet the federal income eligibility criteria with a concentration of low-income elderly. ICOA will develop performance measures and program evaluation to ensure that Federal and State requirements are followed.

## Financial Management

ICOA will provide funds to The Idaho Foodbank to defray the costs of program operations. These funds are subject to the availability and level of federal funding received. ICOA will reimburse The Idaho Foodbank for administration, storage, and distribution cost in accordance with a written agreement. The Idaho Foodbank is obligated to manage the program to fully maximize caseload levels; otherwise run the risk of losing funds and caseload.

The ICOA and The Idaho Foodbank agreement will contain stipulations that all federal funds made available to local agencies for CSFP be expended solely for program related purposes. Expenditures will be monitored during the annual review as well as throughout the fiscal year as deemed necessary by ICOA. The Idaho Foodbank must follow federal allowable costs as outlined in 7CFR Part 247.25, in addition to state procurement requirements.

The ICOA and The Idaho Foodbank will maintain a current property listing of CSFP equipment on hand.

The items will be described in a manner that is sufficient for identification purposes, including: (1) name and address of whoever has custody of the item, (2) acquisition date, (3) the cost, (4) whether the item was purchased new or used, (5) description of the equipment, (6) serial number or other ID number, (7) the source of funding for the equipment, (8) who holds the title, (9) percentage of Federal participation in the cost of the equipment, (10) use and condition, and (11) disposition data (if any) including the date of disposal and sale price of the equipment. [2 CFR 200.313(d)(1)]

# Section III: Responsibilities

## ICOA Responsibilities

* Administer the program.
* Communicate with USDA.
* Meet State and Federal financial, program, management requirements.
* Develop a CSFP review process that ensures that The Idaho Foodbank and its contractors comply with requirements.
* Establish a management review system to ensure that local agencies, sub-distributing agencies, and other agencies conducting program activities meet program requirements and objectives.
* Provide technical program guidance to The Idaho Foodbank.
* Provide FNS with following reports:
	+ SF-425, Financial Status Report.
	+ FNS-191, Racial/Ethnic Group Participation.
	+ FNS-153, monthly report with following information:

Number of program participants.

Receipt and distribution of commodities.

Ending inventories.

Quarterly cumulative amount of administrative funds expended and obligated and the amount remaining unobligated.

* Ensure compliance with federal audit requirements.

## Idaho Foodbank Responsibilities

* Order adequate quantities and varieties of USDA Foods for use in CSFP.
* Identify distribution sites that best serve CSFP eligible participants.
* Provide shipping, transportation, storage, and food distribution costs.
* Maintain commodity warehouse.
* Deliver pre-packaged commodity food and nutritional materials to eligible participants.
* Develop a CSFP approval process that includes, but is not limited to the following:
	+ Is a senior 60 years or older.
	+ Meets Federal Poverty Income Guidelines.
	+ Is an Idaho resident.
* Provide client outreach.
* Manage caseload.
* Create a waiting list for applicants exceeding the agency`s caseload level.
* Maintain accurate and complete records.
* Supply adequate insurance to replace the commodity product in the case of loss due to theft, fire, water, and negligence.
* Establish procedures for resolving complaints.
* Provide nutrition education and information on the availability of other nutrition and health assistance programs to participants. 7CFR part 247.5(c)(5)
* Provide following reports to ICOA:
	+ Monthly FNS-153 inventory report.
	+ Yearly FNS-191 racial and ethnic group report.
* Will attend one conference yearly, either ACDA or Best Practice Meeting in the Western Region, if available.
* Each single communication from IFB to FNS must include an ICOA program specialist.
* Present once a year in person or the CSFP to Senior Center Staff statewide for all six regions.
* Present at conferences that are facilitated and hosted by ICOA as requested.

**Assurances:**

To qualify for Federal financial assistance, an application must be accompanied by a written assurance that the entity to receive financial assistance will be operated in compliance with all nondiscrimination laws, regulations, instructions, policies, and guidelines.

