# MASSACHUSETTS

# DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION

**OFFICE OF FOOD AND NUTRITION PROGRAMS**

# STATE PLAN OF PROGRAM OPERATIONS AND ADMINISTRATION

# OF

# THE COMMODITY SUPPLEMENTAL FOOD PROGRAM (CSFP)

January 2025

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 and Secondary Education and The Greater Boston Food Bank

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

State Plan of Program of Operations and Administration of Commodity Supplemental Food Program

This document represents our plan for the administration of the Commodity Supplemental Food Program (CSFP) in the Commonwealth of Massachusetts. By agreement with the U.S. Department of Agriculture (USDA), the Massachusetts Department of Elementary and Secondary Education (DESE) is the distributing agency in Massachusetts for USDA Foods. A copy of this plan and local agencies that participate in the program are available on the DESE website ([Food Distribution - Office for Food and Nutrition Programs](https://www.doe.mass.edu/cnp/food_dist.html)).

1. **Local Agency Identification**

The following local Agency has expressed desire to participate in an agreement with the Massachusetts Department of Elementary and Secondary Education (DESE) to operate the Commodity Supplemental Food Program in Massachusetts:

The Greater Boston Food Bank (GBFB)

70 South Bay Avenue

Boston, MA 02118

II. CERTIFICATION

1. **Assessment**
2. Eligibility Requirements: To be certified as eligible to receive USDA supplemental foods each applicant must meet the following criteria:

a. Individuals shall be sixty (60) years old or older with household income at or below One Hundred Fifty percent (150%) of the annually published federal poverty income guidelines.

b. Income eligibility determinations shall be based on the gross monthly household income of the family unit. The definition of a family is an economic unit which generally means a group of related or non‑related individuals who share all significant income and expenses of its members. The economic units are characterized by the sharing of expenses, such as food, housing, medical costs, and household insurance expenses.

(1) Monthly income is defined as gross income before required or voluntary deductions.

(2) Eligibility determinations shall be made based on income received by the household during the month prior to application. If income received during the month prior to application is not representative of current income, the certification staff may consider income during the previous 12 months to determine which more accurately reflects the household’s status.

(3) Determination of monthly income:

(a) Weekly income times 52.

(b) Biweekly income [every two- (2) weeks] times 26.

(c) Semi-monthly (twice a month) times 24.

(d) Monthly times 12.

2. There shall not be any nutritional risk requirement or criteria imposed.

3. Certification site staff shall verify identification, age, and residency of participants prior to certification. Sources of verification include, but are not limited to:

a. Driver’s License or other state-issued identification card;

b. Birth certificate;

c. Medicare/ MA Health card;

d. Check stubs or statement from employer;

e. Award letter or other official document, verifying participation in a federal, state, or local program for low-income persons.

4. A Social Security card IS NOT an acceptable source of verification.

5. Site certification staff should document verification with notation on the application with an indication of what form of verification was seen

6. Certification site staff shall verbally verify that the client meets the income guidelines. No sources of verification are required.

1. **Eligibility Determination**
2. The Local Agency’s designated official will promptly determine eligibility/ineligibility and notify applicant within 10 days. If eligible, the participant shall receive food within 30 days. THE LOCAL AGENCY designated officials may provide temporary monthly certification to eligible CSFP applicants to fill any caseload slots resulting from nonparticipation by certified participants. Recipient agencies may certify individuals for one-month periods to maximize caseload use and provide temporary CSFP benefits to participants on waiting lists when a regular program participant misses a scheduled distribution.
3. At the time of certification or re-certification participants are given the opportunity to self-identify race and ethnicity. If the participant chooses not to self-identify race and ethnicity, the certifier must record the participant’s race and ethnicity based on visual observation. This information is entered into the computer during certification or re-certification and is submitted to DESE each year when the racial/ethnic data is due.
4. Each participant shall be notified at least 15 days before the expiration of the certification period that eligibility is about to expire. The maximum certification period is two years. At the one-year mark, the local agency should document they conducted the required checks in their records. Required checks are:
5. Verify the address and continued interest of the participant; and
6. Have sufficient reason to determine that the participant still meets the income eligibility standards, which may include a determination that the participant has a fixed income.
7. The local agency will need to conduct a formal review of eligibility at the two-year mark, at which time, the signatures of the participants will be required.
8. The State is choosing not to utilize the *Adjunctive Income Eligibility* option.
9. **Certification Notification**

1. The Local Agency shall either certify the applicant or notify eligible applicants that they have been put on a waiting list or notify the applicant of eligibility or ineligibility for the program within 10 days of the applicant’s first visit to the local agency to apply for participation in the program. A person who is determined to be eligible shall receive supplemental foods within 30 days of notification of eligibility.

