OKLAHOMA
Human Services



Annual Civil Rights Training and Back-to-Basics CSFP/TEFAP Training for Local Partners

Updated August 2026

Oklahoma Human Services (OKDHS)
Food Distribution Unit

OKLAHOMA
Human Services

What is TEFAP?

- The Emergency Food Assistance Program helps supplement the diets of low-income Americans by providing them with emergency food and nutrition assistance at no cost through food pantries and soup kitchens.
- The United States Department of Agriculture (USDA) makes food commodities available to the States, which receive the food and supervise overall distribution of the food commodities to eligible recipient agencies.
- Eligible recipient agencies are public or private nonprofit organizations that provide food and nutrition assistance to the needy through the distribution of food for home use or the preparation of meals.

What is CSFP?

- The Commodity Supplemental Food Program works to improve the health of elderly people at least 60 years of age by supplementing their diets with nutritious USDA foods.
- Under CSFP, USDA purchases food and makes it available to the States, along with funds for administrative costs.
- The States then store the food and distribute it to public and non-profit private local agencies. The States may also contract with Distributing Agencies (Food Banks) to store and distribute the CSFP food packages.

What is Discrimination?

The act of distinguishing one person or group of persons from others, either intentionally, by neglect, or by the effect of actions or lack of actions based on their protected classes.

What are Civil Rights?

Civil Rights are the non-political rights of a citizen; the rights of personal liberty guaranteed to U.S. citizens by the 13th and 14th Amendments to the U.S. Constitution and by acts of Congress.

What is a Protected Class?

- Any person or group of people who have characteristics for which discrimination is prohibited based on a law, regulation, or executive order.

- The Protected Classes in TEFAP & CSFP are:
  - Race
  - Color
  - National Origin
  - Religion
  - Sex
  - Disability
  - Age
  - Marital Status
  - Family/Parental Status
  - Income Derived from a Public Assistance Program
  - Political Beliefs
  - Reprisal or Retaliation for Prior Civil Rights Activities

Civil Rights Legislation

- ❖ All programs receiving Federal funding must comply with Civil Rights
- Title VI of the Civil Rights Act of 1964
- The Age Discrimination Act of 1975
- Title IX of the Education Amendments of 1972
- USDA Regulation 7 CFR Part 16, Equal Opportunity for Religious Organizations
- Section 504 of the Rehabilitation Act of 1973
- And other pertinent civil rights and nondiscrimination laws and regulations

Civil Rights Legislation

- **<u>Title VI-Civil Rights Act of 1964</u>** states:

No person in the United States shall be discriminated against on the grounds of race, color; or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity.

- Example: Race/color: Treating or speaking to a child differently (using slang terms for example) or in a friendlier manner because of race or color.

Civil Rights Legislation

- **<u>The Age Discrimination Act of 1975</u> states:**

No person in the United States, shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.

Civil Rights Legislation

- **Title IX of the Education Amendments of 1972** states:

No person in the United States shall, on the basis of sex, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance.

- Example: A meal site should not offer smaller portions to women compared to men. The same size portion should be offered to each, regardless of sex.

Civil Rights Legislation

- **<u>USDA Regulation 7 CFR Part 16, Equal Opportunity for Religious Organizations</u>**:

The purpose of this part is to set forth USDA policy regarding equal opportunity for religious organizations to participate in USDA assistance programs for which other private organizations are eligible.

Civil Rights Legislation

- **Section 504 of the Rehabilitation Act of 1973**

- Title II and Title III of the **Americans with Disabilities Act** of 1990 extended the requirements to all services, programs and activities of State and local governments and prohibits discrimination based on disability in other public services.

Civil Rights Legislation

- And other pertinent civil rights and nondiscrimination laws and regulations

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[1] "Laws may include but are not limited to: Title VI of the Civil rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, American with Disabilities Act of 2008, Age Discrimination Act of 1975, Civil Rights Restoration Act of 1987 (per USDA Memo CRD 01-2026)."
[2] "Regulations may include but are not limited to: 7 CFR 15, 7 CFR 16, 28 CFR 35, 28 CFR 36, 28 CFR 42, USDA Departmental Regulations, FNS Program Regulations (per USDA Memo CRD 01-2026)."