A Civil Rights assurance statement must be incorporated in all agreements between:

* Federal and State Agencies (FNS Form 74)
* State agencies and local agencies or subrecipients
* Local agencies and subrecipients FNS Instruction 113-1, Appendix C

Section IV: State Plan Requirements

## Agency Identification

|  |  |  |  |
| --- | --- | --- | --- |
| **Agencies** | **Purpose** | **Address** | **Contact** |
| The Idaho Commission on Aging | State Unit on Aging Administers Program | 6305 W Overland Road, Boise ID 83709 | Program Specialist208-334-3833 |
| The Idaho Foodbank | CSFP Program Coordinator (Statewide) | 3630 E Commercial Street, Meridian, ID 83642 | CSFP Program Coordinator208-602-4750 |
| The Idaho Foodbank | Distribute Program, as Local Agency | 3630 E Commercial Street, Meridian, ID 83642 | Southwest Idaho Distribution Manager208-577-2699 |
| The Idaho FoodbankLewiston | Distribution Warehouse | 3331 10th StreetLewiston, ID 83501 | North Central Idaho Branch Manager208-746-2288 |
| The Idaho FoodbankPocatello | DistributionWarehouse | 555 S 1st AvePocatello, ID 83201 | Eastern Idaho Branch Manager208-233-8811 |
| The Department of Health and Welfare | Information exchange to prevent Dual Participation and to support outreach. | PO Box 38720, Boise, ID 83720-0036 | Program Manager208-334-5733 |

## Income and Eligibility Standards

For seniors sixty and over, a household income at or below 130 percent of the Federal Poverty Income Guidelines will be used. The participant will verify the income by self-declaration.

No household shall be permitted to participate in CSFP at more than one distribution site at the same time. Each participant and new applicant shall be advised that dual participation is prohibited. All applicants must sign a statement on their application form that they understand Dual Participation in accordance with 7CFR part 247.19.

Each year the Idaho Foodbank will incorporate any changes to participant’s household income based on the Federal Poverty Income Guidelines issued by the Department of Health and Human Services.

Application forms will be available through The Idaho Foodbank and staff will determine eligibility and certification of applicants. Eligibility criteria and income guidelines for participation shall be in accordance with those established by USDA – Food and Nutrition Service. Each applicant will be provided with a notice of eligibility or denial to participate in the program.

The certification periods for participants may not exceed 3 years in length. On a yearly basis, The Idaho Foodbank must complete a verbal certification and can allow the participant to continue if the following conditions are verified:

* The person’s address is current with program records.
* They remain interested in receiving program benefits.
* The local agency has sufficient reason to believe that the person is still eligible for services (living on fixed income).

For currently certified participants, three-year certifications must be implemented on the date that their current certification period expires, provided that such participants continue to meet all other eligibility requirements outlined in 7 C.F.R. 247.9. Idaho excludes the Affordable Connectivity Program’s (ACP) benefits from the CSFP income eligibility requirements.

The IFB will notify each participant immediately if any changes to the program occur.

In accordance with 7CFR Part 247.5 (b)(10), The Idaho Foodbank will establish the appeals and fair hearing procedures for local agency and program participants. All fair hearing procedures will include the requirements under 7CFR 247.33(a).

## Nutritional Risk Criteria

Nutritional risk will not be used as criteria when determining program eligibility.

## Caseload Management

1. Caseload

According to The Idaho Foodbank 2022 Annual Report, The Idaho Foodbank serves an estimated 184,650 persons monthly; and according to the 2022 Map the Meal Gap Report there are an estimated 8.4% adult Idahoans who are food insecure. Idaho’s CSFP program goal is to reach 100% utilization of caseload assigned by the Food and Nutrition Service (FNS) for the Federal Fiscal Year to better serve the low-income seniors currently placed on waiting lists.