1. **Termination/Ineligibility**
	* 1. Written notification to participants of termination/ineligibility will be sent 15 days prior to the termination date. This notice will include the effective date of discontinuance, reason for termination/ineligibility, and the participants’ right to a fair hearing, including the method to request the fair hearing and the right to be represented at the hearing. The documented reasons for ineligibility are held on file by the local agency. Applicants will be advised of their rights, including non‑discrimination, fair hearings, and nutrition education.

#### Certification for Relocation

1. The Local Agency shall ensure issuance to every participant who intends to relocate during the certification period. The Local Agency will accept forms from participants who have been participating in the Program in another local agency, within or outside the jurisdiction of the State Agency. The Local Agency may request a new application to verify accuracy of current information.

#### III. Caseload Management

1. There is an inherent need to have a management system to effectively and efficiently control caseload to ensure caseload is not surpassed.

1. The waiting list policy is established when the program has reached maximum caseload.

2. The waiting list will include:

a. Applicant’s name and status,

b. Address,

c. Telephone number,

d. Date applicant is placed on list,

e. Age.

B. A maximum certification period of one (1) year has been established for all program participants. The Local Agency will maintain a list of participants that require renewal under the 1-year certification. All applicants will be recertified in the month their applications are approved.

C. Every effort should be made to provide CSFP benefits to applicants. When the maximum caseload has been reached, the local agency must keep a list of all potential applicants who contact the agency in person. Applicants should be informed of the income standards at the initial contact to avoid later screening effort. Certification from waiting lists will be on a first come, first served basis.

D. A form denoting the period of certification will be given to each participant upon approval of the application.

## IV. Outreach

1. On an annual basis, DESE will reach out to all other food banks to encourage their participation in CSFP.
2. CSFP information will also be made available to Massachusetts Office of Elder Services programs provided by the Local Area Councils on Aging and the Meals on Wheels food delivery program.
3. Local Agencies will provide written information and referrals to the Senior Farmer’s Market Nutrition Program to expand awareness and access to the program, where applicable.
4. The current nondiscrimination statement will appear in all news releases:

**V. Nutrition Education**

1. CSFP Nutrition Education Services
2. Nutrition education is to be considered a benefit of the program and is to be provided to each participant at no cost. Nutrition education must be offered to all participants. Nutrition education may be provided by another community‑based nutrition program.

2. No participant shall be denied supplemental food for failure to participate in the nutrition education services offered through the CSFP or other community nutrition programs.

3. The local agency must provide nutrition education that includes the following information, which should account for specific ethnic and cultural characteristics whenever possible:

a. The nutritional value of CSFP foods, and their relationship to the overall dietary needs of the population groups served;

b. Nutritious ways to use CSFP foods;

c. Special nutritional needs of participants and how these needs may be met;

d. The importance of health care and the role nutrition plays in maintaining good health;

e. The importance of the use of the foods by participants to who they are distributed.

1. Evaluation
2. A regular review of CSFP nutrition education services will be conducted by the State Agency and will include:

a. A review of local agency nutrition education policies and procedures.

1. The Local Agency will establish an evaluation procedure to obtain the views of CSFP participants or their caretakers concerning nutrition education provided. The evaluation will be directed by a nutritionist or other qualified professional. The purpose of the survey is to assist in program planning at the state and local level and ensure overall effectiveness of nutrition education offered. The Local Agency will provide evaluation results to DESE upon request.

**VI. NUTRITIONAL RISK CRITERIA**

No nutritional risk criteria are imposed at this time.

