



HOPE

Healthy Options Program for the Elderly

PROGRAM GUIDELINES

Updated: August 2020

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Latest updates to the HOPE Policies & Procedures Manual

January 2020:

- Updated section 2C, Contact Information
- Updated points of contact throughout the manual as needed

August 2020:

- Changed refer to manual as HOPE Guidelines instead of Policies and Procedures
- Updated where Agency Relations staff needs to be contacted where applicable throughout manual
- Updated the Appeals process to include the Agency Services Director

1. About the Central Texas Food Bank & HOPE

The Central Texas Food Bank (Food Bank) is a 501(c)(3) organization that delivers food, nutrition education, and social services outreach through a network of Partner Agencies and HOPE Partners across 21 Central Texas counties. The Food Bank's mission is to nourish hungry people and lead the community in ending hunger.

The Central Texas Food Bank is required to enforce Feeding America, USDA, Texas Department of Agriculture (TDA), and IRS guidelines, as well as those approved by Food Bank leadership.

The mission of the Healthy Options Program for the Elderly (HOPE) is to reduce hunger among low-income seniors age 55 and older by providing them with free monthly distributions of nutritious food. Each month, HOPE clients receive 15- to 20-lb of shelf-stable grocery items to supplement their diets.

HOPE is one of the Food Bank's food distribution programs. It is coordinated by the Distribution Programs Team, which is part of the Programs Department. (For more information on staff and contact information, [see page 5.](#))

a. USDA/TEFAP/TDA

The Food Bank receives staple food items, such as shelf-stable milk, rice, beans, cereal, and canned goods through The Emergency Food Assistance Program (TEFAP), which is a federal emergency food program administered through the US Department of Agriculture (USDA). These products are provided at no cost to the Food Bank. Because HOPE distributes TEFAP product, the HOPE

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Program must follow TEFAP rules and regulations and is subject to USDA and Texas Department of Agriculture (TDA) audits.

For more information on TEFAP in Texas, visit

squaremeals.org/Programs/TheEmergencyFoodAssistanceProgram.aspx.

The TEFAP Handbook is available at

squaremeals.org/Programs/TheEmergencyFoodAssistanceProgram/TEFAPPolicyandHandbook.aspx. The policies outlined in the handbook dictate Food Bank policy.

b. Feeding America & the Senior Grocery Program



The Central Texas Food Bank is a member of Feeding Texas and its parent organization, Feeding America. This national nonprofit's mission is "to feed America's hungry through a nationwide network of member food banks and engage our country in the fight to end hunger."

Feeding America operates almost as a food bank for food banks. As a member, the Central Texas Food Bank has access to a powerful network and important resources, but the Food Bank also commits to meet Feeding America's high standards for membership. The HOPE Program must follow Feeding America requirements and is subject to Feeding America audits.

HOPE is part of Feeding America's Senior Grocery Program, meaning that the Food Bank uses Feeding America's requirements and best practices in running the program.

For more information on Feeding America, visit feedingamerica.org.

For more information on the Senior Grocery Program, visit feedingamerica.org/our-work/hunger-relief-programs/.

c. HOPE Contact Information

Physical address: 6500 Metropolis Dr., Austin, TX 78744

Telephone Number: (512) 282-2111

Fax: (512) 282-6606

centraltexasfoodbank.org

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2. Being a HOPE Partner

A HOPE Partner is an organization who agrees to host or take responsibility for the execution of HOPE in partnership with the Food Bank. In signing the Letter of Agreement, HOPE Partners are agreeing to abide by the rules and regulations set forth in the Partner Program Guidelines as well as the Letter of Agreement

a. Requirements

HOPE Partners must be good stewards of the donated commodities entrusted to them from the Food Bank. Please read this section carefully to fully understand the Food Bank’s expectations of HOPE Partners.

- Abide by Central Texas Food Bank, USDA, and TDA policies, procedures, and requirements.
- Distribute the HOPE product received from the Food Bank free of cost to any and all qualifying clients. (For eligibility guidelines, [see page 25](#)).
- Ensure the safe and proper handling of food product, which conforms to all local, state and Federal regulations.
- Ensure that no senior is discriminated against on the basis of race, color, religion, national origin, disability, sex, sexual orientation, political affiliation, or age (except the minimum age requirement of 55 to participate in HOPE).
- Ensure that all staff and volunteers show respect to all HOPE clients. Inferior, degrading or otherwise disrespectful communication to clients will not be tolerated.
- Allow the Food Bank, the TDA, USDA, and Feeding America to monitor their food distributions as requested.

b. Costs

There is no cost to be a HOPE Partner, to receive HOPE product, or to get deliveries. However, HOPE Partners are expected to pay any expenses incurred in the operation of the HOPE Program (e.g. Food Handler Training, supplies, storage facilities).

c. HOPE Partner Leadership / Roles

Each HOPE Partner must designate a HOPE Partner Lead, a Primary Site Leader, and a Secondary Site Leader. These roles should be filled by staff members of the HOPE Partner organization and/or committed, reliable volunteer who are in good standing with the organization and have its full backing and support.

A HOPE Partner Lead may double as a Primary or Secondary Site Leader, but the HOPE Partner must have at least two HOPE representatives. The HOPE Partner is responsible for maintaining a HOPE Partner Lead, Primary Site Leader, and Secondary Site Leader with the roles split between no fewer than two people at all times.

i. HOPE Partner Lead

A HOPE Partner Lead is the official point of contact for the HOPE Partner.

ii. Primary Site Leader

A Primary Site Leader is the formal representative from the HOPE Partner for HOPE and works in close collaboration with local volunteers and/or staff to ensure the success of the HOPE distribution.

iii. Secondary Site Leader

A Secondary Site Leader is a representative of the HOPE Partner for HOPE and will serve as the Site Leader in the event the Primary Site Leader cannot fulfill their role.

iv. Volunteers

Volunteers are essential to the successful operation of the HOPE Program—in fact, many HOPE Partners are run entirely by volunteers. The Distribution Programs team appreciates these volunteers' commitment to improving the lives of seniors in their communities.

HOPE Partners that do not have sufficient staff support to conduct HOPE distributions are responsible for recruiting volunteers to assist the Primary Site Leader. For help recruiting volunteers, please contact Distribution Programs.

There is no firm requirement on the number of volunteers or staff needed to run a quality HOPE distribution because volunteer needs generally vary based on the number of HOPE clients being served and the general layout of the distribution.

Volunteers must undergo all the trainings required for their work ([see page 20](#)).

1. Tracking Volunteers

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The HOPE Partner is not required to maintain a sign-in list, roster, or record of hours served by volunteers, although they are allowed to do so. The only volunteer-related records that the Food Bank requires are training logs. Like most other records, these training logs must be saved for 3 years.