Goals of Civil Rights Legislation

- Equal and consistent treatment for all eligible applicants and participants
- Knowledge of rights and responsibilities
- Elimination of illegal barriers that prevent or deter people from receiving food
- Dignity and respect for all

9 Required Civil Rights Training Areas:

1) Collection and Use of Racial/Ethnic Data
2) Effective Public Notification Systems
3) Complaint Procedures
4) Compliance Review Techniques
5) Resolution of Noncompliance
6) Requirements for Reasonable Accommodations of Persons with Disabilities
7) Requirements for Language Assistance
8) Conflict Resolution
9) Customer Service

Training Expectations

- Recipient agencies are responsible for training **annually**
- Front line workers (including volunteers), workers determining eligibility for TEFAP or CSFP, and all levels of supervisors must receive full Civil Rights training (this PowerPoint)
- Recipient agencies are required to document the training and maintain documentation for three years *plus* the current fiscal year
- Volunteers who *infrequently* interact with program participants must receive, at a minimum, limited Civil Rights training
- Volunteers who *do not* interact with program applicants and participants, who *do not* determine eligibility for CSFP/TEFAP, and who *do not* handle personal information, are not required to receive annual Civil Rights training

Training Expectations, Continued

At the end of the Civil Rights training, staff and volunteers should:

- Be able to identify a Civil Rights complaint, if received
- Know what steps to take if they receive a complaint
- Understand that it is a basic right of an individual to file a complaint

Required Documentation of Civil Rights Training

- Name of the participant and date of the training on a Certificate of Training (aka training attendance sheet)
- Keep your Certificates of Training for 3 years, plus the current year
- If the training is provided by a designated trainer, please include name of training instructor
- Names of all the participants attending the training
  - Use a simple sign-in sheet for all participants to sign at the END of training

Civil Rights Training Tips

- Be sensitive, Civil Rights can be a personal topic, and people approach it from different angles
- Cover the basics
- Expect issues and questions and be prepared to address them
- Answer questions directly and clearly
- Recognize and value differences
- If you are unsure of the answer, DO NOT make something up - agree to get the answer and then follow up
- Contact OKDHS/FDU for additional assistance

Non-Discrimination Statement

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, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

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 State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint 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, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Non-Discrimination Statement

- Include the non-discrimination statement (NDS) on **ALL** materials including websites, brochures, and flyers. Websites may use the link to the NDS in lieu of the full statement. Nutrition Education information does not require the NDS.

- Also, regardless of the size, at a minimum, the full statement must be used on vital documents such as: (1) Applications; (2) Notification of Eligibility or Ineligibility; (3) Expiration of Certification Notification; and (4) Discontinuance Notification.

- Print size for the NDS shall be no smaller than the other text in the material.

Collecting & Reporting Participant Data for **CSFP**

- Recipient agencies are required to obtain data by race and ethnic category for applicants and participants in CSFP.
- Self-identification or self-reporting is the preferred method of obtaining data
  - Program applicants may not be *required* to furnish ethnicity and race
- Visual observation shall be used when the applicant does not self-identify
  - The applicant should be informed that a visual identification of his/her race and ethnicity will be made and recorded
  - Data collector may not second guess or change or challenge a self-declaration unless such declarations are patently false

Collecting & Reporting Participant Data for **CSFP**

A two-question format must be used for racial and ethnic categories for CSFP programs:

❖Ethnicity: is to be asked first
- Hispanic or Latino
- Not Hispanic or Latino

❖Race: instructions should specify “mark one or more”
- American Indian or Alaskan Native
- Asian
- Black or African American
- Native Hawaiian or other Pacific Islander
- White or Caucasian

Public Notification

- All CSFP and TEFAP partners are required to send out public notifications about their food distribution program(s) to potentially eligible persons *at least* once every two years.
- Include the required non-discrimination statement on ALL materials; including websites, agency publications, posters and informational materials provided to the public.
- Let applicants and participants at your site know the following:
  - Program availability,
  - Program rights and responsibilities,
  - The agency's policy of non-discrimination, and
  - The procedure for filing a complaint.

