



Illinois Department of Human Services

Commodity Supplemental Food Assistance Program (CSFP)

POLICY AND PROCEDURE MANUAL

Revision 9/30/2022

Table of Contents

Definitions.....	3
Chapter 1 Program Administration	5
Chapter 2 Certification	6
Chapter 3 Waiting Lists	10
Chapter 4 Adverse Action Notifications	12
Chapter 5 Certification Period.....	14
Chapter 6 Transfer of Certification.....	15
Chapter 7 Dual Participation	16
Chapter 8 Caseload Management.....	17
Chapter 9 Participant No-Show Policy.....	19
Chapter 10 Outreach Efforts	20
Chapter 11 Homebound Elderly.....	21
Chapter 12 Nutrition Education	22
Chapter 13 Direct and Multi-food Ordering and Receiving	24
Chapter 14 Food Package Assembly.....	25
Chapter 15 Food Package Distribution.....	26
Chapter 16 Inventory Control and Reports	28
Chapter 17 CSFP Food Losses and Claims.....	29
Chapter 18 Management Evaluation and Annual Inventory Review.....	31
Chapter 19 Training, Monitoring and Technical Assistance.....	32
Chapter 20 Financial Management Systems	33
Chapter 21 Administrative Costs.....	34
Chapter 22 Records and Reports.....	35
Chapter 23 Pursuit of Claims against Participants.....	36
Chapter 24 Complaints.....	37
Chapter 25 Civil Rights	38
Chapter 26 Fair Hearings.....	40
Chapter 27 Site Management	42
Attachments.....	43

Definitions

Applicant: any person who applies to receive program benefits. Applicants include program participants applying for CSFP recertification.

Bill of Lading (BOL): a document provided by shipping/trucking company or multi-warehouse as a written record of commodity foods shipped and received by the LA. The BOL details the types and number of commodities shipped and received by LA.

Caseload: number of persons the State agency may serve monthly during a caseload cycle. State caseload is determined by USDA FNS.

Caseload cycle: the period from January 1 through the following December 31. Caseload may be adjusted based on the Federal Fiscal Year (FFY) or during the Federal Fiscal Year.

Certification: criteria and procedure used to determine an applicant's program eligibility for CSFP.

Certification period: the period of time a participant continues to receive program benefits.

Certification Site: An Agency or Organization's physical location that accepts applications, certifies eligibility, and maintains proper records of CSFP applications. Certification sites can be a Distribution Site. See "Distribution sites" definition.

Commodities: nutritious food purchased by USDA foods to supplement the diets of CSFP participants.

CSFP: Commodity Supplemental Food Program.

CSFP Participant: An elderly person, 60 years of age or older, authorized by the distribution site to receive a CSFP box in each month.

Disqualification: the act of ending Program participation of the participant as a punitive sanction.

Distribution Site: An Agency or Organization's physical location that distributes USDA commodities and nutrition education to CSFP Participants. Distribution Sites can be a Certification Site. See "Certification Site" definition.

Dual participation: simultaneous participation by a participant in CSFP at more than one CSFP distribution site.

Elderly persons: persons at least 60 years of age.

Federal Fiscal year: the period from October 1 through the following September 30.

Food and Nutrition Services (FNS): the section of the United States Department of Agriculture (USDA) that manages the federal food assistance programs.

Food banks: an agency, organization or institution that collects, warehouses, and distributes food.

Food Package: A variety of USDA commodities distributed to CSFP Participants.

Homebound elderly persons: persons who are, in the judgment of the Local Agency or distribution site, unable to obtain monthly food packages without assistance provided by or through the Local Agency or distribution site.

IDHS: Illinois Department of Human Services

Local agency (LA): a public or private nonprofit agency, which enters into an agreement with the State agency to administer CSFP at the local level.

Low-Income Eligibility: the applicant, by self-declaration, who falls within the Federal Poverty Income Guidelines set for by USDA. For CSFP, 130% of the Federal Poverty Income Guidelines are used.

Nonprofit agency: a private agency or organization with tax-exempt status under the Internal Revenue Code.

Participant: An elderly person, 60 years of age or older, and income eligible that is accepted into CSFP and receives monthly supplemental commodities under this program.

Proxy: person designated by a participant or caretaker, to obtain food package on behalf of the participant.

State Agency (SA): The Illinois Department of Human Services.

State Plan: the document the State Agency uses to administer the CSFP program in the State.

USDA: United States Department of Agriculture.

Chapter 1 Program Administration

PURPOSE: To outline the regulatory and procedural guidelines for administering CSFP.

POLICY: The Illinois Commodity Supplemental Food Program (CSFP) shall be administered in accordance with federal regulations, the State Plan, the contract Duties of the Grantee, and the Policy and Procedure Manual.

PROCEDURES:

- A. The Illinois Commodity Supplemental Food Program (CSFP) works to improve the health of older persons at least 60 years of age by supplementing their diets with nutritious USDA commodity foods. The Illinois Department of Human Services (IDHS) administers the CSFP. The CSFP food packages do not provide a complete diet, but rather are good sources of the nutrients typically lacking in the diets of the target population. These include vitamins A and C, calcium and iron.
- B. USDA purchases food and makes it available to IDHS along with funds for administrative costs. IDHS and state agencies coordinate the distribution of food to public and non-profit private local agencies in Illinois. Distribution sites through the guidance of Local Agencies determine the eligibility of applicants, distribute the foods, and provide nutrition education. Distribution sites also provide referrals to other welfare, nutrition, and health care programs such as SNAP (Supplemental Nutrition Assistance Program), Medicaid, and Medicare.
- C. Participants must reside in the State of Illinois, within a CSFP service area, be elderly (age 60 or above), and have income at or below 130 percent of the Federal Poverty Income Guidelines.
- D. Food packages include a variety of foods, such as non-fat dry milk, shelf stable milk, juice, hot or ready-to-eat cereal, rice or pasta, peanut butter or dry beans, canned meat or poultry or tuna or salmon and canned fruits and vegetables.
- E. For more information go to: <https://www.dhs.state.il.us/> or contact:

Illinois Department of Human Services
Bureau of Family Nutrition
823 East Monroe St.
Springfield, IL 62701
217.782.2166

Chapter 2 Certification

REFERENCES: 7 CFR 247.8 through 247.17

PURPOSE: To provide guidance for the certification process and completion of the CSFP Participant Application.

POLICY: Prior to the issuance of program benefits, trained certifying volunteers shall verify that each applicant is eligible, determine availability of caseload, make written notifications, and maintain required documentation in accordance with program regulations.

PROCEDURES:

- A. Local agencies shall assure certifying officials are trained and demonstrate understanding of the requirements of the certification process.
- B. All certification data for each applicant shall be recorded on the CSFP Participant Application. **Attachment A**
 - 1. Any individual requesting to apply shall be allowed to complete the CSFP Participant Application form. If caseload is not available, eligible applicants shall be placed on the waiting list.
 - 2. All completed CSFP Participant Applications forms shall be retained for a period of three years plus the current year, including those of applicants determined to be ineligible and all previous applicants and participants.
 - 3. Authorized site personnel accept applications, review and document on the application, verification of age, address, and identity.
- C. To be eligible for CSFP, certifying official must determine the applicant meets the following criteria:
 - 1. Individual is age 60 or above.
 - 2. Resides within the CSFP service area.
 - 3. Self-discloses income eligibility.
 - a. Elderly persons are income eligible if they have household income at or below 130% of federal poverty income guidelines.
- D. Applicants must be informed:
 - 1. Before applicant signs form, certifying officials must assure the sentences located on the back side of the application are read by, or read to, the applicant or the applicant's caretaker, in the appropriate translation, at the time of certification.
 - 2. Appeals Process information and forms shall be available at all distribution sites where copies shall be available upon request.
 - 3. The And Justice for All poster must be posted in a prominent location at all certification sites. This poster is also available on the web at <https://www.fns.usda.gov/cr/and-justice-all-posters-guidance-and-translations>

- E. Certifying officials shall complete the section under “Agency Staff Complete”
1. Identify/Eligibility/Age –Describe proof shown
 2. Residency verified and Outreach Handout – Confirm proof of residency and if outreach handouts were given.
 3. Applicant Eligible - Indicate whether the applicant is eligible by checking ‘Yes’ or ‘No’
 4. Caseload Available – Indicate if caseload is available by checking ‘Yes’ or ‘No’.
 5. Certifying Official enters ‘Date Written Notice Given’ to applicant, signs, includes staff title and completes ‘Date Certified’.
 6. 2nd Year Verification Date – Certifying Official (staff) review application information with participant, if no information has changed, write the date in box.
 7. 3rd Year Verification Date - Certifying Official (staff) review application information with participant, if no information has changed, write the date in box.
 8. Applications are valid for 3 years. Following the completion of the third year, all participants must complete a new application and apply again for CSFP.

F. CSFP application forms are kept on file and maintained at the certification site.

G. Within 10 days from the date of application, certifying officials must issue a notice of Eligibility or ineligibility for CSFP benefits or their placement on a waiting list.

(Attachment B)

1. Notification of eligibility must be in writing and must include the length of the certification period, and information on the time, location, and means of food distribution. Staff sign and date for Notice of Certification status form which is given to the applicant.
2. Notification of placement on a wait list must be in writing when applicants exceed available caseload. Certifying officials must maintain a waiting list of individuals who apply for the Program.
3. Notification of ineligibility must be given in writing to the applicant and must include the reason the applicant is not eligible. Certifying official must make a copy of the completed Notice of Eligibility and Certification Status form **(Attachment B)** and attach a copy to the individual’s application.

H. If there is no waiting list, a person determined eligible for program benefits shall receive supplemental foods at the next regularly scheduled distribution after notification of eligibility.

I. Elderly participant certification periods may be extended if all of the following conditions are met:

1. The person’s address and continued interest in receiving program benefits are verified.
2. The local agency has sufficient reason to believe that the person still meets the income eligibility standards, e.g. the elderly person has a fixed income.
3. The certifying official notifies the elderly participant in writing of the period of the extension. A written notice of certification period extension must be sent

to the participant, and the date entered on the application.

- J. The certifying official signs and completes the 2nd Year or 3rd Year verification section on the participant's application form **Attachment A** at least 15 days before the expiration of a certification period, participants must be notified in writing that eligibility for the CSFP Program is about to expire.
- K. A copy of the participant's current application form is available upon request by any participant relocating during the certification period and such forms from other CSFP locations or states shall be honored.

Categorical Eligibility

PURPOSE: To define population groups of individuals who are eligible to receive CSFP food packages and documents required to verify eligibility.

POLICY: The certifying official shall determine whether individuals are eligible to receive CSFP benefits in accordance with federal regulation.

PROCEDURES: The following information defines population groups eligible to receive CSFP benefits and verification criteria:

- A. The population group is elderly and defined as 60 years of age or older.
- B. Verification of eligibility is determined by showing a state issued identification card, driver's license or a birth certificate or hospital record of birth. If not available, any of the following may be used, which must show the applicant's name and age or date of birth:
 - 1. Insurance policy.
 - 2. Clinic, doctor, or hospital record.
 - 3. U.S. passport or U.S. citizen ID card.
 - 4. Marriage or divorce record.
 - 5. Voter's registration.
 - 6. Military record.