2. Volunteers who also receive HOPE food

The Food Bank discourages HOPE Partners from recruiting volunteers from among HOPE clients. The Food Bank adheres strictly to the Tax Reform Act of 1976's guidelines, which state that donated product may not be sold or used in exchange for money, other property, or services. A volunteer who also receives food at a HOPE distribution may mistakenly believe that the food is payment for their work or may be wrongfully perceived by others as receiving food as payment for their volunteer time.

However, HOPE clients are welcome to volunteer for the HOPE Program of their own volition.

Any volunteers who will also receive HOPE food are required to wait until the end of the distribution to pick up their own HOPE food. Allowing volunteers to collect their food before other clients is preferential treatment that may be perceived as a reward for volunteering. If the HOPE Partner is concerned about the possibility of running out of HOPE product before volunteers are able to collect their food, please contact Distribution Programs to discuss increasing the size of the monthly order.

If the HOPE Partner engages volunteers who are also HOPE clients, it is the responsibility of the Primary Site Leader to:

- Inform clients that volunteering will not result in extra food or preferential treatment
- Inform the clients that they must wait until the end of the distribution to receive their HOPE bags and that they will be given the same amount of food as other seniors in the program
- Ensure the clients understand that waiting until the end of the distribution may result in receiving less food if supplies run out
- Ensure the client understands that volunteering is a personal choice and not a requirement to receive food
- Ensure the client completes intake and recertification as needed and signs in as everyone else does

d. Core Responsibilities

The HOPE Partner may divide these core responsibilities between the HOPE Partner Lead, Primary Site Leader, and Secondary Site Leader.

- Actively managing each HOPE distribution
- Ensuring an adequate number of personnel and/or volunteers (if applicable) staff at each HOPE distribution and ensuring that these individuals have been trained in and are compliant with the HOPE Policy and Procedures Manual
- Collecting, reporting, and storing HOPE distribution and client data
- Submitting monthly reports to the Food Bank within 7 calendar days of the HOPE distribution
- Maintaining regular communication with the Food Bank and notifying the Distribution Programs team immediately if the organization is considering potential changes to programming (e.g., changing the HOPE distribution day/time), has questions about HOPE, or requires assistance or clarification from the Food Bank in order to meet the expectations of HOPE Partner organizations

HOPE Partners also may be asked to support the Food Bank on other HOPE-related projects, such as collecting client feedback and co-hosting donor visits. The Food Bank commits to providing HOPE Partners ample notice before requesting their assistance with these tasks. In the event that the HOPE Partner needs to transition roles, the organization must inform the Food Bank of the change immediately (ideally prior to making the transition) and provide the Food Bank with the date of the transition and the updated name, title, and contact information of the HOPE Partner Lead, Primary Site Leader, and Secondary Site Leader. The new Primary Site Leader must attend a Food Bank's HOPE Partner Training prior to the next scheduled HOPE distribution.

3. Sourcing & Ordering HOPE Food

a. Sourcing HOPE Food

There are two main sources of HOPE food: the United States Department of Agriculture's (USDA's) commodities program and supplemental Food Bank food purchases. The USDA requires organizations participating in the commodities program to assess the eligibility of recipients based on their household income. For this reason, the Food Bank requires and trains HOPE Partners on proper use of the HOPE Intake Form. USDA also mandates that participating organizations do everything in their power to minimize barriers to accessing the program. The USDA commodities program provides a substantial source of food for HOPE, so it is critical that HOPE Partners work

with the Food Bank to adhere to and enforce the income eligibility requirements of the commodities program.

The quantities and varieties of foods available through USDA vary from month-to-month. To ensure that HOPE clients receive a variety of 10-12 items (on average) each month, the Food Bank purchases supplemental food items for the HOPE bags. This money is typically used to fill the gaps on the staple items the Food Bank receives through USDA-TEFAP. For example, if the Food Bank will not receive any canned vegetables in a given month through TEFAP, the Food Bank may choose to order a truckload of canned vegetables. The Food Bank works with vendors to ensure the lowest prices, most nutritious options, and best variety possible. Direct purchasing provides the Food Bank with additional flexibility but is a more limited source of HOPE food because it is contingent on donor support.

The Food Bank's Food Sourcing Manager works with the Distribution Programs team to identify what products HOPE will need in the coming months and maintain a well-stocked, varied inventory. The Food Bank's operations department reclassifies a portion of its TEFAP and purchased foods for HOPE, meaning that those products are reserved for the HOPE program. This system does not offer as much variety as the Partner Agency ordering system, but it guarantees that HOPE always has food available.

b. Placing HOPE Orders

Each HOPE order is placed by a member of the Distribution Programs or Agency Relations team. The staff doing the ordering chooses from products available in that reserved HOPE inventory to build orders for each site every month.

Although inventory varies, the Food Bank tries to include at least the following in each order for a minimum of 11-12 items:

- Animal protein
- 2 vegetables
- 2 fruits
- Milk
- Grain (e.g. oatmeal, cereal)
- Rice
- Beans (dry or canned)
- Pasta
- Pasta/tomato sauce or diced tomatoes
- Peanut butter (every other month)

c. Feedback & Requests

The Food Bank welcomes the input of HOPE Partners, who know what’s happening on the ground. Please direct any feedback or requests to Distribution Programs or your Agency Relations relationship manager.

HOPE Partner Leads and Primary Site Leaders may request that the Food Bank:

- Increase or decrease the size of their overall order (based on anticipated turnout, storage capacity, and/or amount of leftovers)
- Decrease the amount of a specific item ordered (based on the amount of that item left over)
- Try to get certain items or types of items for HOPE (e.g. oatmeal, low-sodium products)

The staff member placing the order will do its best to honor the requests of the HOPE Partner. In general, the more notice provided by the HOPE Partner, the better chance the Food Bank has of fulfilling a request.

Any request for a given month must be received before the HOPE order is placed:

Delivery/Pick-up	Deadline for placing requests
Monday	Wednesday 10:00 a.m. (the previous week)
Tuesday	Thursday 10:00 a.m. (the previous week)
Wednesday	Friday 10:00 a.m. (the previous week)
Thursday	Monday 10:00 a.m.
Friday	Tuesday 10:00 a.m.

d. Pick-up & Delivery

i. Pick-up at CTFB

1. Pick-up procedures

- HOPE Partners must sign in prior to all order and shop-for pickups. All HOPE Partner representatives will need to be knowledgeable of the account name and account number. Food bank staff reserves the right to contact any HOPE Partner Leader, Primary Site Leader, or Secondary Site Leader to solicit permission on suspect representatives. HOPE Partners are required to sign out before leaving.
- HOPE Partners may back up their vehicle to an empty dock. Only one (2) vehicles may be backed up to the dock at a time.