Public Notification, Continued

- Methods of Public Notification
  - Prominently display the USDA non-discrimination "And Justice For All" poster
  - Inform potentially eligible persons, applicants, participants, and grassroots organizations of programs or changes in programs; including information pertaining to eligibility, benefits & services, the location of local facilities or services, delivery points & hours of service
  - Provide appropriate information, including web-based information, in alternative formats for persons with disabilities

"And Justice For All" poster

- Notifies participants of Civil Rights
- Prominently display the poster where it is visible to all program participants
- Posted in point of service area (outside if the site is using a drive-thru model of distribution)



“And Justice For All” Poster Source

Your Partner Food Bank (if available)

Or

Food Distribution Unit, OKDHS
TEFAP & CSFP Programs at (405)521-3581
Or Sarah Bouse at sarah.bouse@okdhs.org
*if available – *currently posters are not available*

Written Notice of Beneficiary Rights - TEFAP

ALL TEFAP agencies are required to **post** this Written Notice of Beneficiary Rights in a location *visible to the applicants*. It is ideal to post the Written Notice of Beneficiary Rights in the same location as the "And Justice for All" poster.

If a pantry is using a drive-thru distribution model, the Written Notice and the "And Justice for All" poster must be in a location visible from the drive-thru line.

Written Notice of Beneficiary Rights for CSFP and TEFAP

Name of Organization:

Because (Name of CSFP and/or TEFAP partner agency here) is supported in whole or in part by financial assistance from the Federal Government, we are required to let you know that:

1. We may not discriminate against you on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice;
2. We may not require you to attend or participate in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) that are offered by our organization, and any participation by you in such activities must be purely voluntary;
3. We must separate in time or location any privately funded explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) from activities supported with direct Federal financial assistance; and
4. You may report violations of these protections, including any denials of services or benefits by an organization, by contacting or filing a written complaint with the

   U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   Executive Director Center for Civil Rights Enforcement
   1400 Independence Avenue SW Washington, DC 20250–9410,
   or by email to program.intake@usda.gov

5. If you would like to seek information about whether there are any other federally funded organizations that provide these kinds of services in your area, please contact the USDA Hunger Hotline:

The USDA Hunger Hotline:

- **By Phone**: **1-866-3-HUNGRY** or **1-877-8-HAMBRE** to speak with a representative from 7:00 AM – 10:00 PM Eastern Time.
- **By Text**: **914-342-7744** with a question that may contain a keyword such as "food," "summer," "meals," etc. to receive an automated response to resources located near an address and/or zip code.

This written notice must be given to you before you enroll in the program or receive services from the program, unless the nature of the service provided or exigent circumstances make it impracticable to provide such notice before we provide the actual service. In such an instance, this notice must be given to you at the earliest available opportunity.

Written Notice of Beneficiary Rights - CSFP

CSFP applicants and active participants must be **provided a copy** of the Written Notice of Beneficiary Rights.

*In Oklahoma, we have incorporated the Written Notice of Beneficiary Rights into the current uniform CSFP Application used by all CSFP partners across the state, thus all applicants receive the Notice when they apply.

Written Notice of Beneficiary Rights for CSFP and TEFAP

Name of Organization:

Because (Name of CSFP and/or TEFAP partner agency here) is supported in whole or in part by financial assistance from the Federal Government, we are required to let you know that:

1. We may not discriminate against you on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice;
2. We may not require you to attend or participate in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) that are offered by our organization, and any participation by you in such activities must be purely voluntary;
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This written notice must be given to you before you enroll in the program or receive services from the program, unless the nature of the service provided or exigent circumstances make it impracticable to provide such notice before we provide the actual service. In such an instance, this notice must be given to you at the earliest available opportunity.

Complaints

- Civil Rights Complaints may be based on the following: race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal/retaliation for prior civil rights activity
- Complaints may be written or verbal
  - Complaints may be made by phone, letter, email, fax, or any other form of communication
  - If receiving a verbal complaint, the staff/volunteer should write down the information for the complaint. ***Listen politely!***

Complaints, Continued

- May be anonymous
  - Anonymous complaints should be handled as any other complaint
- May be related to any area of Food Distribution operations
  - Program administration, food service, volunteers, employment, etc.
- Complaints must be filed within 180 days from the alleged date of discrimination (time frames must be adhered to), *unless* age discrimination, then 30 days

How to File a Complaint

- To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint 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, Mail Stop 9410, Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