Residency Requirements

PURPOSE: To define the residency requirement for participation in the Illinois Commodity Supplemental Food Program.

POLICY: Person's eligible for Illinois' CSFP must reside in Illinois, within the normal service area of the distribution site. There are no duration or fixed residency requirements. Migrant and seasonal farm workers are considered as meeting the residency requirement.

PROCEDURES:

- A. Distribution sites are authorized to serve residents from counties within their normal service area as defined by IDHS. In special cases, distribution sites may serve residents from counties outside their service area if the area does not overlap another local

agency's CSFP service areas. The most current IL CSFP service areas can be obtained by inquiring with the Department at any time.

- B. Local agencies will establish non-overlapping service areas for distribution and certification sites under their jurisdiction.
- C. Elderly persons living in nursing homes are not eligible for CSFP benefits.
- D. Verification of residency may include a utility bill, driver's license, welfare identification card, a letter addressed to the applicant, or an indication from an employer that residency is in Illinois.

Participant Income

PURPOSE: To define what is considered income for purposes of CSFP income eligibility assessment.

POLICY: The certification site shall accept self-disclosed income by the elderly. Eligibility of income includes use the definition of income established in the federal regulations.

PROCEDURES:

- A. Income is gross cash income before any deductions. The certification site shall count as income the following:
- B. Monetary compensation for services, including:
 - 1. Wages or Salary.
 - 2. Commissions, Fees, Tips.
 - 3. Farming self-employment.
 - 4. Non-farming self-employment.
 - 5. Rental property.
 - 6. Royalties.
 - 7. Social Security benefits.
 - 8. Public assistance or welfare payments.
 - 9. Unemployment compensation.
 - 10. Strike benefits.
 - 11. Workmen's compensation.
 - 12. Pensions, retirement pay or annuities.

Chapter 3 Waiting Lists

REFERENCES: 7 CFR 247.11 and 247.15(a)

PURPOSE: To provide guidance for establishing and serving from a waiting list of individuals who apply for the Illinois Commodity Supplemental Food Program when applications exceed the assigned caseload level.

POLICY: If all caseload has been filled, the local agency shall assure that distribution sites maintain a waiting list of individuals who apply for the program in accordance with federal regulation.

PROCEDURES:

- A. The Illinois Department of Human Services assigns caseload to each local agency, who in turn allots caseload slots to each distribution site. When applications exceed the assigned caseload slots at the distribution site, the local agency shall assure the distribution site implements a waiting list.
- B. Notification will be sent to the applicant in writing within 10 days of the request for benefits when they are placed on a waiting list. Notice of Eligibility Determination and Certification Status form (**Attachment B**) may be used to notify applicants.
- C. Applicants placed on the waiting list are determined to be qualified but are considered a non-certified participant.
- D. non-certified participants on the waiting list will be served on a first come first serve basis when caseload slots become available. Examples of when caseload slots may become available are:
 - 1. The certification period is not extended for a certified participant.
 - 2. A certified participant moves from their current service area, moves to a nursing home, or voluntarily stops participating in the program.
 - 3. Another certified participant is discontinued or disqualified.
 - 4. The Distribution Site receives additional caseload slots.
 - 5. Upon the death of a current certified participant.
- E. When wait lists are required, available caseload authorizations must be offered to the first non-certified participant listed. Reasonable efforts must be made to contact non-Certified participants in the order they were placed on the list until all available caseload slots are filled.
- F. When there are non-certified participants on the waiting list, certified participants not eligible for certification extension must be notified in writing that eligibility for the Program is about to expire at least 15 days before the expiration of their certification period. Notification of appeal rights is not required at the expiration of a certification period, per 7 CFR 247.33(a).
- G. Before a non-certified participant on the waiting list can become a certified participant, the non-certified participant must review and update their CSFP Application form. The certifying official must complete the "Date Certified" and

- provide written notice.
- H. To facilitate caseload management, the distribution site will authorize one-month certification periods offered to non-certified participants when food packages remain undistributed at the end of the monthly distribution period.
 - I. Sites must establish a monthly distribution period ending prior to the end of the distribution month.
 - J. All certified participants must be notified of the distribution period and of the “No Show” policy when packages are not picked up during the monthly distribution period.
 - 1. When there are “No Shows” or when packages remain undistributed after the monthly distribution period, sites may offer one-month certification to non-certified participants starting with the first person on the wait list.
 - 2. Non-certified participants who are offered one-month certification must sign the distribution site’s box roster or received sheet and notified that the box is for one month only and their name will be kept on the wait list for certification.
 - 3. This process may be repeated each month that there are undistributed food packages after the monthly distribution period ends. Each time this process is repeated, the certifying official must start with the first non-certified participant on the waiting list.

Chapter 4 Adverse Action Notifications

REFERENCES: 7 CFR 247.15, 7 CFR 247.17, 7 CFR 247.20 and 7 CFR 247.33

PURPOSE: To provide guidance for notifying individuals of discontinuance or disqualification from CSFP.

POLICY: Individuals must be given written notification of any decision made by the local agency regarding discontinuance of or disqualification for CSFP benefits including the reason for the action and be provided within the time frames designated in accordance with the federal regulation.

If a Notice of Adverse Action form is given to a participant by disqualification due to program violations, a Notice of the Participant's Rights to a Fair Hearing must be given at that time.

PROCEDURES:

- A. A person found ineligible for the program by disqualification is considered an adverse action. The participant shall be advised in writing of the reasons of adverse action by the Notice of Adverse Action form (**Attachment C**) and given the Right to a Fair Hearing form (**Attachment I**) within 10 days of the adverse action.
- B. When a participant's certification period expires, rights to a fair hearing notification is not required per 7 CFR 247.33(a). Certification and extension of certification periods depends on caseload availability, whether applicants are waiting, and eligibility.
- C. If a distribution site has evidence that a participant is no longer eligible for CSFP benefits during the certification period, it must provide the participant with a written notification of discontinuance including the reason for discontinuance at least 15 days before the effective date of discontinuance using Notice of Adverse Action form (**Attachment C**). A copy of the notification shall be maintained retained in the individual's file.
- D. If a participant is no longer eligible for CSFP benefits due to violation of the established "no-show" policy, the local agency must provide the participant with a written notification of discontinuance including a reason at least 15 days before the effective date of discontinuance from the Program. A copy of the notification shall be kept in the individual's file.
- E. If a local agency does not have sufficient resources, such as enough caseload slots, to continue providing benefits to the participant(s) for the entire certification period, it must provide the participant(s) with a written notification of discontinuance including the reason on the notification at least 15 days before the effective date of discontinuance. A copy of the notification shall be maintained retained in the individual's file.
- F. CSFP applicants or participants, or caretakers of applicants or participants, who commit program violations may be disqualified for a period of up to one year in accordance with 7 CFR 247.20. The local agency must provide the individual with written notification of disqualification for CSFP including the effective date and period of disqualification and the reason for the disqualification at least 15 days before the effective date of

disqualification using the Notice of Adverse Action form and maintain a copy in the applicant's or participant's file.

Program violations include the following actions:

1. Intentionally making false or misleading statements, orally or in writing.
2. Intentionally withholding information pertaining to eligibility in CSFP.
3. Selling commodities obtained in the program or exchanging them for non-food items.
4. Physical abuse, or threat of physical abuse, directed at program staff.
5. Participating in two CSFP sites at the same time.

- G. Disqualification may be waived if the local agency determines that disqualification would result in a serious health risk. Waiver of disqualification must be documented and retained in the participant's file. A participant who commits three program violations that involve fraud must be permanently disqualified from participation in CSFP. In accordance with 7 CFR 247.20 (b), for the purposes of this program, fraud includes:
1. Intentionally making false or misleading statements to obtain CSFP commodities.
 2. Intentionally withholding information to obtain CSFP commodities.
 3. Selling CSFP commodities or exchanging them for non-food items.
- H. Individuals wishing to appeal a decision of discontinuance or disqualification for CSFP benefits have 60 days from the date of notice of adverse action. A request for a hearing is defined as any clear expression by the individual, guardian, or other representative that an opportunity to present its case to a Hearing Officer is desired.

Chapter 5 Certification Period

REFERENCES: 7 CFR 247.16

PURPOSE: To define the length of certification periods for program benefits according to participant category.

POLICY: Program benefits shall be based upon certifications established in accordance with the time frames designated by federal regulation.

PROCEDURES:

- A. Each participant shall be certified at the time of entrance into the program for a period not to exceed three (3) years based on information submitted with the Participant Application form. The certification period may be extended without a formal review of eligibility in year two (2) and year three (3) as long as the following conditions are met:
 1. The person's address and continued interest in receiving program benefits are verified and,
 2. The local agency has sufficient reason to believe that the person still meets the income eligibility standards. (e.g. the elderly person has a fixed income)
 3. The certifying official signs and completes the next extension when certifying conditions 1, 2, and 3 above are met.
 4. The certifying official notifies the elderly participant verbally or in writing of the period of the extension.
- B. Each certification period should allow for the issuance of food for a twelve (12) month period or to the end of the month in which eligibility expires. Certification periods may be shortened from twelve (12) months to bring the certification visit of all family members together or to be consistent with an agency's standard schedule.
- C. Each participant shall be notified in writing at least 15 days before the expiration of each certification period that eligibility for the Program is about to expire using Notice of Expiration of Certification Period. Documentation of the notification shall be retained in the individual's file. Notification is not required when certification period of an elderly participant is extended. In such cases the elderly participant's certification period is not expiring, it is being extended.
- D. Local agencies may choose to establish a standard yearly schedule to process certification extensions of elderly CSFP participants.

Chapter 6 Transfer of Certification

REFERENCES: 7 CFR 247.16(c)

PURPOSE: To provide a mechanism for certified participants to retain eligibility if they relocate during the certification period.

POLICY: Participants who relocate during the certification period may request local agencies and their subcontractors to facilitate the transfer to another service area.

PROCEDURES:

- A. Distribution sites upon request will help facilitate a participant who relocates during the certification period.
- B. Distribution site staff must complete the Participant Relocation Form (**Attachment D**) and send the original to the transferring site and keep a copy on file.
- C. The distribution site shall facilitate the transfer of participant's file to other distribution site.
- D. Verification of certification is valid until the certification period expires and shall be accepted as proof of eligibility for Program benefits.
- E. If a receiving distribution site has a wait list for participation, the transferring participant shall be placed on the list ahead of all waiting applicants.

Chapter 7 Dual Participation

REFERENCES: 7 CFR 247.19

PURPOSE: To provide a mechanism for detecting and preventing dual participation.

POLICY: Distribution sites in conjunction with local agencies and the Department are responsible for the detection and prevention of dual participation.

PROCEDURES:

- A. The following sentences appear on page 2 (back side) of the application and must be read by, or read to, the applicant or the applicant's caretaker, in the appropriate translation, at the time of certification. "... I am aware that deliberate misrepresentation may subject me to prosecution under applicable State and Federal statutes. I am also aware that I may not receive CSFP benefits at more than one CSFP site at the same time..."
- B. Local agencies shall establish safeguards against dual participation in two different CSFP programs at the same time by establishing procedures that identify participants who are participating in two different program locations, or by establishing specific service areas for each distribution site.
- C. Participants disqualified as a result of dual participation must be notified in writing at least 15 days before the effective date of disqualification using the Notice of Adverse Action form. Documentation of the notification shall be retained in the individual's file.