- HOPE Partners must adhere to all instructions given by Food Bank warehouse staff and regional drivers and treat them with respect.
- HOPE Partners more than 20 minutes late without prior notification may be asked to reschedule the pick-up day and time at the discretion of Food Bank warehouse staff.
- After all food is loaded, the HOPE Partner representative should bring the signed copy of the invoice to the warehouse staff.
- HOPE Partners are responsible for loading orders. Only individuals loading the vehicle should be on the dock; all others should wait in the reception area.
- The HOPE Partner should provide a vehicle(s) large enough to transport orders.
- Food Bank personnel reserve the right to limit the amount of product leaving the Food Bank dock if the product load appears to exceed the safety limitations of the vehicle's capacity.
- HOPE Partners are responsible for ensuring orders are correct. It is recommended that each case or box be checked by an agency representative as it is loaded into the vehicle.
- The Food Bank schedules two pick-up appointments every 30 minutes, so it is important that each HOPE Partner loads its vehicle(s) in a timely manner

2. Warehouse regulations

- Sign in and out!
- Arrive no earlier than 20 minutes before your scheduled pick-up
- Only 3 people per HOPE Partner are allowed on the dock at one time
- Do not smoke or chew tobacco while in the building or on the dock
- No food or drink in the warehouse
- Electronic devices are prohibited
- Only individuals 18 or older are allowed in the warehouse
- Children under the age of twelve must remain in the reception area under adult supervision at all times. The Food Bank staff is not responsible for supervising children
- Use side ramp or stairs to get on dock (no jumping on/off)
- Do not operate warehouse equipment
- Be aware of special notices posted in and around the warehouse
- Notify the warehouse staff of any irregularities or potentially hazardous conditions (spills, etc.)

- Warehouse hours are subject to change at the discretion of the Food Bank
- Closed-toe shoes required (no sandals or flip flops allowed)

ii. Pick-Up at Regional Delivery Sites

HOPE Partners that pick up their food at a regional delivery site agree to arrive at the time agreed upon with the Food Bank and to follow the instructions of the Food Bank regional driver.

iii. Delivery

HOPE Partners that receive their food via delivery must ensure that the Primary Site Leader (or another staff member or experienced volunteer who has been trained by the Site Leader) will be onsite during the delivery window to meet the Food Bank driver, receive the delivery, and store the food according to safe food handling and storage guidelines ([see page 14](#)).

iv. Cancellations and Delays

The Food Bank does everything in its power to prevent delays or cancellations of HOPE distributions. However, occasionally it may need to delay or cancel the delivery or pick-up of HOPE food. Reasons for potential disruption to a HOPE Partner's delivery or pick-up day/time include but are not limited to the inclement weather, truck breakdowns, and the Food Bank's holiday schedule.

The Food Bank will inform HOPE Partners in advance if their pick-up or delivery date falls on an official Food Bank holiday and work with the organization to identify a potential alternative pick-up or delivery date. In the event that the Food Bank needs to consider delaying or canceling a HOPE Partner's pick-up or delivery, the Food Bank contacts the Site Leader in advance to alert him or her to this possibility and discuss the potential implications for the HOPE Partner's distribution. Although it is not always possible to do so, the Food Bank strives to give the Site Leader at least 24 hours' notice that it is considering a delay or cancellation. If the decision is made to cancel or delay, the Food Bank will contact the Site Leader immediately to notify him or her. The Site Leader is responsible for doing everything that he or she can to notify clients of the change. If the Food Bank and the HOPE Partner are able to reschedule the pick-up or delivery and this change will affect the distribution day and/or time, the Site Leader is responsible for communicating that change to clients and any other staff/volunteers that support the distribution using signage provided by the Food Bank.

In the event that the Food Bank needs to make the decision to cancel or delay a HOPE Partner's pick-up or delivery on short notice (e.g., if a truck breaks down on its way to the regional distribution site or an unexpected change in weather requires the Food Bank to suspend warehouse operations until further notice), the Food Bank will contact the Site Leader as soon as possible to notify him or

her of the change. The Food Bank will do everything that it can to attempt to reschedule the delivery or pick-up.

In the event that a HOPE Partner needs to cancel or delay its HOPE distribution, the Partner must notify the Distribution Programs team immediately.

v. Reporting problems

Please contact a member of the Distribution Programs or Agency Relations team ([see page 5](#)) in the event of any of the following circumstances:

- You are running late or your delivery is running late
- Items listed on your invoice are missing from your delivery
- Items are damaged
- You expect non-food items that do not arrive (e.g. wagons)
- You have special instructions for the driver or you would like to change the date, time, or location of your pick-up or delivery

4. Food Safety

All Food Bank food storage and handling regulations must be followed to ensure client safety. It is imperative that HOPE Partners take the appropriate steps to ensure product quality.

a. Dry storage facility requirements

- The outside of the facility is free of debris/contaminants.
- There are no holes or gaps in the pipe conduits, screens, floor, ceiling, or doors that would allow insects or rodents access to the food.
- Food must be stored in a Food Bank-approved facility. Food Bank food may never be stored at an alternate location temporarily without prior notice and approval.
- The food storage area should be locked when not supervised to prevent possible theft.
- Food items must be stored at least four inches from the floor and walls and two feet from the ceiling.
- The storage area must be kept clean and dry. The shelves should remain clean with no debris on the floor.
- Garbage cans must be covered and emptied frequently to prevent unwanted pests.

- Cleaning or toxic supplies must be stored lower than food items or in a separate storage area. If you store paper goods, diapers, and/or feminine hygiene products, these items should also be isolated from chemicals.
- No severely dented/rusted cans.
- Personal or volunteer food should be kept in a separate area to avoid confusion.
- Stacks of food products should be sufficiently low so that the product at the bottom will not burst or be crushed by the weight of the product above, cross-stacked, away from steam, heat, or moisture, and shrink-wrapped if stored at the top of a storage rack.
- The HOPE Partner should rotate, label, or take periodic inventory of the food items to ensure freshness. Remember, FIFO (First In First Out).

b. Damaged products

All products distributed through HOPE should be inspected by the Primary Site Leader or trained staff and/or volunteers.

Discard any products with missing labels. Clients must be able to read the information printed on labels, especially the nutrition facts and ingredients.

i. Cans

If a can exhibits ANY of the following characteristics, it should be thrown away:

- Pinched metal
- Metal touching metal
- Dents on the rim or seam
- Dents that would prevent stacking
- Bulging or puffiness
- Rust
- Missing or illegible labels

Small dents that do not disturb the rim or seam or prevent stacking are acceptable.

ii. Intact Seals

Seals must be intact on all products (e.g. peanut butter).

iii. Open Bags & Boxes

Any open bags must be discarded, no matter how small the tear or hole. If a boxed product with a bag inside (e.g. cereal) has an open box, the product is still safe if the bag is intact.

iv. Pest control

Food storage areas are particularly susceptible to rodent and insect infestation. A visual inspection of the HOPE Partner's facilities should be done at least monthly, with prevention and treatment recommended quarterly or as needed.