How to File a Complaint, Continued

- If a local CSFP/TEFAP Partner or a Food Bank Staff Member receives a Civil Rights-related complaint, they must inform the complainant how to report the complaint to USDA. Refer the complainant to the USDA Civil Rights Office's contact information on the previous slide (which can also be found on the "And Justice for All" poster and on the Uniform TEFAP Intake Form and the CSFP Application).
- *Local partners and the Food Banks must inform the USDA Office of Civil Rights of all Civil Rights-related complaints, even if the reporting person does not have all of the information about the alleged issue/incident.*
- Local CSFP/TEFAP agencies should notify their respective Food Bank partner about all Civil Rights complaints.
- The Food Banks should make OKDHS/FDU aware of any Civil Rights complaints (made at the local level or to the Food Bank). OKDHS/FDU will notify OKDHS's Office of Civil Rights as well.

Complaint Tips

- Never discourage groups or individuals from filing a complaint or from reporting a potentially discriminatory situation
- Provide forms for written complaints
- Take detailed notes of verbal complaints
- Not all complaints are Civil Rights complaints. General complaints, such as a pantry guest not liking some of the food items in a food basket would not be a Civil Rights complaint and should not be forwarded to USDA's Office of Civil Rights. However, if a pantry guest alleges that they were given less food than other households of the same size because they belong to one of the protected classes, that is a potential Civil Rights-related complaint and should be handled as such.
- If a guest is verbally or physically aggressive towards other guests and/or volunteers, a CSFP/TEFAP partner agency can ask the person to leave, and law enforcement should be called if necessary.

Assurances

To qualify for Federal financial assistance: written assurance that the program will be operated in a nondiscriminatory manner must be included in all agreements between agencies (example – CSFP and TEFAP Letters of Agreement between local agencies and their partner Food Bank).

Compliance Reviews

- The Oklahoma CSFP and TEFAP Programs are evaluated by USDA Food and Nutrition Administration (FNA) regularly through the Management Evaluation (ME) Process. In turn, the State agency reviews its recipient agencies, and the recipient agencies review their sub-recipient agencies.
- These reviews may be conducted jointly or independently by Civil Rights and program staff. The review examines the activities of the State and local agencies, or other sub-recipients to determine if FN programs and activities are being administered within civil rights requirements. The office performing the review must advise the reviewed entity, in writing, of any findings and recommendations.
- A written report is provided by the reviewer to the reviewed entity, and a corrective action plan is required which outlines all actions taken to resolve issues identified as findings during the review. The State agency or recipient agency must follow up with the reviewed entity to ensure the issues have been corrected.

Compliance Reviews, Continued

- The purpose of a compliance review is to determine if the applicant or recipient agency of Federal financial assistance is in compliance with Civil Rights requirements
- Reviews can be completed:
  - Pre-award
  - Post-award
  - Special

Routine Compliance Reviews

- This is an on-site civil rights review conducted after an organization has been authorized to receive Federal financial assistance to ensure:
  - Prominent display of the "And Justice for All" poster
  - Providing annual Civil Rights and CSFP-TEFAP Back-to-Basics Training for staff/volunteers (this PowerPoint)
  - Procedures in place to handle Civil Rights complaints
  - Non-discrimination statement (NDS) on all printed materials and websites
  - Providing outreach materials to all eligible populations at least once every two years
  - Meeting the requirement for persons with disabilities, reasonable accommodations, and limited English proficiency (LEP).

Routine Compliance Review Questions

- Is USDA's "And Justice For All" poster prominently displayed where it can be seen by applicants, participants and visitors?
- Have the Civil Rights and Back-to-Basics CSFP/TEFAP Training and complaint procedures been provided to persons distributing USDA Foods?
- Do potentially eligible persons have an equal opportunity to participate?
- Does the agency publicize that it provides services to all persons without regard to race, color, national origin, age, sex, disability, or the other protected classes?
- Is the correct non-discrimination statement (NDS) on all printed materials?
- Is the building accessible? If not, what accommodations have been made to assist those with limited mobility/limited access?
- Is assistance made available to households with limited English proficiency (LEP)?

Resolution of Noncompliance

Definition of "Noncompliance"

A factual finding that any civil rights requirement as provided by law, regulation, policy, instruction, or guidelines, is not being adhered to by a State agency, local agency, or other sub-recipient agency.