Chapter 8 Caseload Management

REFERENCES: 7 CFR 247.21 and 247.24

PURPOSE: To provide guidelines for the process of caseload management.

POLICY: Assigning and management of caseload will be accomplished in accordance with federal regulations and department policies with a target of utilizing 100% of assigned caseload annually.

PROCEDURES:

- A. The caseload assignment process is as follows:
1. The Illinois Department of Human Services is granted caseload for the Federal Fiscal Year (FFY) by the USDA Food and Nutrition Service.
 2. USDA announces caseload allocation annually. USDA evaluates requests for expansion caseload based on the actual caseload served during the previous FFY. A State's base caseload will be the highest average level served during either the entire FFY or the final quarter of the FFY. If a State serves less than an average of 95% of the assigned caseload, then the base caseload for the next calendar year may be set at the highest average level served.
 3. Illinois allocates caseload to local agencies based on the agency's requests, their demonstrated capabilities, projected CSFP eligible population within their service area and actual number of participants served during the previous fiscal year.
 4. The state's caseload allocation will be retroactive, starting October 1st of the FFY.
 5. Local agencies shall allocate caseload to each distribution site based on available caseload, estimated eligible population and the capacity of the site.
 6. The authorized caseload assignment will be made in terms of a monthly level, i.e., a caseload assignment of 500 authorizes 500 participants to receive food packages each month for the caseload cycle.
 7. The State Agency may adjust caseload allocations when a local agency consistently fails to serve its assigned caseload.
- B. Monitor caseload utilization and make adjustments as needed.
1. Local agencies must report the number of participants who actually receive commodity box/packages each month on the FNS-153.
 2. Local agencies shall monitor participation to assure maximum use of caseload and to maintain caseload at assigned levels. If a distribution site consistently fails to serve its assigned caseload, local agencies should redistribute caseload to other distribution sites where waiting lists are being maintained.

3. Fluctuations in participation are expected. Monthly monitoring will allow local agencies to adjust outreach efforts appropriately. If participation is below the assigned caseload, outreach efforts should be directed to contact and enroll eligible persons. If participation exceeds caseload level, outreach should be reduced. If necessary, waiting lists will be implemented.

Chapter 9 Participant No-Show Policy

REFERENCES: 7 CFR 247.17

PURPOSE: To establish the maximum allowable period that persons may fail to pick-up food packages and remain enrolled in the program.

POLICY: To remain enrolled in the Commodity Supplemental Food Program, persons may fail to pick-up food during no more than two consecutive months.

PROCEDURES:

- A. Local agencies shall establish a “no-show” policy stating the maximum allowable period that persons may fail to pick-up commodity packages and remain enrolled in the program. The period may not exceed two consecutive months.
- B. Each participant shall be informed of this policy during certification and recertification periods.
- C. Participants who are required to be in the hospital for extended stays retain their participant status. They should not be removed from the program for missing two consecutive months. They can be issued a package for any month within their certification period for which they had at least one day at home. If they have extended hospital stays covering every day of the month, they should not receive a food package for that month.
- D. Violation of the “no-show” policy shall result in discontinuance of CSFP benefits. If a participant violates the established “no-show” policy, the local agency must provide the participant with a written notification (**Attachment C**) of discontinuance including the reason at least 15 days before the effective date of discontinuance. A copy of documentation of the notification shall be retained in the individual’s file.
- E. Participants who are removed from the program for violation of the “no-show” policy are allowed to reapply for benefits unless they have violated the “no-show” policy twice previously. If a wait- list exists, participants reapplying after violating the “no-show” policy must be treated the same as all applicants and must be placed on the list in the order which they applied. Participants who violate the “no-show” policy a third time within a twelve-month period must be disqualified from CSFP for a period of up to one year, unless the local agency and distribution site staff determines that disqualification would result in a serious health risk.

Chapter 10 Outreach Efforts

REFERENCES: 7 CFR 247

PURPOSE: Outreach activities designed to maximize caseload utilization.

POLICY: Outreach activities shall be conducted by the Department and Local Agency.

PROCEDURES:

- A. Outreach to elderly populations may be conducted through the Area Agencies on Aging, as well as through various community venues. Flyers promoting the program criteria and benefits for participation can be developed. The link to the IDHS CSFP website should be included in the flyer information, which is:
<https://www.dhs.state.il.us/page.aspx?item=31874>
- B. The Department will work- closely with local agencies to assure that all outreach activities are conducted in accordance with federal regulations and the State Plan. Local agencies can create flyers to post and/or distribute to local businesses and other community agencies announcing the availability of the program and where to go to get benefits.

Chapter 11 Homebound Elderly

REFERENCES: 7 CFR 247.5(c)(7) & 7CFR 247.6(c)(10)

PURPOSE: To outline efforts that are required to meet the needs of homebound elderly.

POLICY: Local agencies shall coordinate arrangements to meet the needs of homebound elderly.

PROCEDURES:

- A. Distribution sites along with the local agency shall coordinate efforts to meet the needs of homebound elderly to conduct certification and delivery of food packages. Distribution sites shall also allow designated proxies to pick up food packages for homebound elderly individuals.
- B. When appropriate, local agencies and distribution site staff shall conduct training to volunteers in the communities to take applications to elderly persons and to collect appropriate information and documentation. Actual certification of the homebound elderly shall occur at distribution sites.
- C. Food packages shall be delivered directly by the local agency, distribution site or by volunteers and/or proxies. The homebound or the proxy shall be required to sign a roster or receipt upon delivery of the food package.

Chapter 12 Nutrition Education

REFERENCES: 7 CRF 247.6(c)(7) and 7 CFR 247.18

PURPOSE: To establish an overall nutrition education plan.

POLICY: Local agencies shall provide nutrition education that can be easily understood by participants and is related to their nutrition needs and household situations.

PROCEDURES:

- A. The Local Agency shall make nutrition education available to all participants on a monthly basis, through newsletters, recipes, and/or another Department approved method to address the following subject matter:
 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, such as low sodium/heart-healthy cooking, diabetic-friendly meals, vitamins and minerals such as calcium, vitamin D, iron, and B12, and how these needs may be met.
 4. The importance of health care, and the role nutrition plays in maintaining good health.
 5. The importance of the use of the foods by the participant to whom they are distributed, and not by another person.
 6. Other program information (e.g. Supplemental Nutrition Assistance Program, Senior Farmer Market Nutrition Program, etc.).
- B. The Department or local agency or another agency with which it has an agreement may use CSFP foods to conduct cooking demonstrations as part of the nutrition education provided to program participant, but not for other purposes.
- C. The Local Agency shall survey the participants on an annual basis with the Department approved *Participant Nutrition Education Survey (Attachment H)* which has been approved by a Licensed Dietitian Nutritionist in order to:
 1. Determine the effectiveness of the nutrition education provided.
 2. Determine the preferred format/types of nutrition education offered.
 3. Gain a better understanding of which commodities participants are using/not using, to in turn increase consumption and acceptance of commodities that are frequently left over each month.
- D. Nutrition Resources on the USDA websites:
<https://www.fns.usda.gov/csfp/nutrition-factsheet>
<https://www.fns.usda.gov/csfp/sharing-gallery-handouts>

The Dietary Guidelines for Americans (DGA) is the foundation for Federal nutrition policy and nutrition education related activities. The DGA's provides food-based recommendations to promote health, help prevent diet-related disease, and meet nutrient needs. It is published every 5 years, jointly through the USDA and Department of Health and Human Services (HHS).

<https://www.dietaryguidelines.gov/>

The Supplemental Nutrition Assistance Program (SNAP) Nutrition Education program promotes health through direct nutrition education that supports knowledge, skill acquisition and behavior change that reflects dietary guidance and through policy, systems, and environmental changes by making affordable healthy food and space for physical activity accessible where people eat, live, learn, play, and shop.

<https://snaped.fns.usda.gov/snap-ed-works/nutrition-education>

The MyPlate is based on the most recent Dietary Guidelines for Americans and is designed to help put food-based recommendations into practice by categorizing foods into groups based on an individual's dietary needs. This website provides resources such as tip sheets, recipes, nutrition quizzes, etc.

<https://www.myplate.gov/>

Nutrition.gov is a USDA-sponsored website that offers credible information to help you make healthful eating choices. <http://www.nutrition.gov>

A senior-friendly website from the National Institute on Aging and the National Library of Medicine. This simple-to-use website features popular health topics for older adults. It has large type and a "talking" function that reads text out loud.

<https://www.nia.nih.gov/health>

MedlinePlus brings together authoritative information from NLM, the National Institutes of Health (NIH), and other government agencies and health-related organizations. Search the site for Health Topics including Nutrition, Nutrition for Seniors and Child Nutrition.

<http://medlineplus.gov>

The gateway to government food safety information. <http://www.foodsafety.gov>

Chapter 13 Direct and Multi-food Ordering and Receiving

REFERENCES: 7 CFR 247

PURPOSE: To outline the Direct and Multi-food ordering and receiving process for the Commodity Supplemental Food Program in Illinois.

POLICY: The Department and Local Agencies manage the direct and multi-food ordering process for the Commodity Supplemental Food Program. The local agencies receive and warehouse the commodities.

PROCEDURES:

- A. Direct and multi-food orders are placed in the Web Based Commodity Supply Chain Management (WBSCM) system. IDHS is the State Distributing Agency (SDA). Local agencies are referred to in the system as Recipient Agencies (RAs). Level 1 Access to USDA's eAuthorization system and proper linkage are prerequisites to access WBSCM. At least one person at each local agency must apply for Level 1 Access to USDA eAuthorization. Local agencies are to have a staff person to serve as backup.
- B. Each local agency has an established monthly delivery schedule in WBSCM, typically one or two days per month.
- C. The local agency completes the multi-food order in WBSCM.
 1. To determine the number of cases to order the local agency must consider existing inventory levels and anticipated receipts.
 2. The on-hand supply of any food type should be enough to make distributions for at least two extra months and should not exceed a two-and-a-half-month supply. The two-month supply is needed to assure that complete packages can be assembled.
- D. Local agency enters direct delivery orders and notifies the Department. Department staff reviews, consolidates in WBSCM for final ordering. The carrier contacts the local agency to confirm delivery and schedule the time. The local agency must follow the instructions in the USDA publication "FNS Handbook 501" (<https://www.fns.usda.gov/fdpir/fns-handbook-501>) regarding inspection, over, short, or damaged shipments, and out of condition commodities. The local agency confirms the Bill of Lading (BOL) information is correct, signs it and receipts in WBSCM within 24 hours or submits to the Department within 24 hours for receipting
- E. The Department tracks all receipts, overages, shortages or damage through WBSCM.

Chapter 14 Food Package Assembly

REFERENCES: 7 CFR 247.10(a), 7 CFR 247.28 and 7 CFR 250.14

PURPOSE: To provide guidelines for the assembling of food packages for the Commodity Supplemental Food Program in Illinois.

POLICY: Local agency shall assemble food packages in accordance with USDA CFSP Food Package Monthly Distribution Rates and program regulations.