- If the HOPE Partner uses a professional pest control company, copies of service reports, including chemicals used, should be made available to the Food Bank representative during monitoring and records must be kept on-site for one year
- If the HOPE Partner performs self-pest control, copies of product and chemicals used should be made available to the Food Bank representative during monitoring and records must be kept on-site for one year
- The exterior perimeter of the storage location must be kept free of tall grass, untended shrubbery, or debris to reduce the possibility of harboring pests
- The Food Bank reserves the right to require a HOPE Partner to use a professional pest control service if deemed necessary during a monitoring visit

c. Temperature & Refrigeration

HOPE product should be stored in dry storage with a temperature range of 50° to 70°F.

According to TEFAP, refrigerating rice, grains, and pasta products from May to September is “preferred” but not required. Due to the limited refrigerated storage capacities in the HOPE Program, Food Bank does not require that HOPE Partners refrigerate any HOPE product.

However, HOPE Partners that are also Partner Agencies should note that they are required to refrigerate these non-HOPE pantry products. Please refer to the Partner Agency Policies & Procedures Manual for additional information.

If a HOPE Partner does choose to refrigerate rice, grains, and pasta received from HOPE, products that have been stored in refrigeration CANNOT be removed from refrigeration and put back into dry storage. After refrigeration these dry goods will be at higher risk of spoilage. Product that has already been refrigerated should remain in refrigeration until distribution.

According to the TEFAP handbook, “Although 36° to 45°F is an acceptable temperature range [for refrigeration], 36° to 40°F is presently considered the ideal temperature range.”

d. Transportation

HOPE Partners that transport HOPE product off-site must follow food safety guidelines throughout the process. These guidelines apply to picking up HOPE product from the Food Bank or a regional delivery site, transporting HOPE product to another HOPE Partner or Satellite Site, or delivering to HOPE clients' homes.

- Minimize the amount of time that food is left in non-temperature-controlled vehicles. The storage lives of most foods are cut in half by every increase of 18°F (10°C).
- Return all HOPE product to an approved storage space by the end of the day. HOPE product should never be left in a vehicle overnight.
- Ensure that food is protected from the elements and secure from possible theft.
- Do not place HOPE product on the ground at any time. It needs to stay elevated by at least 4 inches.
- Never leave HOPE product outside a client's door or on their porch.

5. Civil Rights

Partner agency staff and volunteers must not engage in discrimination against any person because of race, color, national origin, sex, age or disability.

a. Religious organizations

Federal civil rights laws address explicitly religious activities at religious organization TEFAP sites:

1. Organizations must not engage in explicitly religious activities as part of TEFAP, including overt religious content such as worship, religious instruction, or proselytization.
2. An explicitly religious activity at a site must be separated in time or location from TEFAP services.
3. Organizations must not require clients or applicants to participate in explicitly religious activities to receive TEFAP.

i. Explicitly Religious Activities

The following table provides examples to guide explicitly religious activities at TEFAP sites.

<i>It is acceptable to . . .</i>	<i>It is unacceptable to . . .</i>
Hang a cross on a wall at the TEFAP site.	Require participants to stand by a cross and recite a prayer prior to TEFAP distribution.
Place a menorah on a table at the site during the holiday season.	Refuse USDA Foods to participants who do not practice the Jewish faith.
Display faith-based pamphlets at the front or back of the site for interested people.	Insert faith-based pamphlets into TEFAP bags or boxes that will be distributed to participants.
Have a religious official, such as a pastor, assist with TEFAP distribution.	Require or encourage participants to have a religious conversation prior to TEFAP distribution.
Hold a prayer service on the second level of a church building while TEFAP distribution occurs on the lower level.	Hold a prayer service in the same room and at the same time as TEFAP distribution.
Invite participants or applicants to participate in a voluntary — and clearly separate — prayer before TEFAP distribution.	Lead participants in a prayer at the beginning of TEFAP distribution.

ii. Written Notice of Beneficiary Rights

Sites located at faith-based or religious organizations must protect applicants’ and clients’ rights regarding participation in religious activities. (Applicants and clients are referred to here as “clients.”)

Sites must display the TEFAP Written Notice of Beneficiary Rights near the “And Justice for All” poster to inform clients of the following information:

- The site must not discriminate against clients 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 clients to attend or participate in any explicitly religious activities. Clients’ 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 client 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 client has no objection, with the understanding that the site cannot guarantee that an alternate provider will be available in every instance.
- Applicants and clients may report violations of these protections (including denials of services or benefits) to TDA at www.Squaremeals.org.

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

iii. Beneficiary Referral Request

When an applicant or client 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 HOPE Partner 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 HOPE Partner must keep the Referral Request onsite for 3 years. Upon request, referral records must be made available to TDA, CEs, and sub-distributing 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.

b. 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.)

c. Civil Rights Complaint Log

HOPE Partners should keep a Complaint Log of any incident that resulted in a client not receiving food, whether the client reported the incident to HOPE Partner staff or staff observed the incident themselves. (Sites may use a spiral notebook to record incidents, including the date, the client’s name, and a description of the incident.) The Site Leader should also call the Distribution Programs Manager or the Agency Relations Manager about the incident in order to develop a plan for preventing similar incidents in the future.

d. Civil Rights poster

The Food Bank requires all partner agencies to post the provided “And Justice for All” poster in an unobstructed location visible to clients. All older versions of this poster must be removed. The current poster is green.

e. TEFAP Participant Rights & Responsibilities form

TEFAP applicants and clients have rights and responsibilities that are listed in the TEFAP Participant Rights and Responsibilities form. HOPE Partners must make the form available during the application and recertification process. HOPE Partners may read the form to applicants if necessary, or applicants may read it themselves.

For example: Some sites present a laminated copy of the TEFAP Participant Rights and Responsibilities form to each applicant as part of the application process.

f. USDA Nondiscrimination Statement

This statement must be placed in a prominent location for clients to see and further explained to the client. The Food Bank intake form includes this statement, however if your agency uses a unique intake form, this statement must be printed on the form or placed where the client can see it. The nondiscrimination statement does not need to be read in its entirety; “This institution is an equal opportunity provider” is sufficient to meet the nondiscrimination requirement.

“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, 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, **3. Email:** program.intake@usda.gov.

g. Training

The HOPE Partner is responsible for training all staff and volunteers who work with the HOPE Program.

Some of this training is informal—for example, a Primary Site Leader should ensure that volunteers know how to operate the program and use safe food handling practices, but that training does not have to be documented. However, other trainings must be taken regularly and formally documented.

i. HOPE Partner Training

The HOPE Partner must complete HOPE Partner Training before their first HOPE distribution. Training includes but is not limited to the following topics: background on the Food Bank and HOPE, HOPE program guidelines, responsibilities of HOPE Partners and the Food Bank, safe food handling training, and civil rights training.