- Steps must be taken immediately to obtain ***voluntary*** compliance

- Effective date of the finding of noncompliance is the date of notice to the State agency, local agency, or other subrecipient

What is Limited English Proficiency (LEP)?

Definition of LEP Persons:

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

- All organizations receiving Federal financial assistance have a responsibility to take reasonable steps to ensure "meaningful" access to their programs and activities by persons with LEP.

Limited English Proficiency (LEP) "Reasonable Steps" are contingent upon:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient
- The frequency with which LEP individuals come in contact with the program
- The nature and importance of the program, activity, or service provided by the program to people's lives
- The resources available to the recipient and costs. A shortage of resources does not eliminate the requirement for an agency to take reasonable steps

Limited English Proficiency (LEP)

- Potential Cost Reduction Solutions:
  - Using technological advances (i.e., translation devices on your computer or smart phone)
  - Sharing of language assistance materials and services among and between recipients, advocacy groups and social service agencies (i.e. Oklahoma Human Services)
  - Where appropriate, training bi-lingual staff to act as interpreters and translators, telephonic and video conferencing interpretation services, or the formalized use of qualified community volunteers
  - Standardizing documents to reduce translation needs
- Paid interpreters, bilingual staff, and/or the use of the **Linguistica International** translation line are the preferred methods for meeting LEP requirements.

Limited English Proficiency (LEP)

- Children who are minors should not be used as interpreters
- Volunteers may be used, but ensure they understand confidentiality
- See www.lep.gov for more information
- Agencies that fail to provide services to LEP applicants or deny them access to TEFAP & CSFP may be discriminating on the basis of National Origin in violation of Title VI.
- Please do not forget the Linguistica International translation line is available to CSFP and TEFAP partner agencies.

Reasonable Accommodations

- Ensure that people with disabilities and/or limited mobility can access your agency from the parking lot, and can use the entrances, halls, elevators, restrooms, etc., and the agency should allow service animals
- Arrange ways for people to get services. For example, if your program is in a basement and you do not have an elevator, staff/volunteers should be available on the main floor
- FedRelay Telecommunications Services to allow individuals who are deaf, hard of hearing, and/or have speech disabilities. www.gsa.gov/fedrelay



Customer Service: Making a Difference

- Treat all people with dignity and respect
- Answer questions in a voice that is non-threatening
- Clearly explain the rules to everyone, as well as their rights and responsibilities
- Recognize that participants have varied needs and (sometimes) few resources
- Notice when a person feels they have been treated in a rude manner
- Develop good listening skills
- Learn to put yourself in their shoes when necessary
- Learn to deal with a dissatisfied customer
- Ask yourself, “Am I treating this person in the same manner I treat others?”

Conflict Resolution

Key Points

- Typically, customers who are behaving in a difficult manner usually have not had their expectations met or do not fully understand the role of the worker.
- Often, the customer is focused on getting immediate assistance with solving a problem and does not feel the worker is helping.
- People generally do not want to be difficult or argumentative with a caring individual. The customer may not be aware of how their negative behavior is affecting others.

Conflict Resolution

❖Tips for working with people during difficult situations:

- Remain calm
- Be mindful of your tone of voice and body language.
- State that you want to help and ask how you can be of assistance.
- Using the information provided, determine what the issue is.
- Take time to try to understand the person's point of view. Listen for details about the concern, situation, or request. Repeat the concern or request to make sure you understand the person's expectations.
- When appropriate, apologize for the situation.
- Offer solutions. Take responsibility for finding a solution, or for putting a solution into action.
- Do not take the situation personally.
- Follow up. Personally make sure that the customer has been satisfied and provide feedback.

Conflict Resolution

- If you have tried to assist the person by providing the best customer service you can, and the person remains argumentative or outright abusive then do not allow yourself to be abused, and do not argue back. Keep your own sense of self-confidence but remain helpful.
- Anytime you feel that someone is truly physically threatening, get away from the person and call Law Enforcement.