PROCEDURES:

- A. Foods required to be included in food packages are listed by USDA for the Commodity Supplemental Food Program, Maximum Monthly Distribution Rates.
- B. Maximum Monthly Distribution Rates may be updated by USDA to meet nutritional requirement standards, demand, or supply changes at any time.
- C. The Department will provide notice to Local Agencies of any modifications to the CSFP food package outlined in USDA memos.
- D. Local agencies must establish internal controls to ensure proper monthly food distribution rates as outlined by the most current USDA food package memo.
- E. Modified or partial food packages MAY NOT be distributed.
- F. A food package tracking system must be implemented by the Local Agency to identify the content by unit of each package so that an accurate end of the month inventory can be accomplished.

The food package tracking system should identify the following:

- 1. Either the pack month and year or the intended distribution month and year.
- 2. The specific food items in the package.
- 3. The contents of the food package must be assigned an alpha-numeric code or tracking method policy established by the Local Agency.
- 4. If there is a change in commodity item during package assembly, a new code should be assigned, and the new contents documented for that code. For example, if the warehouse runs out of spinach, another vegetable is used to pack in commodity boxes to ensure complete food packages are issued. It is also acceptable to list all items within a package on a label affixed to the package.

Chapter 15 Food Package Distribution

REFERENCES: 7 CFR parts 247.4, 247.10, 247.28 and 250.14

PURPOSE: To provide guidelines for the distribution of food packages for the Commodity Supplemental Food Program in Illinois.

POLICY: Local agency shall assure that supplemental food packages are distributed in accordance with Program regulations.

PROCEDURES:

- A. Local agencies are responsible for recruiting and/or establishing food distribution sites. Each site must conform to local, state, and federal health standards and must enter into an agreement with the local agency to assure proper food handling, storing, and distribution procedures and recording requirements are maintained.
- B. The local agency shall provide the name, address, contact information and caseload of each distribution site to the Department.
- C. The written agreement with the distribution site shall be on file at the local agency and distribution sites. A copy of written agreements shall be sent to the Department.
- D. If local agencies allow distribution sites to store commodities, local agencies shall assure that distribution sites under their jurisdiction provide adequate care and security for the food while in their possession. Foods shall be stored in adequate and secured areas at each distribution site to safeguard them from spoilage, infestation, fire, theft and other losses.
- E. Participants pick up food packages at their designated distribution site once each month during the distribution site's normal hours of operation. Staff at the site shall verify recipient identity to distributing the foods and shall require the participant or proxy to sign for the receipt of food.
- F. Local agencies may permit the use of proxies if procedures are in place to deter fraud. At a minimum, such procedures must:
 1. Require that the participant authorizes proxies in writing.
 2. Require that record of proxy designations be maintain on file.
 3. Require that the proxy provide some form of identification prior to completing the certification, recertification, or food package distribution process; and
 4. Determine whether participants receive the food package released to proxies for delivery.
- G. Distribution site staff or volunteers may deliver food packages to homebound participants by the end of the month or within seven working days of a single distribution day whichever is latest. Participants or authorized proxy must sign for the receipt of food packages.

- H. The frequency of food distribution to participants shall be a one-month food package issued each month for the current month. Food shall not be issued in the current month for a past month except when food packages are delivered to homebound participants and a single distribution day falls less than five working days from the end of the month.
 - 1. When undistributed food packages remain after distribution, the packages may be offered to the first applicants on the waiting list. Recipients of such packages must be advised that there is no guarantee of a food package the following month.
 - 2. When undistributed food packages remain at the end of the month the distribution site must report the number of boxes remaining to the local agency.
 - 3. The local agency shall reduce the number of boxes issued to the distribution site the next month by the number of undistributed food packages remaining at the end of the month except as indicated in number 4 below.
 - 4. Sites that operate continuous distribution throughout the month may need to have food packages remaining at the end of the month in order to have them available for distribution prior to the next delivery of food packages from the warehouse. However, reports must reflect the exact number of food packages distributed during each month and adequate controls to prevent food loss must be in place.
- I. Participants will not be required to make any payments or provide any materials or services in connection with the receipt of CSFP commodities and, they will not be solicited in connection with the receipt of CSFP commodities for voluntary cash contributions for any purpose.
- J. Distribution of supplemental foods shall not be used as a means for furthering the political interest of any person, organization, or party.

Chapter 16 Inventory Control and Reports

REFERENCES: 7 CFR parts 247.28, 247.29, 250.14 and the instructions for form FNS 153.

PURPOSE: To outline inventory control and reporting requirements for the Commodity Supplemental Food Program.

POLICY: Local agency staff members are responsible for maintaining a system that will account for all foods received and distributed, in accordance with Program regulations and for submitting required reports.

PROCEDURES:

- A. The Department maintains a master database for each local agency. The FNS 153 carries over the ending inventory from the previous month to provide the beginning inventory for the reporting month. Local agencies must enter food receipts, distributions or issuances and all other commodity activity for the 153-inventory report month.
- B. Local agencies must conduct a per unit month-end physical inventory of all commodity foods on hand.
- C. Local agencies shall compare the agency-wide per unit physical inventory with the ending inventory calculated on the 153 inventory report. The ending inventory calculated on the report must equal the physical inventory amounts.
 1. If the physical inventory differs from the ending inventory reflected on the report, the local agency must show positive or negative adjustments to cause the calculated ending inventory to agree with the actual physical inventory amounts.
 2. A written explanation is required for each inventory adjustment.
- D. The 153 inventory report must be submitted to the Department by the 20th day of the following month, unless otherwise specified by the Department.
- E. The local agency must report food losses due to damage, spoilage, or infestation. A written explanation is required for each food loss item.
- F. If neglect, carelessness, and/or willful mishandling cause damage to or loss of USDA donated food or if USDA donated foods are used for non-eligible persons or distributed improperly, local agencies, warehouse personnel and other persons are subject to a claim determination and the corresponding repayment responsibility.

Chapter 17 CSFP Food Losses and Claims

REFERENCES: 7 CFR 247.6(c)(9); 7 CFR 250.16(a); FNS Instruction 410-1, Rev. 2

PURPOSE: To outline policy and procedures regarding the loss of USDA Donated Commodities and the food loss claim process.

POLICY: I. Food loss occurs when USDA donated commodities, received in good condition by a Local Agency or Distribution site, are damaged and/or made unfit for human consumption, lost or stolen, damaged upon receiving from USDA shipments, and cannot be distributed to CSFP Participants.
Food loss also occurs when commodities are not distributed by the Local Agency or Distribution site by the best if used by date listed on the CSFP Food product(s).

II. If a total food loss valued at \$250.00 or above is reported, The Department is required to investigate and remediate the food loss. The value of each lost food item will be determined by the price of USDA donated commodities at the time of the reported loss.

PROCEDURES:

- A. When a food loss occurs that is valued at \$250.00 and above, the Local Agency shall submit a food loss damage report form to the Department for each occurrence. In addition, quantities for each food item lost will be listed in the Monthly FNS-153 report for the month the loss occurred.
- B. The Department will review all food loss damage reports and other documentation requested by the Department to determine the cause and final value of the total food loss.
- C. If food loss has occurred due to neglect, carelessness, and/or willful mishandling causing damage, used or distributed improperly, the Local Agency may be subject to a claim action by The Department.
- D. The Department will notify the Local Agency of its findings and/or claim determination within 30 days of the Local Agency's submission of the food loss damage report.
- E. If a food loss claim is made against the Local Agency, the Department shall provide what remedial steps must be taken by the Local agency to satisfy the claim.
- F. The Local Agency shall be given 30 days after the receipt of the Department's claim notification to notify the Department of its agreement with the claim determination and intent to remedy, or object to the Department's claim and submit supporting documentation if deemed applicable by the Department.
- G. As a priority, the Local Agency shall be responsible for the purchase of replacement CSFP commodities. Replacement foods must, if possible, be sourced by the Local Agency of like food type and quantities.
- H. If similar foods types and quantities cannot be sourced, the Local Agency may propose alternate CSFP food types and quantities that must be approved by the Department before purchasing.
- I. The Local Agency shall submit documentation and/or proposals to purchase replacement food to the Department and must receive approval prior to purchasing.

- J. Documentation of purchase and receiving of replacement food must be submitted to the Department by the Local Agency.
- K. Replacement CSFP foods purchased by claims will be placed back into CSFP inventory and will be Reported on the FNS-153 as a "Re-Donation IN" for the month they were received by the Local Agency.
- L. The Department may, at its discretion, request food loss claim funds to be paid by the Local Agency to the Department. Collected food loss funds from the Local Agency will be deposited into the Department's CSFP Food Salvage Account to purchase replacement CSFP food inventory.
- M. Demands for direct payment to the Department from the Local Agency must be paid in 30 Days of the notification of the claim action.
- N. The Department will provide a final notification to the Local Agency of the actions that were taken to satisfy the claim and the date of closing.
- O. The Department will maintain records of all correspondence related to each food loss incident and internally track the use of all recovered food funds.

Chapter 18 Management Evaluation and Annual Inventory Review

REFERENCES: 7 CFR 247.34

PURPOSE: To outline the management evaluation process and annual inventory reviews the Department will use with Commodity Supplemental Food Program contracted local agency.

POLICY: I. Each local agency that contracts with the Illinois Department of Human Services will be monitored for compliance with Program regulations on a biannual basis.
II. A physical inventory review of CSFP commodities will be conducted by the Department on an annual basis.

PROCEDURES:

- A. The Department evaluates program administration on an ongoing basis by reviewing financial reports, audit reports, food orders, inventory reports, and other relevant information.
- B. At least once every two years, the Department performs an on-site review of local agencies, storage facilities, and distribution sites. As part of the on-site review, the Department evaluates all aspects of program administration, including certification procedures, nutrition education, civil rights compliance, food storage practices, and financial management systems. **(Attachment F)** The Department also randomly selects distribution sites to review. **(Attachment G)**
- C. The Department will complete a physical inventory control review on an annual basis to ensure the local agencies have a proper system in place to account for all CSFP commodities stored at their warehouses.
- D. Following the monitoring review, the local agency will receive a copy of the report with instructions to submit a corrective action plan if areas of non-compliance are noted. Areas of non-compliance will be reviewed with the local agency representative. The Local agency is required to respond to all corrective actions within 30 calendar days of the review with a written report.
- E. The monitor will review the corrective action plan to assure that the plan is feasible and complete and will contact the local agency if additional action is required.
- F. The local agency will implement corrective actions.
- G. If significant problems exist and or appropriate corrective actions are not taken, the local agency may be in non-compliance with the contract agreement between the State and local agency. Failure to comply with federal regulation and the contract scope of work could result in termination of the contract and from the CSFP.

Chapter 19 Training, Monitoring and Technical Assistance

REFERENCES: 7 CFR 247

PURPOSE: To outline the training, monitoring, and technical assistance required of local agencies participating in the Commodity Supplemental Food Program.

POLICY: All local agency staff, distribution site staff and volunteers shall receive appropriate training at least annually to assure that issuance of supplemental food is in accordance with FNS food package instructions and Program regulations. All distribution sites under CSFP agreements with the local agency shall be monitored annually for compliance with Program regulations.