The Food Bank requires the Primary Site Leader to attend this training. Other staff and volunteers who will support the organization's HOPE distributions are strongly encouraged to attend this training; however, the Food Bank understands that this is not always possible. The Primary Site Leader is responsible for training any individuals who will be involved in HOPE distributions but are unable to attend the HOPE Training. The Primary Site Leader should use the HOPE Training Log provided by the Food Bank to document these trainings ([see Resource Center](#)).

HOPE Partners are required to attend a HOPE Partner Training once annually. This gathering provides an opportunity for HOPE Partners to celebrate the service they provide to their communities, meet and learn from each other, and receive important updates from Food Bank staff.

If the HOPE Partner changes its leadership, contact the Distribution Programs or Agency Relations team to arrange training by the Food Bank. Having an outgoing Primary Site Leader train an incoming Primary Site Leader is not sufficient.

ii. Food Handler Training

Visit the Food Bank's online "Resource Center" for links to ServSafe's Food Handler Certificate Course (\$7, good for 2 years) and Food Safety Manager Exam (\$35, good for 5 years). Each course takes about 2 hours to complete.

At least one representative at every HOPE site (usually the Primary Site Leader) must maintain current food handler certification from an accredited program. ServSafe's Food Handler Course costs \$7 and is good for 2 years, while the Food Safety Manager Course costs \$35 and is good for 5 years. Each course takes about 2 hours to complete.

HOPE Partners should provide a print or digital copy of every food handler certification to the Food Bank and keep another on file at their site. The easiest way to provide the Food Bank with a copy is to forward the confirmation email with an attached certificate.

iii. Civil Rights Training

All staff and volunteer are required to complete and document some form of civil rights training. For those who do not interact regularly with clients or handle client information, the Limited Civil Rights Training is sufficient. (The Limited Civil Rights Training is available in English and Spanish in the [Resource Center](#).) A Primary Site Leader may read the training to a group or ask individuals to read it to themselves, and then each person should record their training in a Limited Civil Rights Training log ([see Resource Center](#)).

Anyone who interacts regularly with clients and/or handles client information is required to complete the full Texas Department of Agriculture Civil Rights Training. This civil rights certification is good for one year and must be retaken every year.

If the Texas Department of Agriculture Civil Rights Training is completed as group, the group should go through the online course together, and then each person should record their training in a full TDA Civil Rights Training log. If the TDA Civil Rights Training is completed as an individual, the person will receive a confirmation email with a certificate. This email should be forwarded to the Distribution Programs Manager, and the HOPE Partner should save a print or digital copy of each person's certificate.

iv. Summary of Training Requirements

Type of Training	Who needs to take it?	How is it accessed?	Does it need to be documented? If so, how?
HOPE Partner Training	Primary Site Leader, at a minimum	Contact the Distribution Programs team to arrange training by the Food Bank. Having an outgoing Primary Site Leader train an incoming Primary Site Leader is not sufficient.	Yes. Everyone must sign a training log, available for download from the Food Bank’s online “Resource Center.” The HOPE Partner must store these training logs for 3 years.
Food Handler Training	At least one HOPE Partner representative, ideally the Primary Site Leader	Visit the Food Bank’s online “Resource Center” for links to ServSafe’s Food Handler Course (\$7, good for 2 years) and Food Safety Manager Course (\$35, good for 5 years). Each course takes about 2 hours to complete.	Yes. HOPE Partners should provide a print or digital copy of the certification to the Food Bank and keep another on file at their site. The easiest way to provide a copy is to forward the confirmation email sent by Learn2Serve.com.
Operating HOPE	All staff and volunteers	HOPE Partner leadership must informally or formally train everyone in the basic HOPE operations and food safety regulations needed to run HOPE successfully and in compliance.	No
Full Civil Rights Training	Anyone who interacts regularly with HOPE clients and/or handles client information (including all intake workers)	Visit the Food Bank’s online “Resource Center” for links to the TDA’s Civil Rights Training in English and Spanish. Civil rights certification is free and is good for 1 year. The course takes about 30 minutes to complete.	Yes. HOPE Partners should keep a digital or print copy of everyone’s certification on file at their site and provide a copy of site leadership’s certificates to the Food Bank. The easiest way to provide the Food bank with a copy is to forward the confirmation email sent by the TDA.
Limited Civil Rights Training	All HOPE staff and volunteers not taking the full Civil Rights Training	The training document in English and Spanish is available for download from the Food Bank’s online “Resource Center.” HOPE Partners should keep a copy on site. Someone can read the document aloud to a group, or individuals can read it to themselves.	Yes. Everyone must sign a training log, available for download from the Food Bank’s online “Resource Center.” The HOPE Partner must store these training logs for 3 years.

6. Intake & Recertification

a. Application Process

Although one person can enroll on behalf of their whole household for Mobile Pantry and Partner Agency distributions, at HOPE distributions each person must enroll individually to receive assistance. Each person must sign their own intake form or record.

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
- Age (date of birth is listed on the form but not required; clients must disclose age to prove that they are 55 or older)
- The basis for eligibility

Clients who are homeless or transient do not need to provide an address.

i. Self-Reporting and Requesting Proof

HOPE applicants and clients self-report their name, address, number of people in household, age, and basis for eligibility. HOPE Partners may request but not require any applicant or client to provide proof of identification, residency, or income.

HOPE Partners must clarify the following points to applicants and clients:

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

HOPE 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. HOPE Partners 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 HOPE Partner requests additional data. The collection of additional data must not be a real or perceived barrier to participation in USDA TEFAP.

ii. Households

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.

iii. Citizenship

There are no citizenship requirements. HOPE Partners must not request nor require any applicant or client to prove citizenship through any means whatsoever.

iv. Residency

The Food Bank's only residency requirement is that an individual applying for HOPE must live within the Food Bank's 21-county service area:

- Bastrop
- Bell
- Blanco
- Burnet
- Caldwell
- Coryell
- Falls
- Fayette
- Gillespie
- Hays
- Freestone
- Lampasas
- Lee
- Limestone
- Llano
- McLennan
- Milam
- Mills
- San Saba
- Travis
- Williamson

However, there is no specific length of time that they have to have lived in the service area.

Although the Food Bank encourages HOPE Partners to keep HOPE as unrestrictive and available as possible, HOPE Partners may impose their own residency restrictions if they wish.

HOPE Partners may ask but not require any applicant or client to provide proof of residency. If someone cannot or will not provide proof of residency but otherwise qualifies for HOPE, the HOPE Partner must provide them with HOPE.