**VII. FOOD Storage/Distribution/Record Keeping**

1. Local Agency:
2. The Massachusetts Department of Elementary and Secondary Education, Office for Food and Nutrition Programs, 135 Santilli Hwy, Everett, MA 02149 will be the primary distributing agency. The Greater Boston Food Bank. 70 South Bay Ave., Boston, MA 02118 will be the local agency and will provide food storage facilities as the program is implemented. GBFB currently receives USDA foods for distribution under The Emergency Food Assistance Program (TEFAP) program in Massachusetts.
3. Foods ordered from USDA will be delivered to GBFB’s warehouse located at 70 South Bay Avenue, Boston, MA 02118. GBFB will provide storage for these commodities which will protect them from theft, spoilage, damage or destruction or other loss. When the recipient agency places an order for a delivery from GBFB; commodities are taken from the warehouse and shipped to the recipient agency.
4. The recipient agency will issue a supplemental food package to participants monthly or bimonthly, as determined by needs and capacity at individual sites. Participants come in and present their barcode ID (or other acceptable form of ID), which includes the recipient’s name and ID number. The individual site will document client received the food package in accordance with the food package guide rate established by Food and Nutrition Service (FNS). Participants pick up their commodities at the recipient agency monthly or bimonthly.
5. Should non-CSFP foods be offered at the same time as CSFP distribution, the “other” products will be packaged separately and marked in such a way that identifies them as non-CSFP foods.
6. Procedures for picking up food packages at designated sites are as follows:
7. The Local Agency will encourage participants to list 2 different proxies on their application. One main proxy and a second proxy in case the first proxy isn’t available or not able to pick up the CSFP box.
8. Participants or their designated proxy may receive the packaged food.
9. Proxy may be verbally designated by the participant and recorded by site staff. Site staff will maintain a list of proxies by participants.
10. Site staff can be the proxy for all participants at the distribution site. Site staff must maintain a list of proxies by participant and a list of approved site staff who are proxies. Site staff may sign or check off participant on a pre-printed list of site participants.
11. Participant or proxy arrives at designated distribution sites, self-declares identity, and receives the food package. Site staff note by checking off name on pre–printed list or by recording name. The distribution site may modify their distribution method to meet state and local public health recommendations or requirements during this emergency. Modifications can include but are not limited to:
	* 1. Drive up/thru
		2. Tailgate distribution by food banks
		3. Home delivery to quarantined or self-isolating individuals
		4. Guidance provided by local board of health
12. Summary of the streamlined process:
	* + - 1. Participant or proxy arrives at the agency site
				2. Participant or proxy will self-declare identity
				3. Site staff checks off pre-printed list or records name and COVID-19 and/or emergency (in leu of participant or proxy signature)

d. Site staff act as designated site staff as proxies for the site. Food bank maintains list of proxies and site person(s) are documented and list maintained.

1. Should a site be unable to connect with a participant and/or proxies, The Local Agency and/or the site will contact previously approved clients and offer them the available food boxes to prevent “leftover” boxes being stored at the site. The supplemental clients will have up to 72-hours to pick up the boxes.

1. New applicants:

Site staff will have the flexibility to use alternative means to conduct intakes of new applicants if face-to-face is not possible and/or to avoid person to person exposures to a vulnerable population that needs food. However: The food bank must ensure that local sites do subsequently obtain a new applicant’s signature. This can be done by mail or next in-person contact opportunity.Intakes can include but are not limited to:

1. Over the phone
2. Via email
3. On-line
4. Video
5. Guidance provided by local board of health
6. DESE or The Local Agency will not require any participant to make payment or provide services in connection with receipt of CSFP commodities. DESE or The Local Agency will not use the distribution of CSFP commodities as a means for furthering the political interest of any person or party.
7. Ensure distribution to eligible participants and recipient receipts are returned to The Local Agency. Receipts will be utilized for inventory management and confirmation of recipient participation at only one distribution site, i.e., detection and prevention of dual participation. Please refer to GBFB SOP-Identifying duplicate participant’s instructions below:

**Procedure Title:**  SOP-Identifying duplicate participants

**Purpose:**  The purpose of this procedure is to outline steps while processing CSFP (Commodity Supplemental Food Program) Paperless Applications by Community Investment team that may have been entered twice at a CSFP site OR when a client is served by two different sites. This is in accordance with CSFP Code of Federal Regulations 7 CFR 247:19 Dual Participation.

**Responsibility:** It is the responsibility of the Community Investment team member to process and approve, waitlist, or deny CSFP Paperless Applications.