PROCEDURES:

- A. Local agencies must implement a process for training and evaluation of all staff and volunteers involved in the CSFP. Training should be appropriate to the degree and frequency of an individual's involvement in the CSFP.
 1. Training shall be documented including date, topics covered, persons attending, and sites represented.
- B. Local agencies shall provide technical assistance and at least annually, monitor the certification of participants and receipt and issuance of commodity food packages on site to assure compliance with Program regulations, policies, and procedures. Monitoring shall be documented using the CSFP Distribution Site Review Form, including date of review, findings, corrective actions, and follow-up.
- C. The State provides technical assistance for local agency staff upon request. Teleconference calls shall be provided for periodic updates.

Chapter 20 Financial Management Systems

REFERENCES: 7 CFR part 247.27

PURPOSE: To describe the financial management systems maintained to assure compliance with financial management regulations.

POLICY: There will be accurate, current, and complete disclosure of the financial status of the Program in accordance with federal regulations, including an accounting of all program funds received and expended each fiscal year.

PROCEDURES:

- A. The IDHS financial management assures accurate and timely drawdown of federal funds.
- B. Local agencies are required by contract to follow state and federal procurement procedures. Both the Department and local agencies are required to maintain inventory records for all CSFP transactions.
- C. Funds are made available to the local CSFP agencies through contracts by the Illinois Department of Human Services. The contracts specify the services to be performed according to federal regulations and the state plan of operation. Contracts also specify the allocation of administrative funds and caseload. All payments for administrative funds are disbursed in the form of reimbursements for administrative costs incurred by the local agency.
- D. The local agencies are responsible for the cost of receiving, storing, and distributing the commodities from their location to distribution sites and if coordinated, to participants. Any claims containing expenses that do not reflect appropriate program expenditures will be adjusted pending further justification from the local agency.

Chapter 21 Administrative Costs

REFERENCES: 7 CFR parts 247.25

PURPOSE: To provide guidance for the use of the Illinois Commodity Supplemental Food Program administrative funds.

POLICY: Funds provided to local agencies may be used to cover administrative costs identified to be necessary to carry out the Program functions.

PROCEDURES:

- A. Local agencies shall submit a budget annually projecting the amount of administrative funds to be expended based on the following line items:
 - 1. Personnel
 - 2. Fringe Benefits
 - 3. Travel
 - 4. Equipment
 - 5. Supplies
 - 6. Contractual Services
 - 7. Construction
 - 8. Occupancy – Rent and Utilities
 - 9. Telecommunications
 - 10. Direct Administrative Costs
 - 11. Other or Miscellaneous Costs' Grant Exclusive Line Item(s)
 - 12. Total Direct Costs
 - 13. Indirect Cost

- C. Local agencies wishing to use CSFP program funds to purchase equipment valued at or above \$500.00 must obtain prior written approval from the Department. Local agency must describe how the purchase will be made in a manner to provide open and free competition. The Department must obtain prior written approval from the USDA MPRO for equipment purchased in whole or in part with federal funds of \$5,000.00 or more.

- D. Specific examples of unallowable uses of administrative funds in CSFP include:
 - 1. The cost of alteration of facilities not required specifically for the program; and
 - 2. Actual losses that could have been covered by permissible insurance (through an approved self-insurance program or by other means).

Chapter 22 Records and Reports

REFERENCES: 7 CFR 247.28 and 7 CFR 250.6(r)

PURPOSE: To provide guidance for the Illinois Commodity Supplemental Food Program recordkeeping and reporting requirements.

POLICY: State and local agencies shall maintain accurate and complete records in accordance with federal and state regulations and policies and the contract scope of work.

PROCEDURES:

- A. All records and supporting documentation shall be retained for a period of 3 years following the end of the federal fiscal year to which the records pertain, or, if they are related to unresolved claims actions, audits, or investigations, until those activities have been resolved.
- B. All records shall be available during normal business hours for federal or state representatives to inspect, audit, and copy.
- C. To be acceptable for audit purposes, all financial and program performance reports shall be traceable to source documentation.
- D. Following is a list of reports, documents, and due dates.
 1. Form FNS153 monthly inventory report – Due by the 18th of the month for the preceding month. If the 18th day of the month is on a weekend or holiday, the report may be submitted on the next business day after.
 2. Monthly Caseload Participation Due with submission of FNS-153, on the FNS-153 form.
 3. FNS Form 191 Racial/Ethnic Group Participation – Completed annually during the month of April. The Department will send the form to the local agencies and will specify a due date.
 4. FNS Form 57 – Report of Shipment Received Over, Short and/or Damaged – Required when shipments are received over, short and/or damaged. Local agency must submit with copies of bills of lading to the Department within 2 business days after a shipment is received. Information is entered in WBSCM Shipment Receipts.
 5. Bill of Lading – Local agency or the Department enters no later than two (2) business days after receipt of shipment.

Chapter 23 Pursuit of Claims against Participants

REFERENCES: 7 CFR parts 247.25(f), 247.30(c) and (d), and 250.15(c)

PURPOSE: To establish standards and procedures for pursuit of claims against participants.

POLICY: When cost effective, local agencies shall initiate a claim against a participant to recover the value of CSFP commodities improperly received or used.

PROCEDURES:

- A. The pursuit of a claim against a participant to recover the value of CSFP commodities improperly received or used is cost effective when the value exceeds \$100 or three (3) months of CSFP benefits.
- B. For the purposes of this program, fraud includes intentionally making false or misleading statements or intentionally withholding information to obtain CSFP commodities, or the selling or exchange of CSFP commodities for non-food items.
- C. If the distribution site and/or local agency determines that the participant, proxy or caretaker of the participant, fraudulently received or used the commodities, the local agencies must document the number of months CSFP benefit was improperly received or used. If at least three (3) months of benefits were improperly received or used, a claim against the participant must be pursued.
- D. In pursuing a claim against a participant, the Department must:
 1. Issue a letter requesting repayment for the value of the commodities improperly received or used.
 2. If repayment is not made in a timely manner, consideration will be made to take additional collection actions that are cost-effective, in accordance with the standards established by IDHS.
 3. Maintain all records regarding claims actions taken against participants, proxies and caregiver.
- E. Letters demanding repayment for the value of the commodities improperly received or used must:
 1. Advise the participant of the opportunity to appeal the claim through the fair hearing process, and
 2. Provide a copy of process.
- F. The distribution site must also disqualify the participant from CSFP for a period of up to one year, unless it is determined that disqualification would result in a serious health risk. Result of action is documented.

Chapter 24 Complaints

REFERENCES: 7 CFR 247.5(a)(4) and 250.6(u)

PURPOSE: To outline the procedures for reporting, processing, and resolving complaints about supplemental foods.

POLICY: Local agencies shall report, process, and resolve complaints about supplemental foods in accordance with federal regulation.

PROCEDURES:

- A. During certification all participants and applicants will be informed of their rights and obligations. Participants will be advised of the policy of non-discrimination and the procedure for filing a complaint if they believe they have been discriminated against.
- B. Depending on the nature of the complaint, the problem will be promptly investigated by the local agency and the person making the complaint will be notified of the results in writing. All persons making complaints must be notified of their right to a fair hearing so they may take further steps should their complaint not be satisfactorily resolved.
- C. Complaints suggesting a potential health hazard will be reported immediately to the Department by the local agency. The Department will immediately refer the matter to the Section for Environmental Public Health, the U.S. Department of Agriculture, and the local public health agency for prompt follow-up and resolution.
- D. All complaints will be documented along with appropriate and necessary corrective action. Follow-up on complaints will be conducted within 45 days of resolution of the complaint to assure that all problems have been corrected.
- E. The distributing agency, in cooperation with the local agency, will investigate promptly complaints received in connection with the distribution or use of commodity foods, correct any irregularity, and inform the local agency and the Department. The distributing agency will maintain documentation on file of complaints and actions taken. The Department reserves the right to make investigations and has the final determination as to when a complaint has been properly adjusted. Serious irregularities will be reported to USDA by the Department in writing.

Chapter 25 Civil Rights

REFERENCES: 7 CFR parts 247.13 and 247.37 and FNS Instruction 113-1

PURPOSE: To outline actions required to assure Civil Rights requirements are met.

POLICY: State and local agencies will comply with Title VI of the Civil Rights Act of 1964 and all requirements imposed by federal and state regulations.

PROCEDURES:

- A. Each local agency, distribution site, and certification site must display in a prominent location the “And Justice for All” Poster (AD-475A) also available on the website at <https://www.fns.usda.gov/cr/and-justice-all-posters-guidance-and-translations> including translations into several different languages.
- B. Each local agency and/or each distributing agency shall collect the number of participants receiving food packages by racial/ethnic category during the month of April each year. This count may be collected as a manual head count of food box recipients or may be collected from a review of certification forms. Counts must be submitted each year on the FNS-191 Racial/Ethnic Group Participation form to the Department by the designated date.
- C. Written materials used to promote or advertise the program must contain the non-discrimination statement and procedures for filing a complaint. If the material is too small to permit the full statement to be included, the material will at a minimum include the statement “*This institution is an equal opportunity provider.*” The full authorized statement reads as follows:

“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.”

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/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.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: mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400

Independence Avenue, SW Washington, D.C. 20250-9410; or fax: (833) 256-1665 or (202) 690-7442; This institution is an equal opportunity provider.”

- D. All staff should receive annual training on all aspects of civil rights compliance. Staff should be able to identify a civil rights complaint if received. They should know what to do if they receive a complaint and they should understand that it is the basic right of the individual to file a complaint.
- E. Where a significant proportion of the population of the area served by the distribution site is composed of non-English or limited English speaking persons who speak the same language, program information, except certification forms, shall try to be provided in the appropriate language orally and in writing. Bilingual staff members or interpreters shall be available to serve these persons.
- F. Local agency compliance to Civil Rights requirements is reviewed during the management evaluation and documented on the monitoring review form. Local agencies must monitor compliance to Civil Rights requirements by distribution sites at least annually.

All complaints alleging discrimination based on race, color, national origin, sex (including gender identity and sexual orientation), disability or reprisal or retaliation for prior civil rights activities will be accepted, either verbally or written. In the event of a verbal complaint, the person to whom the allegations are made must write up the elements of the complaint for the complainant. Every effort should be made to have the complainant provide the following information:

1. Name, address, and telephone number or other means of contacting the complainant,
 2. The specific location and name of the State agency, Department, local agency, or distribution site delivering the service or benefit,
 3. The nature of the incident or action that led the complainant to feel discrimination was a factor, and an example of the method of administration that is having a disparate effect on the public, potential eligible persons, applicants, or participants,
 4. The basis on which the complainant believes discrimination exists. The bases for nondiscrimination are race, color, national origin, age, disability, sex (including gender identity and sexual orientation), or reprisal or retaliation for prior civil rights activities,
 5. The names, telephone numbers, titles, and business or personal addresses of persons who may have knowledge of the alleged discriminatory action, and
 6. The date(s) during which the alleged discriminatory actions occurred or, if continuing, the duration of such actions.
- G. All complaints received by the local agency, the Department or IDHS, either verbal or written, which allege discrimination shall be referred to the USDA-FNS/MWRO and processed in accordance with the complaint processing procedures and timelines in FNS Instruction 113-1.

Chapter 26 Fair Hearings

For Individuals

REFERENCES: 7 CFR parts 247.12 and 247.33

PURPOSE: To provide a hearing process that allows a CSFP applicant or participant to appeal an adverse action.