If a client does not live in the HOPE Partner's service area, the client must be referred to a different site in their service area ([see Find Food Now tool](#)). If the HOPE Partner is a Partner Agency, the Food Bank suggests providing emergency food assistance to individuals before referring them elsewhere.

b. Determining Eligibility for HOPE

There are three ways in which an individual age 55 or older can qualify for HOPE. 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). These qualifying reasons are detailed on the handout HOPE Eligibility Guidelines, formatted for client distribution ([see Resource Center](#)).

i. Federal Benefits (Categorical Eligibility)

An individual is automatically (or categorically) eligible for HOPE if someone in their household 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 an individual is categorically eligible, they do not have to disclose their income.

ii. Income

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.

iii. Household crisis

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 HOPE 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. In general, ALL clients who are age 55 or older should receive USDA TEFAP food unless they do not wish to declare they are in emergency need for food.

c. Certifying the Intake Form

Intake records must indicate the beginning month/year and ending month/year of the client's certification period. Even if a HOPE Partner expects to recertify a client during a mass recertification that will occur before the client's certification expires, the intake worker should list the expiration date as 12 months from the current date (or 6 months for emergency food need certifications).

For example, if a client signs up for HOPE on October 10, 2019 and the HOPE Partner expects to do recertification with everyone on January 15, 2020 the intake worker should still list October 10, 2020 as the expiration date.

Intake workers must sign and date the record to certify it.

d. Proxies (formerly "Authorized Representatives")

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

One proxy cannot pick up more than 3 HOPE packages or recertify for more than 3 HOPE clients in a given month, including him- or herself. For example, if Mr. Jones is picking up HOPE for himself, he can act as proxy and pick up HOPE for only two other people that month. If Ms. Smith is not picking up HOPE for herself, she can act as proxy and pick up HOPE for three people that month.

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. 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.

Every time they pick up food or complete recertification for a client, the proxy must present identification 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 their behalf to verify that the client received food.

e. 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.

HOPE Partners can either track certification expiration dates for each client, which ensures the client will not have to recertify any more often than necessary, or conduct “mass recertification” to catch many people at once. Many HOPE Partners conduct mass recertification in January of each year, ask clients at subsequent distributions whether they picked up HOPE in January, and recertify them if they did not. Either system is fine as long as no client receives HOPE product with an expired USDA certification.

f. Written Procedure

The HOPE Partner must maintain a written procedure for the application process. The written procedure must include providing the Written Notice of Beneficiary Rights to applicants. The procedures must be available for monitor and compliance reviews at all levels of distribution.

The Central Texas Food Bank has provided this procedure for all HOPE Partners ([see Resource Center](#)).

7. Distributing HOPE

a. Distribution Requirements

i. Consistency of HOPE Distribution Schedule

HOPE Partners work with the Food Bank to select a recurring HOPE distribution day and time (e.g., the 3rd Thursday of every month, 10 a.m.-12 p.m.). HOPE Partners should offer their HOPE

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distribution on the day and during the hours specified. If there is leftover food at the end of a monthly distribution, HOPE Partners must save it for the following month.

If HOPE Partners find that clients have a difficult time attending a single distribution, HOPE Partners may adopt an alternate distribution model in which clients are able to pick-up their HOPE products at any point throughout the month. HOPE Partners that adopt this distribution method must take extra care in record keeping and reporting. HOPE Partners must obtain approval from Food Bank staff to use this distribution model.

HOPE Partners must notify the Food Bank of any potential scheduling adjustments at least one week prior to their HOPE pick-up or delivery date. Potential adjustments that the Food Bank must be notified of include changes to pick-up/delivery date and time; HOPE distribution date and time; the organization's operating hours, address, and facilities (e.g., construction that might restrict client access); and HOPE Partner Lead and Primary Site Leader contact information. HOPE distribution dates and times are public information and therefore must always follow the distribution schedule approved by Food Bank staff.

The Food Bank will do its best to accommodate requests to change the day or time of HOPE Partners' delivery/pick-up or distribution; however, it cannot guarantee its ability to do so. The more notice the HOPE Partner can provide to the Food Bank, the more likely that the Food Bank will be able to accommodate the change.

ii. Public Notice, Publicity, & Outreach

Because HOPE uses USDA foods, HOPE Partners must give notice to the public of distributions. Public notices must meet the following requirements:

- Target eligible households whose members are unemployed or have low incomes and households that include elderly or disabled people
- Include the locations of HOPE sites
- Provide the days and hours of HOPE distributions

If applicable, HOPE Partners post a public notice to explain why a distribution is canceled.

TDA encourages HOPE Partners to inform the public of all USDA Foods distributions through their own established and customary communication methods. Suggested methods to advertise the availability of USDA Foods include, but are not limited to, the following:

- The media (TV, radio, and newspaper)
- Civic and religious organizations
- City and county governments

- Social service organizations, upon request

The HOPE Partner's hours of operation will also be made public on the Food Bank website and through 2-1-1.

iii. Distribution Space

TEFAP distributions must be open to the 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.

HOPE 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.

iv. Donated Products

- HOPE Partners are prohibited by federal law from selling Food Bank items and donated food
- HOPE Partners may not use Food Bank food in fundraising activities (i.e. bake sales, walk-a-thons, concessions, etc.), and food obtained from the Food Bank may not be bartered, traded or exchanged for any other item(s) or service(s)
- HOPE Partners may not accept donations from clients
- HOPE Partners may not sell or use donated product in exchange for money, property, or services.

b. Turning people away

The HOPE Program is restricted to seniors age 55 or older who meet the TEFAP eligibility guidelines ([see Resource Center](#)). Due to the provision for emergency food need, any person at least 55 years old in need of food assistance is eligible for HOPE.

HOPE Partners are not permitted to distribute HOPE product to ineligible people, including anyone under age 55. If someone ineligible asks to receive HOPE product, please refer them to

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other food assistance resources in your area ([see Find Food Now tool](#)). If the HOPE Partner is also a Partner Agency, the Food Bank encourages them to offer non-HOPE food to the ineligible person and record the visit as a Partner Agency pantry visit, not a HOPE visit.

c. Pre-Bagging vs. Client Choice

HOPE Partners may choose to pre-bag HOPE or have clients choose which products they want.

Pre-bagging HOPE enables HOPE Partners to distribute food more quickly to clients and can make it easier for clients to transport the food from the distribution site to their homes. However, the labor and materials required for pre-bagging can be costly. Also, with pre-bagging clients may end up with too much food, items they do not like, and/or items they cannot eat due to dietary restrictions. Sending clients home with unwanted items wastes food and places a burden on the client.

For HOPE Partners that pre-bag, the Food Bank recommends establishing a system by which clients can return unwanted goods. For example, Giddings Food Pantry keeps distribution efficient in their limited space by giving every client a preselected cart, but there is a table by the exit where clients can leave unwanted items for redistribution.

Client choice models are generally easier to set up but also take much longer to distribute. They give HOPE Partners a better idea of which items suit their clients, reduce food waste, and offer clients a more tailored experience. However, due to the time spent on distribution, client choice models can also leave clients waiting in line much longer.

d. Leftover HOPE Product

Any surplus food is to be stored in a secure place and used at the following month's HOPE distribution. The Food Bank orders food for each HOPE Partner based on the number of seniors it reports serving in the prior month.