1. Determining Eligibility

The Idaho Foodbank uses the Federal Poverty Income Guideline at or below 130% for elderly. Participants must provide proof of age such as an ID card. No Social Security Number is required. Participants need to reside in the served area. If they move, they can transfer their eligibility to another county. Income verification can be made by client’s self – declaration.

1. Waiting List

If the need is greater than awarded funding to eligible individuals, The Idaho Foodbank utilizes a waiting list at each distribution location. Individuals on the waiting list shall be prioritized by date of application. Waiting lists shall include the name of the applicant, the date placed on the waiting list, and the address or phone number of the applicant. Individuals shall be notified of their placement on a waiting list within 10 days after they submit their application.

1. No Show Policy

As per the No-Show policy, if a participant fails to pick up their CSFP box for two consecutive months, The Idaho Foodbank will notify the participant by sending a Notice of Action stating the participant will be discontinued from the program at the end of the current month under 7 CFR 247.17.

1. Staffing

The ICOA will retain the amount determined by the following formula for administrative purposes:

(1) Fifteen percent of the first $50,000 received.

(2) Ten percent of the next $100,000 received.

(3) Five percent of the next $250,000 received; and

(4) A maximum of $30,000, if the administrative grant exceeds $400,000.

1. ICOA

Approximately 0.25 FTE staff are needed to implement the program (Program Specialist, Senior Financial, Administrative Services Manager and Administrator). These positions will be responsible for grant management, evaluation, review, and USDA reporting.

1. The Idaho Foodbank

2 FTE staff are needed to implement and maintain the program (Ordering/Procurement, Agency Relations, Program Reporting, and Nutritional Services). These positions will be responsible for administration and operation of the Commodity Supplemental Food Program, including maintaining all records and files, processing and approving applicants, correspondence with participants and potential participants, guidance and oversight of sub-distributing agencies, development and maintenance of program materials, and development of nutrition education materials, nutrition education survey creation and dissemination. Additionally, these positions will be responsible for reporting to the ICOA monthly and ensuring program compliance with all USDA regulations.

2 FTE contract staff are needed to operate the program (Drivers and Warehouse Personnel). These positions will be responsible for the transportation, inventory, and storage, invoicing of CSFP products, and maintaining CSFP best practice warehousing standards.

All program activities will remain in compliance with USDA regulations 7 CFR Parts 247 and 250.

## Outreach

The Outreach consists of informing eligible households, including homebound elderly about the availability of CSFP benefits and program. The Idaho Foodbank will provide the following information to partnering agencies and participants:

* Pamphlets, newsletters, public announcements, community bulletin board displays, event calendars, access information through the Aging and Disability Resource Center (ADRC), and posters.
* Face-to-face interviews with potentially eligible seniors, assisting them with filling out the application.

Additionally, The Idaho Foodbank will reach out to pantries and health care providers to help identify eligible participants for referral. ICOA will collaborate with aging network partners such as senior housing, meals on wheels, American Association of Retired Persons (AARP) and Senior Health Insurance Benefits Assistance (SHIBA) to disseminate information about the CSFP.

1. Referrals to Other Programs

 The Idaho Foodbank will also provide participants with written information on nutrition, health, Social Security, Medicaid, or other public assistance programs monthly and/or make referrals as appropriate.

## Storage and Distribution

1. Storage

The Idaho Foodbank has facilities in Boise, Lewiston, and Pocatello. These three locations possess dry, refrigerated and freezer storage capabilities. The Idaho Foodbank utilizes First in First out (FIFO) distribution practices to ensure that the oldest products move out of the facility first. Utilizing the Ceres 9 ERP inventory control software, all products are stored and tracked by bin locations and lot numbers. Lot numbers are critical to tracking in the event of a food recall. Internal transfers from branch to branch are tracked as well in Ceres and the lot identification follows the product regardless of the location. Fourteen Standard Operating Procedures have been developed around the ERP software and utilized within Ceres involving all points of inventory control. Cycle counts are conducted monthly, and a wall-to-wall physical inventory is conducted each quarter.