POLICY: Individuals have a right to a fair hearing and may appeal any decision made by the local agency regarding denial or discontinuance of program benefits, disqualification from the program, or a claim to repay the value of commodities received as a result of fraud.

PROCEDURES:

- A. Reasons for denial that are appealable include:
1. Denial or discontinuance of program benefits.
 2. Disqualification from the program.
 3. A claim to repay the value of commodities received because of fraud.
- B. Appeal Procedures 247.33 (b) thru (h)
1. An individual, or an individual's caretaker, may request a fair hearing by making a clear expression, verbal or written, to the Department or local agency official, that an appeal of the adverse action is desired.
 2. The request for appeal must be made within 60 days from the date the agency mails or gives the individual the notification of adverse action.
 3. The state or local agency may deny a request for a fair hearing when: (1) The request is not received within 60 days; (2) the request is withdrawn in writing by the individual requesting the hearing or by an authorized representative of the individual or (3) the individual fails to appear, without good cause, for the scheduled hearing.
 4. Participants who appeal the discontinuance of program benefits with the 15-day advance notification period required under 247.17 and 247.20 must be permitted to continue to receive benefits until a decision on the appeal is made by the hearing official, or until the end of the participant's certification period, whichever occurs first. However, if the hearing decision finds that a participant received program benefits fraudulently, the local agency must include the value of benefits received during the time that the hearing was pending, as well as for any previous period, in its initiation and pursuit of a claim against the participant.
 5. The State, Department or local agency must provide an individual with at least 10 days' advance written notice of the time and place of the hearing and must include the rules of procedure for the hearing.
- C. The individual may:

1. Examine documents supporting the State, Department or local agency's decision before and during the hearing.
 2. Be assisted or represented by an attorney or other persons.
 3. Bring witnesses
 4. Present arguments
 5. Question or refute testimony or evidence, including an opportunity to confront and cross-examine others at the hearing.
 6. Submit evidence to help establish facts and circumstances.
- D. Appeal Decisions 247.33 (i) thru (l)
1. The hearing officer must be an impartial official who does not have any personal stake or involvement in the decision and was not directly involved in the initial adverse action that resulted in the hearing.
 2. A hearing decision must be made, and the individual notified of the decision, in writing, within 45 days of the request for the hearing.
 3. If the decision is in favor of an applicant who was denied CSFP benefits, the receipt of benefits must begin within 45 days from the date that the hearing was requested if the applicant is still eligible for the program.
 4. If the hearing decision is against the participant, the State, Department, local agency or distribution site must discontinue benefits as soon as possible, or at a date determined by the hearing official.
 5. A hearing report shall be available for public inspection and copying but shall assure confidentiality.

For Local Agencies

REFERENCES: 7 CFR 247.35

PURPOSE: To provide a fair hearing procedure to allow local agencies to appeal a decision that adversely affect their participation in CSFP.

POLICY: Local agencies have a right to appeal any action by the State or Department that adversely affects their participation in CSFP.

PROCEDURES:

- A. All requested fair hearings will be conducted within 30 days from the date the department receives the request for a hearing, unless waived by local agency in writing. Those requesting a hearing will be notified in writing a minimum of 10 days in advance of the time and place of the hearing and of the hearing procedure.
- B. The Department shall conduct hearings in accordance with Illinois Administrative Code Title 89 Part 508 – Administrative Hearings.
- C. The local agency will be notified in writing of the ruling within 30 days of the hearing. All decisions shall be based on the evidence presented at the hearing.

Chapter 27 Site Management

REFERENCES: Illinois CSFP State Plan

PURPOSE: To provide guidance for management and operation of distribution sites.

POLICY: Each site used for distribution of food packages will adhere to a standard operating procedure.

PROCEDURES:

- A. Each approved site distributing CSFP food packages identifies a Site Manager as the primary contact.
- B. Local Agencies are assigned a caseload and allocate a caseload to each distribution site. Caseload is based on the capacity of the site to distribute the food package and the proximity of eligible participants.
- C. The Site Manager ensures arrangement is made with the Local Agency to pick up, or have delivered, the required number of food packages prior to each distribution.
- D. When maximum caseload is achieved, eligible applicants are placed on a waiting list, listed by date and time of application. The Site Manager reports to the Local Agency when changes are made to the active participant list and the wait- list.
- E. The Site Manager communicates to certified participants the date and time to pick up food packages.
- F. Site Managers maintain the list of active participants and a wait- list.
- G. The Site Manager and/or trained staff members conduct eligibility interviews and certify participants.
- H. "And Justice for All" civil rights posters must be prominently displayed in an area of the facility frequented by applicants and participants.
- I. Outreach is a required component of CSFP.
- J. A proxy is any person designated by the participant to obtain a CSFP box on behalf of the participant. Each participant may identify individuals as their proxy --. Proxies must present identification and sign that the box was received in person. Participant and proxy signatures are verified by authorized personnel. Proxy data must be confirmed during recertification. Participants may change proxy at any time by completing a Participant Application form. Site Managers and persons involved in the management and/or distribution of the CSFP food packages may not be proxies.

Attachments

- A. Participant Application form
- B. Notice of Eligibility Determination Certification Status form
- C. Notice of Adverse Action form
- D. Participant Relocation form
- E. Distribution Site Process Guide
- F. Food Bank Warehouse ME Tool
- G. Distribution Site ME Tool
- H. Nutrition Education Survey
- I. Right to Fair Hearing Form
- J. FNS-191 - Racial and Ethnic Data Collection Form

**Illinois Department of Human Services
Commodity Supplemental Food Program**



PARTICIPANT APPLICATION

Is the applicant or any qualifying household member participating in CSFP at another site? Yes No

Improper use or receipt of CSFP benefits as a result of dual participation or other **program violations may lead to a claim against the individual** to recover the value of the benefits and may lead to disqualification from CSFP.

Name Of Applicant	Name Of Guardian (If Applicable)
--------------------------	---

Address (Must Verify Address)	City	State	Zip Code
--------------------------------------	-------------	--------------	-----------------

Telephone Number	Applicant's Date of Birth (Verify ID)	Total Number Living in Household: _____
-------------------------	--	--

Indicate the source and amount of current (last month's) income before any deductions, such as taxes and social security.

This amount must include income of all household members.
 "Other" income would include unemployment, strike benefits, income from trusts, contributions from relatives, etc.
 If last month's income is not representative of usual household income, also indicate household's average income during the previous 12 months.

Household Income	Amount	How Often	Annual Income
Source is:			
Source is:			
Source is:			
Total Household Income			

Changes must be Reported: Participants must report changes in household income or composition **within 10 days** after the change becomes known to the household.

Racial Ethnic Data

What is your ethnic category (select one) Hispanic or Latino Not Hispanic or Latino

What is your race? (Select one or more that apply) American Indian or Alaska Native Asian
 Black or African American Native Hawaiian or Other Pacific Islander White

Proxy: A proxy is a person authorized to receive CSFP benefits only. Proxies should be at least 18 years of age and dependable for the duration of the program. A proxy must present identification as well as written approval from the participant in order to be issued commodities. Proxies must sign for commodities. Proxies must follow the same program guidelines as CSFP participants.

I, _____ authorize the following individual(s) to act as my proxy.
 Participant signature

Assigned Proxy Name(s) (please print):

1) _____ 2) _____

(Continued on Next Page)

Before Signing, Be Aware of Your Rights and What Your Signature Means:

- Standards for participation in the Program are the same for everyone regardless of race, color, national origin, sex (including gender identity and sexual orientation), age and disability.
- You may appeal any decision made by the local agency regarding your denial or termination from the Program.
- If your application is approved, the local agency will make nutrition education available to you and you are encouraged to participate.

This application is being completed in connection with the receipt of Federal assistance. Program officials may verify information on this form. I am aware that deliberate misrepresentation may subject me to prosecution under applicable State and Federal statutes. I am also aware that I may not receive CSFP benefits at more than one CSFP site at the same time. Furthermore, I am aware that the information provided may be shared with other organizations to detect and prevent dual participation. I have been advised of my rights and obligations under the program. I certify that the information I have provided for my eligibility determination is correct to the best of my knowledge. I authorize the release of information provided on this application form to other organizations administering assistance programs for use in determining my eligibility for participation in other public assistance programs and for program outreach purposes.

Please indicate the decision by placing a checkmark in the appropriate box. Yes No

Signature of Applicant or Guardian	Date (Month/day/year)
Update Information, Sign and Date for Certification after on Wait List	Date (Month/day/year)

Agency Staff Complete:

Age Verified (check one): <input type="checkbox"/> Driver's License <input type="checkbox"/> Picture ID Card <input type="checkbox"/> Other: _____	Address Verified <input type="checkbox"/> Yes <input type="checkbox"/> No	Applicant Eligible <input type="checkbox"/> Yes <input type="checkbox"/> No	Caseload Available <input type="checkbox"/> Yes <input type="checkbox"/> No	Date written notice was given: <input type="checkbox"/> Outreach Provided <input type="checkbox"/> Outreach Refused
--	--	--	--	--

Staff Signature & Title of Certifying Official:

Date Certified:	2nd Year Verification Date:	3rd Year Verification Date:
------------------------	---	---

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are 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 in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](http://www.ascr.usda.gov/complaint_filing_cust.html), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- fax: (202) 690-7442; or
- email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Illinois DHS Commodity Supplemental Food Program



Notice of Eligibility Determination and Certification Status

Standards for participation in the Program are the same for everyone regardless of race, color, national origin, sex, age, and disability.

Applicant's Last Name: _____ First Name: _____
Address: _____

Eligibility Determination

_____ You are eligible to receive CSFP benefits for the period starting the month of _____ and ending the month of _____. Information regarding the time, location, and means of food distribution is attached. You are not required to provide payment to participate in the CSFP program.

_____ You are eligible to receive CSFP benefits however, we are at maximum caseload and are unable to process your application currently. You will be placed on a waiting list and contacted when openings become available.

_____ You are NOT eligible to receive CSFP benefits based on information provided on your application.

Reason NOT eligible: ___ Income above 130% Federal Income Guideline. ___ Under 60 years of age.
___ County of residency not served.

Waiting List Notification:

_____ We have caseload openings now. Please be informed it is time to re-determine your eligibility for the CSFP. Please complete the enclosed forms and bring them and the applicant listed above to our office located at the address above during the hours of _____ - _____ on this day or days _____

Notice of Expiration of Certification Period:

_____ Your eligibility for CSFP benefits are about to expire effective the last day of the month of _____. Contact the CSFP Certifying Agency listed below for additional information.

Certifying Agency & Address: _____

Days & Hours of Operation: _____

Staff Signature: _____ **Date:** _____

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are 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 in any program or activity conducted or funded by USDA. Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter 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;

- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Illinois Department of Human Services
Commodity Supplemental Food Program



NOTICE OF ADVERSE ACTION

Standards for participation in the Program are the same for everyone regardless of race, color, national origin, sex, age, and disability.

Name of Applicant or Participant: _____

Address: _____

This is to inform you that the following action will be taken regarding your participation in CSFP:

Your CSFP benefits are being discontinued effective _____ for the reason listed below.

You are disqualified to receive CSFP benefits for the reason listed below.
The period of disqualification is from _____ to _____.