It is the Food Bank's goal to minimize leftover HOPE food by supporting HOPE Partners in the timely and accurate submission of monthly reports and communicating regularly about potential changes in the number of seniors served.

HOPE product cannot be added into general inventory for Partner Agencies or any other program. HOPE has to be kept separate and should be labeled accordingly.

8. Reporting

HOPE Partners are required to submit monthly reports stating the number of new clients, pre-seniors (55-64), seniors (65+), proxy pick-ups, and veterans served in HOPE each month. In turn,

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the Food Bank provides cumulative information to the Texas Department of Agriculture, which reports consolidated statewide numbers to the United States Department of Agriculture and Feeding America.

a. How to submit a report

HOPE reports should be submitted via the HOPE Program Monthly Report form on the Food Bank's website. It is available under **Agencies > Reporting > HOPE Partner Reporting** and at <https://www.centraltexasfoodbank.org/page/hope-program-monthly-report>. Within a few minutes of submitting your report, you should receive an email confirmation. We recommend that you save a copy of this confirmation for your own records in case of a technical problem with the online reporting system. Please contact Partner Services if you do not receive a confirmation email after submitting your report.

HOPE Partners using Link2Feed do not need to submit a report. However, they are responsible for ensuring that their data are complete and accurate by the deadline.

b. Deadlines

Each HOPE Partner is required to submit an online monthly report or complete their Link2Feed data entry no later than 7 days after its scheduled HOPE distribution. Due to the CTFB's external reporting deadlines, sites that distribute through the end of the month must submit their online monthly report or complete their Link2Feed data entry no later than the 5th of the following month.

c. Corrections

Reporting is considered "late" if the CTFB does not have a complete, accurate report or Link2Feed data by the end of the deadline day. Please bear in mind that if a report is originally submitted before the deadline but is then found to contain errors, these errors must be corrected before the deadline for the report to be considered on time. Likewise, if a site using Link2Feed adds or edits Link2Feed records for the month after their reporting deadline, their reporting will be considered late.

d. Late Report Policy

The Programs Team at the Food Bank has a department-wide Late Report Policy. A late monthly report will result in a hold, which denotes a pause in program activity at the partner site for an established period of time based on the number of holds the HOPE Partner has generated during the calendar year.

Please note that for the first three holds, in order to receive a pick-up or delivery on the normally scheduled date, a HOPE Partner must submit their late report before the Food Bank's internal

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ordering deadlines ([see page 11](#)). If a late report for the previous month is submitted after this ordering deadline has passed, the HOPE Partner will not be able to receive their pick-up or delivery as normally scheduled.

For an explanation of the consequences of successive holds (first hold of the calendar year, second hold of the calendar year, etc.), please see page ([see page 36](#)).

Any HOPE Partner that is experiencing difficulties meeting their reporting deadlines should contact the Food Bank immediately to discuss potential solutions. If you are aware that you will be late in submitting your monthly report, please communicate with Partner Services as soon as possible.

9. Administration

a. Program Guidelines

HOPE Partners are required to abide by the Program Guidelines. The HOPE Partner is responsible for ensuring that any additional staff and/or volunteers who support his or her organization's HOPE distribution understand and abide by these guidelines.

The Food Bank reserves the right to change the Program Guidelines for HOPE Partners at any time and without advance notice. However, the Food Bank will strive to provide HOPE Partners with notice prior to changing any of the Program Guidelines. As necessary, HOPE Partners will be provided with additional training to support their compliance with new guidelines.

b. Client feedback

The Food Bank greatly values client feedback on HOPE. In order to ensure ongoing program improvement, The Food Bank conducts a HOPE Client Feedback Survey biannually, typically during the summer or early fall. HOPE Partner participation in survey implementation is critical to the success of this effort. Food Bank staff will work with HOPE Partners to implement the annual survey and will share aggregate survey data after all completed surveys have been collected and analyzed.

c. On-site documents for clients

- i. TEFAP Participant Rights & Responsibilities** ([see Resource Center](#))
- ii. And Justice for All** (can be requested from the CTFB)
- iii. HOPE Eligibility Guidelines** ([see Resource Center](#))

Please remember that the Federal Poverty Guidelines expire every year on June 30, so make sure you are using and distributing the latest Eligibility Guidelines.

- iv. **Written Notice of Beneficiary Rights** ([see Resource Center](#))
- v. **Beneficiary Referral Request** ([see Resource Center](#))

d. On-site Documents for Recordkeeping

The HOPE Partner is required to keep the following records for three years and to make them available to Feeding America, USDA, and TDA staff when requested.

i. Complaint Log

A complaint log is a binder or notebook (or section of one) that is designated for recording any civil rights incidents that occur. When an incident occurs, record the date and time, the names and roles of the parties involved, a description of the incident, and any follow-up actions taken. Partner Agencies with HOPE are welcome to have just one complaint log for their pantry, but if the incident was specifically related to HOPE (e.g. happened during a HOPE distribution), indicate that as well.

ii. Order invoices

Yellow order invoices come with every HOPE pick-up or delivery and list all the products included in the order. If your actual inventory does not match your order invoice, please make sure the driver's copy reflects the disparity and contact Distribution Programs or Agency Relations immediately.

iii. Pest control records

If a professional comes in to conduct pest control, save the records of the services performed. If you do your own pest control, keep a log noting dates, areas covered, and products used. Keep pest control records for at least 1 year.

iv. Written procedure ([see Resource Center](#))

v. Non-Profit 501(C)(3) and Low-Income Housing Provider Status

All agencies receiving donated products from the Food Bank must be federally exempt 501(c)(3) organizations, be affiliated with a 501(c)(3), or be a 501(c)(3) equivalent (churches). See IRS Publication 557 for an explanation of the different 501(c) statuses. The agency must adhere to all requirements under IRS Code 170(e)(3). All HOPE Partners must show clear, complete, and current documentation of their agency's exemption under Section 501(c)(3) exemption of the Code or Church status. The following are examples of complete information:

- Current IRS determination letter where the address matches the address of the organization listed on the Agency agreement, or

- Current group exemption letter with a listing of the local agency in the group exemption directory, a list of active local sites from the national/regional headquarters website, or a letter from the group exemption’s headquarters or regional office attesting that the local organization is covered under their group exemption, or
- Current listing of the organization on IRS website section under Exempt Organizations Selection Check (Publication 78 data) indicating they are a Public Charity (“PC”); or
- Faith Based Organization Eligibility Form that includes documentation of the organization’s ability to meet at least nine (9) of the fourteen (14) possible criteria established by the IRS to be considered a Church (i.e. “14-point criteria”), along with a letter from the faith based organization stating they have never been denied or revoked 501(c)(3) status and their program will serve the “ill, needy, infants”; or
- A letter from the CEO or Board Chair of a qualified agency indicating that it is the Agency sponsoring such program and assuming all responsibilities (fiscal and legal) for the sponsored organization. The Member will need both the sponsorship letter as well as clear, complete and current evidence of the sponsoring organization’s exemption or Church status following criteria listed above

vi. Board of directors

All HOPE Partners must have a current list of directors, board members, or the equivalent that contains contact information for those listed. HOPE Partners should keep a digital or print copy on file and provide a copy for the Food Bank.

vii. TEFAP agreement

The Emergency Food Assistance Program created this agreement to bound both contracting entity (Food Bank) and site (HOPE Partner) to its terms and conditions.

viii. HOPE Letter of Agreement

HOPE Partners must complete a HOPE Letter of Agreement (LOA) prior to the start of each Fiscal Year. The LOA serves as a contract between the Food Bank and HOPE Partners, and outlines major roles and responsibilities of each party. By signing this agreement, HOPE Partners attest that they understand and commit to following the Program Guidelines for HOPE Partners.