1. Distribution

Distribution of CSFP products would begin with the order entry process. Eligible agencies will place orders electronically. Order creation conducted by order entry staff will allocate CSFP products based on availability, people served, and FIFO inventory methodologies. Orders will be prepared in each of the warehouses and organized for will call or delivery depending on the agency’s disposition. Delivery orders will be scheduled and delivered via The Idaho Foodbank’s refrigerated fleet. Provisions would also be available for direct ship orders for qualifying orders and agencies.

## Nutrition Education

The local agency is responsible for making nutrition education available to all participants. The local agency must provide nutrition education that can be easily understood by participants and is related to their nutritional needs and household situations. The local agency must provide nutrition education that includes the following information, which should account for specific ethnic and cultural characteristics whenever possible:

(1) The nutritional value of CSFP foods, and their relationship to the overall dietary needs of the population groups served.

(2) Nutritious ways to use CSFP foods.

(3) Special nutritional needs of participants and how these needs may be met.

(4) The importance of health care, and the role nutrition plays in maintaining good health; and

(5) The importance of the use of the foods by the participant to whom they are distributed, and not by another person.

The local agency shall provide a nutrition education flyer in the CSFP distribution boxes every month for a total of 12 flyers per year. The flyer shall include nutrition informational topics that coordinate with contents of the box, nutrition topics that line up with other nutrition education activities, and recipes that utilize components of the box. The flyers may be created by the Dietician on staff at the local agency or use existing materials, see attachment 4.1 in the CSFP Policy and Procedures manual. The flyers will be reviewed and approved by the Programs Coordinator at the local agency.

During the biennial local agency review the State agency will review compliance of the nutrition education and evaluation requirements.

To ensure that the nutrition education provided is effective, the local agency will develop and disseminate a nutrition survey biennially to the CSFP participants. Once the nutritional survey is approved by the state agency the local agency will distribute the nutritional survey to the distribution partners who will distribute, collect, and return the survey back to the local agency in a 2-month time.

The evaluation will include participant input. After collecting the results, the local and state agencies will meet to analyze the survey results. The local and state agencies will utilize the evaluation results to adjust the program nutrition education plan to ensure effectiveness if needed.

## Pursuit of a Claim

ICOA will establish standards, based on a cost-benefit review, for determining when the pursuit of a claim is cost-effective, and must ensure that local agencies use these standards in determining if a claim is to be pursued if awarded funding. In pursuing a claim against a participant, the local agency must:

* Issue a letter demanding repayment for the value of the commodities improperly received or used.
* If repayment is not made in a timely manner, take additional collection actions that are cost-effective, in accordance with the standards that will be established by ICOA.
* Maintain all records regarding claims actions taken against participants, in accordance with §247.29.

In accordance with 7CFR Part 247.5 (b)(10), The Idaho Foodbank will establish the appeals and fair hearing procedures for local agency and program participants. All fair hearing procedures will include the requirements under 7CFR 247.33(a).

Reference to the Idaho CSFP Policy and Procedures manual Chapter 8 for guidance in determining if the claim is cost-effective and procedures to follow.

## Needs of the Homebound Elderly

In Accordance with CFRs 247.5 & 247.6, The Idaho Foodbank and its distribution partners shall accommodate the needs of the homebound elderly with homes-based certification as well as food delivery to the extent possible. Procedures for certifying the applicant are the same for the homebound as the general population. Homebound participants will be encouraged to assign a proxy to retrieve and deliver their CSFP box to them. Applications will include this as an option.

Other programs that reach homebound elderly will be explored as potential partners in serving this population such as the Home Delivered Meals from the Senior Centers.

## Copies of Agreements

Agreements will be developed upon notification of award and provided to USDA.