**Procedure:** CSFP Paperless Applications can be entered by CSFP site on a continuous cycle. Community Investment Team runs a CSFP Duplicate Cases Search Report at the time of initial application and during annual certification.

*Approving First Time Clients*

1. Designated GBFB (Greater Boston Food Bank) program staff reviews and approves every client that has a new CSFP form.
	1. GBFB staff will cross reference clients’ address and date of birth against all CSFP clients in Massachusetts.
		1. Log into Oasis under ‘ADMINISTRATOR’ to view all clients in the database.
		2. Enter client’s name.
		3. Cross check Date of Birth and Address.
	2. GBFB staff will approve or deny based on findings.

*Review for Duplications / Dual Participation at the time initial application and during annual certification.*

1. Once site has entered all new CSFP forms / Certifications;
	1. Log into ADMIN Site in Oasis
	2. Click on ADMIN tab
	3. Click on Reports tab
	4. Click on CSFP Duplicate Cases Search Report
		1. Add twelve-month date range (corresponding to the certification month)
		2. Click NEXT
		3. Click Custom Template: CSFP Duplicate Cases Search Report-CSV
		4. Click Request Report
2. Once CSV report is processed in excel format, save the document, and complete the following steps:
	1. Or alternatively use highlight duplicate cells from cell formatting.
	2. Check each client's records to ascertain if the name and address are similar or dissimilar.
		1. Record which dates the client first registered with the site.
		2. Reach out to the site with the most recent registration.
		3. Inform site that this is a duplicate client.
		4. Mark the CSFP form of the client as denied with a note as to why.
		5. Sent client a formal letter of denial from the respective site.
3. Records will be maintained in a suitable place for a minimum of three (3) years following the close of the federal fiscal year to which they pertain. USDA and DESE are authorized to inspect all program operations, including records and reports, at any reasonable time.
4. Physical inventories are taken monthly at The Local Agency and submitted to DESE. DESE uses that inventory report each month to complete the FNS153 report which is sent to the Northeast Regional Office (NERO).

**VIII. CLAIMS**

1. The Local Agency will be responsible to the Massachusetts Department of Elementary and Secondary Education (DESE) for any improper or negligent issuance of supplemental foods and misuse of program funds and will make restitution for any improper or negligent authorization.

**Food Loss (Damage/Expired):**

* 1. When a loss of food occurs after delivery to the recipient agency, for either damaged or expired food, a claim determination must be made. If the value of the food loss is more than $500.00 but does not exceed $2500.00, DESE makes a claim determination. If the value of the lost food exceeds $2500.00, documentation must be forwarded to the USDA Northeast Regional Office (NERO) for concurrence with a claim determination by DESE. If the GBFB is found to be negligent DESE must pursue a claim for the value of the food. All claim payments must be paid by check, payable to DESE.

**Food Loss (Improperly Distributed/Received by Local Agency Participant):**

* 1. If it is determined that a participant has received food packages at multiple distribution agency sites, a claim determination must be made. If the value of the food loss is more than $200.00 but does not exceed $500.00, DESE makes a claim determination. If the value of the lost food exceeds $500.00, documentation must be forward to the USDA Northeast Regional Office (NERO) for concurrence with a claim determination by DESE. If the GBFB is found to be negligent DESE must pursue a claim for the value of the food. All claim payments must be paid by check, payable to DESE.

**Food Loss (Claim):**

* 1. DESE will not assess any claim against GBFB, local agency or a CSFP participant which is less than $200.00. DESE feels any claim less than $200.00 is not cost effective to pursue.

**Follow Up (Training):**

* 1. Should there be any instance where improper or negligent issuance of supplemental foods and misuse of program funds was found, DESE will ensure the parties responsible will be retrained on proper procedures to prevent such incidents from happening in the future. Confirmation of such training(s) will be documented for future reference.

IX. HOMEBOUND

Homebound participants are eligible for CSFP by the local distributing agency, but it is the participant’s responsibility to have a proxy pick-up the USDA Foods for them.

* 1. A proxy form signed by the participant, the proxy and a CSFP staff member must be on file for proxy pickup.
	2. CSFP participant is responsible to inform proxy of food distribution schedules.
	3. Home deliveries to homebound participants is permissible during pandemics and/or state of emergencies, as long as state and local public health requirements and recommendations are followed. Site staff can act as proxies for a homebound participant.