The HOPE Letter of Agreement is renewable annually, and the renewal process will be initiated by the Food Bank.

ix. Training Certifications and Logs

The HOPE Partner must keep copies of all civil rights and food handler certifications and all training logs.

x. Intake forms

All current intake records for a client should be kept together, including HOPE Intake Forms and any supplemental written notes giving permission to a proxy.

xi. Sign-in sheets

All sign-in sheets for a given month should be kept together.

e. Grievances

Grievances against HOPE Partners

- The Food Bank Programs Department must respond to all public HOPE Partner complaints
- The Programs Department may notify the HOPE Partner and/or board of directors about the complaint, and if action is required, will initiate investigation protocols
- The Programs Department reserves the right to visit any HOPE Partner unannounced to investigate complaints made by the public
- Investigation results will be documented in the HOPE Partner's file, and the HOPE Partner will be notified in writing if any action needs to be taken

Grievances against the Food Bank

- HOPE Partners may submit a written grievance statement to Chief Program Officer Emily DeMaria. The statement must include the reasons for the grievance, pertinent facts, and what the HOPE Partner believes would be an acceptable solution to the problem
- The Chief Program Officer will develop a plan of action in writing within seven working days of receiving the grievance notice
- The HOPE Partner may appeal this decision to the Food Bank CEO within ten working days. The decision on appeal will be given to the HOPE Partner in writing within seven working days of receiving the appeal. The Food Bank CEO's decision is final
- A HOPE Partner will not be discriminated against or suffer any reprisals by the Food Bank as a result of filing a grievance

f. Holds, suspension, termination, & appeal processes

If HOPE Partner violates Food Bank policies and procedures, there are three possible actions: Account Hold, Suspension, or Termination.

Hold

HOPE Partners may be placed on a “hold” status for the following reasons:

- **Document Hold** – HOPE Partner has been prompted to submit documentation (training certificates, board of directors list, 501(c)(3) / IRS documents, etc.) and is not responding to or communicating with the HOPE team in a timely manner.
- **Monitor Hold** – HOPE Partner is due for annual monitor and is not responding to or communicating with the HOPE Partner team in a timely manner.
- **USDA Hold** – HOPE Partner has violated USDA policies and must implement a corrective action plan.
- **Report Hold** – HOPE Partners must submit their complete, accurate monthly report no later than 7 calendar days after their scheduled HOPE distribution ([see page 31](#)).

Any HOPE Partner that receives more than three “holds” within a calendar year from failure to submit their monthly report on time will face an automatic one-month suspension. Recurring tardiness in reporting over the course of a calendar year may result in the termination of partnership between the Food Bank and the HOPE Partner.

- **HOLD 1:** HOPE Partner will be placed on hold and will not receive any HOPE product until their report is turned in.
- **HOLD 2:** HOPE Partner will be placed on hold and will not receive any HOPE product until their report is turned in.
- **HOLD 3:** HOPE Partner will be placed on hold and will not receive any HOPE product until their report is turned in.
- **HOLD 4:** HOPE Partner will be placed on a one month suspension and will not be allowed to pick-up or receive a delivery of HOPE product for one month.
- **HOLD 5:** HOPE Partner will be placed on a one month suspension and will not be allowed to pick-up or receive a delivery of HOPE product for one month.
- **HOLD 6:** Termination of HOPE Partnership between the Food Bank and the HOPE Partner.

g. Suspension

The purpose of a suspension is to discontinue a HOPE Partner’s Food Bank use for a specific amount of time due to a major violation. A suspended partner loses all the rights and privileges of a HOPE Partner as well as its status as such.

- A HOPE Partner may be suspended without first being placed on Hold for serious violations
- A suspension shall not last more than six months
- The suspension and corrective action plan must be communicated in writing to the HOPE Partner
- A suspended HOPE Partner may regain its partner agency status if the Distribution Programs Manager approves and if the agency has completed its corrective action plan

Example of a suspension violation: Moving HOPE resources to a new location without previous approval

h. Termination

Termination

The purpose of termination is to discontinue a HOPE Partner's access to the Food Bank after a violation. Termination means that a partner loses all rights and privileges of a HOPE Partner as well as its status as such.

- ***A HOPE Partner may be terminated without having first been put on hold or suspension for serious violations***
- The termination notification must be communicated in writing to the HOPE Partner
- A terminated HOPE Partner may reapply to become a Food Bank HOPE Partner no sooner than one year after termination
- Example of a termination violation: HOPE Partner selling food that it has received from the Food Bank

i. Appeals Process

A HOPE Partner may not appeal a hold, but a HOPE Partner may appeal the Food Bank's decision to suspend or terminate HOPE activity at their site by following the appeals process listed below.

- A HOPE Partner must submit a written appeal either by mail or email within ten working days of their notice of suspension/termination. If the appeal is not received within 10 working days, an appeal hearing will be denied.

MAIL: Tanya Greenough
 Distributions Program Manager
 Central Texas Food Bank
 6500 Metropolis Dr. Austin, TX 78744

HOPE Program
 Guidelines

EMAIL: tgreenough@centraltexasfoodbank.org

- An appeal hearing with Central Texas Food Bank's Chief Program Officer, Agency Services Director and Distribution Programs Manager will convene to address the appeal. The Food Bank HOPE Program privileges may be suspended pending the decision of the hearing.
- A notification of the appeal decision will be sent to the HOPE Partner within seven working days by mail.
- If a HOPE Partner is reactivated as a HOPE Program site, they will be placed on a 90 day evaluation period. At the end of the 90 days the partnership will be assessed by the Distribution Program Manager, Agency Services Director and the Chief Program Officer to ensure that all minimum requirements are being met. If the partner has failed to meet these standards the program at the site will be terminated with no appeals process.

10. Appendices

a. Resources for Client Referrals

It is a best practice to refer clients to additional resources when possible. Here are a few places where clients can find additional resources.

- By calling 211
- By being directed to Find Food Now on our website at centraltexasfoodbank.org