# Section V: Additional Requirements

##  Civil Rights

The ICOA and The Idaho Foodbank must comply with following requirements:

Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Clarifies the scope of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 & Americans w/Disabilities Act (ADA) of 1990 and ADA Amendments Act of 2008, Disability Title IX of the Education Amendments of 1972, Age Discrimination Act of 1975, 7 CFR 15(a)(b)(c) USDA implementing regulations for Federally assisted programs, 7 CFR 16, “Equal Opportunity for Religious Organizations” Gives equal footing to religiously affiliated organizations, 28 CFR 35, Covers nondiscrimination on the basis of disability in State/local government services (public entities), 28 CFR 42 Covers nondiscrimination in Federally assisted programs, Executive Order 13166 -"Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, August 11, 2000), Executive Order 13988 –“Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation” (86 FR 7023, January 20, 2021), “USDA Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons With Limited English Proficiency” (79 FR 229, November 28, 2014), USDA Departmental Regulation 4300-003 Equal Opportunity Public Notification Policy, USDA Departmental Regulation 4330-002 Prohibits discrimination in programs and activities funded in whole or in part by the USDA, FNS Instruction 113-1 and Appendix C Civil Rights compliance and enforcement, 7 CFR Parts 247 & 250 (CSFP), Sections 4(a) and 5 of the Agriculture and Consumer Protection Act of 1973 (Public Law 93-86), as amended. (CSFP) including the collection of racial/ethnic participation data and public notification of nondiscrimination policy.

Civil Rights training and guidance will be incorporated into any formal ICOA CSFP training sessions. The statement below concerning the availability of the program to all eligible participants will be included in forms and materials developed for the Program: **Nondiscrimination Statement**

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 based on race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA’s TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf> from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant’s name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:** U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights1400 Independence Avenue, SW Washington, D.C. 20250-9410; or
2. **fax:** (833) 256-1665 or (202) 690-7442; or
3. **email:** program.intake@usda.gov

This institution is an equal opportunity provider.

Public Notification

The poster, “And Justice for All” version AD-475A, will be prominently displayed at all venues and facilities used for the distribution of CSFP food. It should also be displayed at temporary distribution sites when CSFP commodities are issued and at the food distribution facility. Any written materials or websites that are used to promote/market the CSFP will contain the non-discrimination statement and procedures for filing a complaint. The materials will be targeted to eligible recipient agencies providing services to the low-income elderly population.

ICOA will consider all comments and recommendations received from The Idaho Foodbank and other interested parties’ relative to program operations. Any amendments to the CSFP State Plan of Operation either because of public comments received or via a modification or enhancement shall be submitted to USDA – FNS for approval prior to implementation.

## Applicant Rights

The Idaho Foodbank will aid with English limited or non-English applicants.

Applicants who are denied CSFP services must be notified of their right to appeal. The Idaho Foodbank will develop appeals process to resolve any applicant’s issues.

## Investigation of Complaints

Program complaints will be directed to and remedies will be developed by - The Idaho Foodbank.

## CSFP and COVID-19

During COVID-19 ICOA is waiving the signature requirement to receive a food box until further notice, but the distribution coordinator will still be required to have a checklist/roster with all client names and proxies to verify who picks up the food box. Even though there is no specific requirement per 7 CFR 247.10(b) for CSFP that requires signatures for CSFP household food distributions, there is language that refers to this requirement existing in the updated 2021 Policy and Procedure Manual:

*5.3.E: Participants pick up food packages at their destinated distribution site once each month during the distribution site’s normal hours of operation. Staff at the site shall verify recipient identity and eligibility prior to distributing the foods and shall require the participant or proxy to sign for the receipt of food packages.*

*3.4.C: Food packages shall be delivered directly by the local agency, by volunteers and/or proxies or, if possible, by programs in the AAA, such as the Home-Delivered-Meal program. The homebound elderly recipient or their proxy shall be required to sign a roster or receipt upon delivery of the food package.*

There is an addendum to the contract in place as well.