The reason for this action is:

Certifying Agency: _____ Date: _____

Certifying Agency Address: _____

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are 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 in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter 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;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.



**Illinois Department of Human Services
Commodity Supplemental Food Program**

PARTICIPANT RELOCATING (VERIFICATION OF CERTIFICATION) FORM

Name of Participant: _____

Date Certified: _____

Date Certification Expires: _____

Verification Statement:

The participant named above has expressed intent to relocate and is eligible to participate in the Commodity Supplemental Food Program until the stated expiration date. This Participant Relocating (Verification of Certification) form shall be accepted as proof of eligibility for Program benefits.

If a waiting list exists at the receiving local agency, the named participant shall be placed on the list ahead of all waiting applicants.

The CSFP Participant Application for the participant named above is on file at:

Agency Name

Agency address

Zip Code

Staff Signature

Date:

Staff Title

(Please print or type)

Illinois CSFP Distribution Sites Process Guide



Updated 9/26/19

Situation	Form Used	Results	
Applicant applies / inquiries about participation	Applicant completes Participant Application Form (Participant must complete an Application form each year)	Agency completes <i>Agency Staff</i> section on form and determines <ul style="list-style-type: none"> • If applicant is eligible • If caseload space is available for eligible applicant 	Applicant must be notified of eligibility/ineligibility/placed on wait list within 10 day from date of Participant Application
Applicant is eligible & caseload available	Agency completes Notice of Certification Status and identifies starting and ending month	Participant receives the Notice of Certification Status form with their start and end dates within 10 days of Participant Application	Applicant is certified for up to 3 years
Applicant is eligible, but caseload is not available	Agency completes Notice of Certification Status, Eligibility Determination and checks that applicant being placed on wait list	Applicant receives the Notice of Certification Status form within 10 days notifying them that they are on the wait list. Applicant is added to agency's wait list	
Wait List	Agency creates a wait list with applicant name(s) and date	Applicant is notified of placement on wait list within 10 days of their request for benefits	(Wait List – record name & date placed on Wait List and kept in a file folder, on clipboard or in notebook)
Applicant is not eligible	Agency completes the Notice of Adverse Action form	Applicant is given the Notice of Adverse Action form within 10 days which indicates why they are ineligible and the reason for this action	If applicant request a fair hearing, they complete the bottom portion of Notice of Adverse Action form and submits to certifying agency
Fair Hearing	Agency receives a Notice of Adverse Action for a Fair Hearing	Participant has 60 days from date of mailed or received Notice of Adverse Action form to request a fair hearing. Participant appeals discontinuance of program benefits within a 15-day advanced notification period	Agency must provide participant with at least 10 days' advance written notice of the time and place of the hearing. Participant continues receiving food package until decision is made by hearing official or until end of participant's certification period

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**



FOOD BANK WAREHOUSE

Warehouse Name:	Date of Review:
Warehouse Address:	
Contact Person:	Phone Number:

See Management Evaluation Pre-Visit Information for additional agency and employee information.

§247.28	POLICY	MET	NOT MET	N/A	DEPARTMENT FINDINGS
	The agency has a policy for the following:				
§247.28a	Food loss due to theft, spoilage, use in food demonstrations, expiration, and damages.				
§247.28b	Filing a complaint of discrimination.				
§247.37	To ensure that all civil rights requirements are being met.				
§247.9a	For determining eligibility to CSFP.				
§247.12a, §247.15a, §247.15b	For notification of eligibility or ineligibility or placement on waitlist.				
§247.12a1, §247.17a, §247.17b, §247.33	For notification of termination or discontinuance and rights to a fair hearing.				
§247.10a	For distribution of commodities.				
§247.30	Instructing local agencies to initiate claims against any participant who fraudulently receives or uses USDA foods?				
§247.12a2	For making nutrition education available.				
§247.13a, §247.13b	For ensuring non-English speaking persons are aware of their rights and other program information.				
§247.18	For preventing and detecting dual participation.				
****	For assigning caseloads to local agency for distribution.				
§247.10b	For issuing and/or using a proxy.				
****	For substitution of food when a product is not in stock.				

CITATION	NUTRITION EDUCATION	MET	NOT MET	N/A	DEPARTMENT FINDINGS
----------	---------------------	-----	---------	-----	---------------------

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

§247.18d	Food tastings or demonstrations conducted.				
§247.18a	Commodity foods are used during tastings or demonstration.				
§247.18c	Nutrition education materials are developed for CSFP participants				
§247.18a	Participants been surveyed to determine their nutrition education needs.				
§247.18a	Nutrition education is provided each month.				
§247.18b1-3, 5-6	Nutrition education provided includes information on the following:				
	1) nutritional value of CSFP foods				
	2) the relationship of CSFP foods to overall dietary needs of the elderly				
	3) nutritious ways to use CSFP foods				
	4) special nutritional needs of elderly and how these needs may be met				
	5) the importance of health care and the role nutrition plays in good health				
	6) the importance of the use of the foods by the participant to whom they are distributed				
§247.18a	Nutrition education is evaluated for effectiveness.				
§247.18b	Ethnic cultural characteristics are considered when delivering nutrition and health information. Examples: Language and Cultural eating practices.				

	STORAGE AND INVENTORY OF COMMODITIES	MET	NOT MET	N/A	DEPARTMENT FINDINGS
	Food containers are kept 6 inches off the floor and stored on pallets or shelves to protect from contamination.				
	Food and containers of food are stored away from exposed or unprotected sewer or water lines, except for automatic fire protection sprinkler heads.				
	Containers are stored on dollies, racks or pallets and are easily movable.				
	Packaged food is stored with no contact with water or un-drained ice.				
§250.14b	Commodities are stored to distinguish them from other foods in storage.				

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

	FOOD SAFETY and PROTECTION	MET	NOT MET	N/A	DEPARTMENT FINDINGS
	There are enough conveniently located refrigerators or insulated facilities to assure the maintenance of potentially hazardous food at required temperatures (i.e. cheese).				
	Each mechanically refrigerated storage facility has a numerically scaled indicating thermometer accurate to +/- 3°F.				
	Potentially hazardous products (i.e. cheese) are stored at a temperature of 41 °F or below.				
	Record Temperatures: DRY AREA: °F COOLER: °F				
§250.14	Facilities handle, store and distribute foods which are sanitary and free from rodent, bird, insect and other animal infestation.				

§250.14	WAREHOUSING, STORAGE AND DISTRIBUTION OF COMMODITIES	MET	NOT MET	N/A	DEPARTMENT FINDINGS
§250.14	1. Safeguard against theft, spoilage and other loss (i.e. locks, functioning refrigerator)				
§250.14	2. Maintain foods at proper storage temperatures (<41°F for cheese)				
§250.14	3. Allow foods to be stored such that USDA foods are easily identified				
	4. Allow food to be stored at least 6 inches off the floor for ventilation				
§250.14	5. Other protective measures are taken as necessary.				

	SAFETY AND PHYSICAL INSPECTION	MET	NOT MET	N/A	DEPARTMENT FINDINGS
	The condition of the food is satisfactory (i.e. no torn boxes or bags, no dented cans, no opened jars).				
	Food is not beyond the expiration date.				
	There are adequate fire extinguishers throughout the facility.				
	There is an alarm system.				
	There is a sprinkler system.				
	The floor, walls, and ceiling are sanitary and clean.				
	There is adequate lighting in the facility.				

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

	There are no potentially hazardous or unsanitary conditions evident in the warehouse.				
	Only food is being stored in the warehouse.				

	DOCUMENTATION OF INVENTORY	MET	NOT MET	N/A	DEPARTMENT FINDINGS
§247.28b	Documentation of physical inventory?				Month/Year completed:
§247.28b	Documentation of monthly inventory including:				
	Food Commodity Name and Code				
	a. Beginning Inventory				
	b. Receipt of Shipment				
	c. Transfers				
	d. Amount Issued				
	e. Food Loss				
	f. Amount Used for Nutrition Education				
	g. Positive and/or Negative Adjustments				
	h. Ending Inventory (153 Report)				
	Is the correct number of commodity items (i.e. juice, cereal, etc.) issued to clients each month and documented in the 153 Inventory Report				

Citation	DOCUMENTATION OF EXPENDITURES	MET	NOT MET	N/A	DEPARTMENT FINDINGS
IL Admin Code 509	Review last quarter of Summary Expenditure Document Forms (EDFs) and supporting documentation				Date:
§247.25a	All expenses are allowable in accordance with the following standards:				
	1. Storing, transporting, and distributing foods.				
	2. Determining the eligibility of program applicants.				
	3. Program outreach (only if agency is NOT at caseload).				
	4. Nutrition education (i.e. newsletters, brochures, social media).				
	5. Audits and fair hearings.				
	6. Monitoring and review of program operations.				
	7. Transportation of participants to and from the agency if necessary.				

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

	REPORTS & RECORDKEEPING	MET	NOT MET	N/A	DEPARTMENT FINDINGS
	Copy of current IDHS contract on file?				
§247.4b2	Copy of current contract with subcontractor(s) on file?				
§247.4b2	All financial records and reports are maintained for a minimum of three (3) years from the end of the fiscal year to which they pertain after a successful audit.				
	Physical inventory is conducted at least every two years for capital equipment paid partially or fully with CSFP funds.				
§247.4b3	Agency has a statement that the agency is responsible for any loss resulting from improper distribution, or improper storage, care, or handling of commodities.				
	There is a process for requesting and approving supplies and equipment for CSFP program.				
§247.25(c)	Was prior approval obtained from IDHS for expenditures with a cost per unit of at least \$5,000?				
	Where equipment costs are shared by several programs, these costs are allocated (i.e. cost-shared) and documented appropriately.				
§247.29a	Agency maintains accurate records related to the following:				
	1. The receipt, disposal, and inventory of commodities;				
	2. The receipt and disbursement of administrative funds and other funds;				
	3. Liability for any improper distribution, loss, use, damage to commodities;				
	4. The results obtained from the pursuit of claims arising in favor of the State or Local agency				

Please list any general comments in the space provided below:

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**



DISTRIBUTION SITE

Site Name:		Date of Review:	
Site Address:			
Contact Person:		Phone Number:	
Number of Staff:	Caseload Number:	Waitlist Number:	

	STORAGE AND INVENTORY OF COMMODITIES	MET	NOT MET	N/A	Department Findings
	Food containers are kept 6 inches off the floor and stored on pallets or shelves to protect from contamination.				
	Food and containers of food are stored away from exposed or unprotected sewer or water lines, except for automatic fire protection sprinkler heads.				
	Packaged food is stored with no contact with water or un-drained ice.				
	Food Safety and Protection	MET	NOT MET	N/A	Department Findings
	Potentially hazardous products (cheese) are stored at a temperature of 41°F or below.				
	Record Temperatures: DRY AREA: °F COOLER: °F				
	PHYSICAL INSPECTION & INVENTORY	MET	NOT MET	N/A	Department Findings
	The condition of the food is satisfactory (no torn boxes, bags, dented cans or opened jars).				
	Food is not beyond the expiration date.				
	There are adequate fire extinguishers throughout the facility.				
	There are no potentially hazardous or unsanitary conditions evident in the distribution site.				
FR 247.28	Commodities are checked regularly for spoilage, damage, destruction or other loss.				
FR 247.28	Prepacked commodities are verified and documented upon arrival of outreach sites.				
FR 247.28	The Warehouse documents physical inventory of commodities.				

