

# PARTNER AGENCY DISTRIBUTION PROCEDURES

Updated: June 26, 2018



## **Distribution Space**

TEFAP distributions must be open to the general public. Food pantries are required to determine the income eligibility of any client who wishes to receive USDA TEFAP foods, and food will be distributed only to recipients who are eligible to receive them.

The “Justice for All” civil rights poster must be posted in an unobstructed location that is visible to clients. The current poster is green. All older versions of this poster must be removed.

Partners must have print copies of the “TEFAP Participant Rights & Responsibilities” available during intake.

Program Partners must protect the confidentiality of any information that has been provided on an application for eligibility, whether the application is paper or electronic. The intake and recertification processes must be conducted in an environment that would ensure confidentiality. Clients completing their own forms should be allowed a physical space in which others will not see their information. Intake workers completing intake on a client’s behalf should do so in a separate area where they will not be overheard.

## **Disability Accommodations**

The Food Bank requires all partner agencies to provide reasonable accommodations to clients with disabilities during food distributions. If distribution locations are inaccessible for individuals with disabilities, all services must still be provided (deliver to car, etc.)

## **Faith-Based Organizations**

Religious or faith-based Partners must prominently post English and Spanish versions of the “Written Notice of Beneficiary Rights” near the “And Justice for All” poster. . Sites must display the TEFAP Written Notice of Beneficiary Rights near the “And Justice for All” poster to inform participants of the following information:

- The site must not discriminate against participants on the basis of religion or religious belief; a refusal to hold a religious belief; or a refusal to attend or participate in a religious practice.
- The site must not require participants to attend or participate in any explicitly religious activities. Participants’ participation in these activities must be purely voluntary.
- The site must separate, in time or in location, any privately funded, explicitly religious activities from activities supported with USDA direct assistance.
- If the participant objects to the religious character of the site, then the site must make reasonable efforts to make a referral to an alternative provider to which the participant has no objection, with the understanding that the site cannot guarantee that an alternate provider will be available in every instance.

- Applicants and participants may report violations of these protections (including denials of services or benefits) to TDA at [www.Squaremeals.org](http://www.Squaremeals.org).

Upon the request of a participant, Partner Agencies must provide a copy of the written notice.

When an applicant or participant objects to the religious character of a site, the site must make reasonable efforts to refer them to an alternative site. “Reasonable efforts” depend on the situation. At a minimum, the Partner Agency must 1) attempt to identify an alternative provider and 2) determine the service that the provider offers. A referral may be made to non-USDA funded providers if necessary and if the provider has the capacity to accept the beneficiary.

The TEFAP and CSFP Beneficiary Referral Request form documents the referral efforts. Copies of the form must be easily available at each site. The Partner Agency must keep the Referral Request onsite for 3 years. Upon request, referral records must be made available to TDA, CEs, and subdistributing agencies (as applicable).

If the Partner is unable to locate an appropriate organization to refer the client to then they should refer the client to the Food Bank for further assistance.

### **Application Process**

Partners must register and qualify clients to participate in using the Client Intake Form. Partners may use their own site-specific form or database for intake as long as they do not require any information other than:

- Name
- Address
- Number of people in household
- The basis for eligibility

A client may sign up their entire household to receive assistance. A household is made up of all the residents at an address who share resources such as food and money. Roommates, family members, etc. who live at the address but who do not share resources with the client are considered a separate household. Clients who are homeless or transient do not need to provide an address.

There are no citizenship requirements. Partner Agencies must not request nor require any applicant or participant to prove citizenship through any means whatsoever.

If a client does not live in your agency’s service area, the client must be referred to a different site in their service area. The Food Bank suggests providing emergency food assistance to individuals before referring them elsewhere.

Partners must clarify the following points to applicants and participants:

1. The inability or unwillingness to provide proof of ID, Residency, or Income is not a barrier to participation.
2. Participants will receive USDA Foods without proof of ID, Residency, or Income

Partners may request but cannot require other information to qualify clients for TEFAP, including proof of identification, income, residence, citizenship or legal status, and social security number. Partner agencies may collect additional data (such as social security numbers) for other services – for example, clothing aid or assistance with bills. The federally required information to determine USDA TEFAP eligibility must be collected before the Partner requests additional data. The collection of additional data must not be a real or perceived barrier to participation in USDA TEFAP.

### **Determining Eligibility**

A household is automatically (or categorically) eligible for USDA Foods if it currently receives assistance from one of the following programs:

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Supplemental Security Income (SSI)
- National School Lunch Program (NSLP)
- Non-institutional Medicaid

If a client’s household does not receive one of those federal benefits, they may qualify on the basis of income. Clients should self-report household income. Partners may request but not require proof of income. A client can qualify for TEFAP distributions if their household’s self-reported income is equal to or lower than 185% of the current Federal Poverty Guidelines. This chart is indicated in the annual TEFAP Income Eligibility Guidelines. Partners may not impose their own eligibility criteria.

Clients who earn more than 185% of the federal poverty guidelines are asked to indicate that they are in an emergency need for food on the intake form. If the client indicates that they are in emergency need, they are able to receive USDA TEFAP food for a period from 1 to 6 months. This time frame can be decided by the intake counselor but cannot exceed 6 months per emergency case without TDA approval.

#### **Characteristics of a Household Crisis**

1. Unexpected
2. Temporary
3. Beyond the household’s control

#### **Unexpected Costs of a Household Crisis**

1. Necessary medical treatment of a household member
2. Burial expenses of a household member
3. Uncontrolled loss of employment
4. The repair or replacement, because of a household disaster, of the household’s
  - home,
  - home contents, or
  - vehicle

If the client does not wish to indicate that they are in an emergency, the client cannot receive USDA TEFAP food. Partners should use recent invoices to decipher what food product is USDA TEFAP product. In general, ALL clients should receive USDA TEFAP food unless they do not wish to declare they are in emergency need for food.

Once one qualifying reason for food need is established, the intake worker cannot require further qualifying reasons (i.e. if a client participates receives a qualifying form of government assistance, they should not be asked about their income).

Intake records must indicate the beginning month/year and ending month/year of the client's certification period. Intake workers must sign and date the record to certify it.

### **The Proxy**

A proxy is a person designated by a participant to act for the participant as necessary throughout every process of TEFAP. For example, proxies can provide a signature on forms. Proxies may also act for the participant at application, certification, food package distribution, and recertification. A proxy must provide proof of identification prior to picking up a food package.

Intake workers should make sure that TEFAP applicants are aware of the option to designate proxies. The Partner must maintain each written proxy designation and their address on file. There may be a maximum of two proxies per client. Proxy identification must be reviewed at each application, certification, food package distribution, and recertification.

There are two ways to change a proxy:

1. In a written, signed statement
2. In person at the Partner's site, where proxy changes are noted and maintained in the Partner's records.
3. To pick up food for a client, the proxy must present identification at every distribution verifying that they are the proxy indicated on the Client Intake Form. The proxy must also indicate their status on the Sign-In sheet at every distribution they attend. Additionally, the site is responsible for calling each client the first time that a proxy picks up on his or her behalf to verify that the client received food.

### **Recertification**

To continue receiving USDA Foods after a certification period has ended, the household must be recertified by reapplying and meeting eligibility requirements again. A certification period begins the first month the household receives the USDA Foods, and may not exceed 12 months. For clients who qualify on the basis of emergency need, a certification period begins the first month the household receives the USDA Foods, and may not exceed 6 months without TDA approval.