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

FR 247	Eligibility, Certification, and Notification	MET	NOT MET	N/A	Department Findings
	All participant applications are complete and on file.				
FR 247.9	All participants are eligible as defined as an elderly person at least 60 years of age.				
FR 247.9	Current income guidelines are being utilized.				
	Residency is verified and resides within county of service				
§247.14a (1-3)	All applicants are provided with information on the following public assistance programs and make referrals, as appropriate: (1) Supplemental security income benefits provided under Title XVI of the Social Security Act (<u>42 U.S.C. 1381 et seq.</u>); (2) Medical assistance provided under Title XIX of the Social Security Act (<u>42 U.S.C. 1396 et seq.</u>), including medical assistance provided to a qualified Medicare beneficiary (<u>42 U.S.C. 1395(p)</u> and <u>1396d(5)</u>); and (3) The Supplemental Nutrition Assistance Program (<u>7 U.S.C. 2011 et seq.</u>).				
247.15a	Applicant is given notification of eligibility or ineligibility or placement on wait list within 10 days of application.				
§247.15b	The notice of eligibility or ineligibility includes all the following in writing:				
	Information on time, location and means of food distribution				
	Length of certification period				
	The reason applicant is not eligible				
	The individual's right to a fair hearing to appeal the decision				
	Statement that informs the applicant that program standards are applied without discrimination by race, color, national origin, age, sex (including gender identity and sexual orientation) or disability				
	Local agencies do not require payment from eligible participants to receive USDA foods.				
247.16a	A system is in place to verify termination dates and ensure that participants are certified annually.				
247.19a	Staff inquires if client is already being served by CSFP.				
247.21	Staff checks for dual participation and performs follow-up.				
247.17	Written notification of discontinuance given at least 15 days prior to effective date if:				

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

247.17a	participant is no longer eligible during their certification period				
247.17b	there are insufficient resources (e.g. there is a reduction in caseload slots)				
247.17c	The written notification of discontinuance includes the following?				
	effective date of discontinuance				
	reason for discontinuance				
	statement of individual's right to appeal through fair hearing process				
	statement that informs program standards are applied without discrimination by race, color, age, sex or disability				
	ISSUANCE	MET	NOT MET	N/A	Department Findings
	A system is in place to ensure an adequate supply of commodities is received from the central warehouse to distribute to participants each month.				
	Staff distributes one prepackaged food package per participant.				
247.10	Staff provides proper quantities/types of foods.				
	Staff substitutes food properly when a product is not in stock.				
247.10b	Staff verifies identification (ID card) for eligibility, signature match.				
Catholic Charities only	If client has no ID card, master client list is referred to and is proof of ID requested.				
247.10b	If Proxy is picking up their ID is verified.				
Catholic Charities only	Lost ID cards are handled according to local agency policy.				
	The site follows up on "no-shows."				
FR 247	NUTRITION EDUCATION	MET	NOT MET	N/A	Department Findings
247.18d	Food tastings or demonstrations conducted.				
247.18a	Commodity foods are used during tastings or demonstration.				
247.18c	Nutrition education materials are developed for CSFP participants				
247.18a	Participants been surveyed to determine their nutrition education needs.				
247.18a	Nutrition education is provided each month.				
247.18b1-3, 5-6	Nutrition education provided includes information on the following:				

**Illinois Department of Human Services
Commodity Supplemental Food Program (CSFP)
Management Evaluation Tool**

	Nutritional value of CSFP foods				
	The relationship of CSFP foods to overall dietary needs of the elderly				
	Nutritious ways to use CSFP foods				
	Special nutritional needs of elderly and how these needs may be met				
	The importance of health care and the role nutrition plays in good health				
	The importance of the use of the foods by the participant to whom they are distributed				
247.18a	Nutrition education is evaluated for effectiveness.				
247.18b	Ethnic and cultural characteristics are considered when delivering nutrition and health information. Examples: Language and Cultural eating practices.				
	REPORTS & RECORDKEEPING	MET	NOT MET	N/A	Department Findings
247.29a	Agency maintains accurate records related to the following: Receipt, disposal, and inventory of commodities;				
	Receipt and disbursement of administrative funds and other funds;				
	Eligibility determinations;				
	Fair hearings and other program activities;				
	Liability for any improper distribution, loss, use, damage to commodities;				
	Results obtained from the pursuit of claims arising in favor of the State or Local agency				

Please list any general comments in the space provided below:



Illinois DHS Commodity Supplemental Food Program (CSFP) Participant Nutrition Education Survey

The CSFP program would like to know how to better meet your nutrition preferences and nutrition education needs. To serve you better, we ask for you to answer the questions below. Your answers will be kept confidential. If you need help with answering the questions, please ask a staff person to assist you.

1. What CSFP foods do you NOT use or have left over each month (Check all that apply)

- | | | |
|--|--|--|
| <input type="checkbox"/> Dry Milk | <input type="checkbox"/> Brown Rice | <input type="checkbox"/> Canned Vegetables |
| <input type="checkbox"/> Shelf-Stable Milk | <input type="checkbox"/> Dry Cereal | <input type="checkbox"/> Canned Fruit |
| <input type="checkbox"/> Cheese | <input type="checkbox"/> Farina/Hot Cereal | <input type="checkbox"/> Bottled Juice |
| <input type="checkbox"/> White Pasta | <input type="checkbox"/> Chicken Products | <input type="checkbox"/> Spaghetti Sauce |
| <input type="checkbox"/> Brown Pasta | <input type="checkbox"/> Beef Products | <input type="checkbox"/> Beans/Legumes |
| <input type="checkbox"/> White Rice | <input type="checkbox"/> Fish Products | |

2. What amount of your CSFP food package do you use in one month's time?

- 25% 50% or half 75% 100%, I use all my CSFP foods

3. Are the recipes and/or nutrition information you receive from the newsletter helpful to you?

- Very helpful
 Fairly helpful
 Not helpful
 I have not received any recipes or nutrition information

4. I would like to see more nutrition education topics about (Check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Diabetic-Friendly Eating | <input type="checkbox"/> MyPlate for Older Adults |
| <input type="checkbox"/> Heart-Healthy Eating/Low Sodium | <input type="checkbox"/> How to read/understand nutrition facts labels |
| <input type="checkbox"/> Vitamins and Minerals | <input type="checkbox"/> Nutritional content and benefits of CSFP foods |
| <input type="checkbox"/> Recipes using the CSFP foods | <input type="checkbox"/> Meal Planning |
| <input type="checkbox"/> Cultural/Ethnic Recipes using the CSFP foods | <input type="checkbox"/> Food Safety |

5. How satisfied are you with the Commodity Supplemental Food Program?

- Very satisfied
 Satisfied
 Neutral
 Unsatisfied
 Very Unsatisfied

**Illinois Department of Human Services
Commodity Supplemental Food Program**



RIGHT TO FAIR HEARINGS

You have a right to request a fair hearing if you do not agree with the action taken. You must request a hearing within 60 days from the date of the NOTICE OF ADVERSE ACTION is mailed.

Your request for a fair hearing must be made verbally or in writing to the certifying agency listed on the NOTICE OF ADVERSE ACTION form.

Please complete the information below and mail or deliver to the certifying agency.

If you have been notified of discontinuance or disqualification for CSFP participation and you request a fair hearing prior to the effective date indicated on the NOTICE OF ADVERSE ACTION form, you may continue to receive benefits until a hearing decision is announced or until the end of your current certification period, whichever is first.

However, if the Agency is upheld in its decision, a claim against the household shall be established for all over-issuance of USDA foods.

I wish to request a fair hearing YES NO

Name: _____

Phone: _____

Address: _____

City, State, ZIP: _____

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are 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 in any program or activity conducted or funded by USDA. Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](http://www.ascr.usda.gov/complaint_filing_cust.html), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter 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;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

U.S. DEPARTMENT OF AGRICULTURE - FOOD AND NUTRITION SERVICE

**RACIAL/ETHNIC GROUP PARTICIPATION
 COMMODITY SUPPLEMENTAL FOOD PROGRAM**

FNS INSTRUCTION 113-1



1. STATE 2. STATE # L/A # NO. OF SITES

3. REPORTING LOCAL AGENCY NAME
 ADDRESS
 CITY
 STATE ZIP CODE
 TELEPHONE NUMBER

4. REPORTING YEAR: APRIL

PARTICIPANTS FOR THE MONTH OF APRIL		COLUMN A	COLUMN B
		TOTAL NUMBER OF PARTICIPANTS BY RACE	NUMBER OF HISPANIC OR LATINO PARTICIPANTS REPORTED IN COLUMN A BY RACE
PARTICIPANTS WHO MARKED ONLY ONE RACE	5. AMERICAN INDIAN OR ALASKA NATIVE	<input type="text"/>	<input type="text"/>
	6. ASIAN	<input type="text"/>	<input type="text"/>
	7. BLACK OR AFRICAN AMERICAN	<input type="text"/>	<input type="text"/>
	8. NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	<input type="text"/>	<input type="text"/>
	9. WHITE	<input type="text"/>	<input type="text"/>
PARTICIPANTS WHO MARKED TWO RACES	10. AMERICAN INDIAN OR ALASKA NATIVE AND WHITE	<input type="text"/>	<input type="text"/>
	11. ASIAN AND WHITE	<input type="text"/>	<input type="text"/>
	12. BLACK OR AFRICAN AMERICAN AND WHITE	<input type="text"/>	<input type="text"/>
	13. AMERICAN INDIAN OR ALASKA NATIVE AND BLACK OR AFRICAN AMERICAN	<input type="text"/>	<input type="text"/>
	14. BALANCE REPORTING MORE THAN ONE RACE	<input type="text"/>	<input type="text"/>
	15. TOTAL (ADD ITEMS 5 THRU 14)	<input type="text"/>	<input type="text"/>

16. REMARKS

DATE TITLE SIGNATURE

INSTRUCTIONS

This report will be prepared annually covering the month of April.

LOCAL AGENCIES - Must submit the data to the State agency by the due date established by the State.

STATE AGENCIES - Must determine that the data has been received from all local agencies. The data must be submitted to the appropriate FNS Regional Office by the 31st of July.

FNS REGIONAL OFFICES - Must determine that the data has been received from all State and local agencies. The FNS Regional Office must ensure that all data is posted into the Food Programs Reporting System database by the 19th of September.

Item 1. Self-explanatory.

Item 2. For the State agency, enter the seven-digit State agency code. For the local agency, enter the 10-digit identification number assigned by FNS. New local agencies must obtain an identification number from FNS. Enter the number (001 or more) of sites under each local agency's supervision.

Items 3, 4 and 16. Self-explanatory.

Items 5-15. Report for each racial group the number of participants who received program commodities in April. For purposes of this form, "Hispanic or Latino" is an ethnic group, not a race. In Column A, report the total number of participants by race, including individuals of Hispanic or Latino origin. In Column B, report only participants of Hispanic or Latino origin by race. The form is requesting separate counts for participants who chose only one race and those who chose more than one race.

For item 14, report the total number of participants who chose racial combinations that are *not included* in items 10 through 13.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0025. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.