Additional Resources

- Resources:

www.fns.usda.gov/cr/

www.ascr/usda.gov/

www.ascr.usda.gov/complaint_filing_cust.html#processing

www.lep.gov

www.fns.usda.gov/cnd/FRP/frp.process.htm

https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf

Contact Information for Questions about Civil Rights:

❖Questions or concerns? Please contact:

- Gina Kazerooni, Programs Administrator, Food Distribution Unit, (405) 521-3581, or gina.kazerooni@okdhs.org
- Sarah Bouse, Programs Manager, Food Distribution Unit, (405) 521-3581 or sarah.bouse@okdhs.org
- USDA Food and Nutrition Service, Southwest Region, Regional Civil Rights Director, (214) 290-9837



Annual Back-to-Basics Training for CSFP and TEFAP Local Partners

This training should be provided to all potential CSFP and TEFAP partners prior to USDA approval by the Food Bank and/or OKDHS.

Additionally, this training should be reviewed by all existing CSFP and TEFAP partners *annually*, along with the yearly Civil Rights Training (the first section of this PowerPoint).

Overview

Records Retention Requirements

Back-to-Basics: CSFP and TEFAP Reminders

Compliance Self-Review Checklist

Records Retention Requirements

Section One



Records Retention Requirements – **TEFAP Local Partners**

Records considered *permanent*:

- USDA/TEFAP Letter of Agreement (LoA)

The following shall be retained for a period of *3 years from the close of the Federal Fiscal Year to which they pertain*, or longer if related to an audit or investigation in progress:

- Intake Forms (Uniform TEFAP Intake Form) - pantries
- Distribution Logs (households receiving TEFAP food and date of receipt)- pantries
- Meal Count Logs/Meal Sign-in Records - emergency shelters and meal sites
- Signed Invoices from the Food Bank
- Pest Control Records (Invoices or Logs)
- Temperature Logs - all freezers and refrigerators used for USDA foods
- Civil Rights and Back-to-Basics CSFP/TEFAP Training Certificates (aka Attendance Sheets)

Records Retention Requirements – **CSFP Local Partners**

Records considered *permanent*:

- USDA/CSFP Letter of Agreement (LoA)

The following records shall be retained for a period of *3 years from the close of the Federal Fiscal Year to which they pertain*, or longer if related to an audit or investigation in progress:

- CSFP Applications (includes active participant applications, denied applications, and the previous certification's applications if less than 4 years old)
- Distribution Records, including home delivery lists
- Signed Invoices from the Food Bank
- Temperature Logs for all freezers and refrigerators used to store USDA foods
- Civil Rights and Back-to-Basics CSFP/TEFAP Training Certificates (aka Attendance Sheets)



Back-to-Basic: CSFP and TEFAP Reminders

Section Two

Food Losses

For CSFP and TEFAP Food Losses:

- Local Partners should report losses of a case of USDA product or more due to damage or spoilage to their partner Food Bank
- Losses at the local level or at the Food Bank warehouse valued at $400 or more should be reported to OKDHS
- OKDHS must report losses valued at $500 or more to USDA – depending on the circumstances, USDA may "forgive" the loss or ask for replacement in-kind or repayment
- ALL losses due to theft, embezzlement, or other forms of fraud should be reported to OKDHS - *regardless of value* - and will be investigated

USDA Food Storage Highlights:

USDA Foods must be

a) stored separately from non-USDA items and labeled as "USDA," *or*
b) labeled in a manner so the USDA items can be distinguished from non-USDA products

USDA Food Storage Highlights:

- Temperatures – checked *and recorded* at least *once every 7 days*
- Pest control – log or invoices to show pest prevention measures
- Follow FIFO (first in, first out) and do not “stockpile” USDA Foods
- Retain temp logs, pest control records, and invoices from the Food Bank for 3 years plus the current fiscal year

TEFAP Eligibility

Things to remember about TEFAP Eligibility:

- Pantries must use the current Uniform TEFAP Intake Form to assess household eligibility – pantries cannot use their own intake form for TEFAP.
- If a pantry uses a Service Insights intake form or other intake form in addition to the Uniform TEFAP Intake Form, it must be identified as "optional" and households must be informed that it is not required for TEFAP eligibility.
- The Income Eligibility Guidelines (IEGs) for TEFAP change *annually* – please always ensure the correct IEGs are used for eligibility determination.
- All Uniform TEFAP Intake Forms must be complete (no missing info)
- New households should complete a Uniform TEFAP Intake Form during the first visit to the pantry to assess eligibility, and then all households will complete an intake form annually for recertification.
- *Shelters and Meal Sites – no Intake form is required, but the site must maintain meal count records for 3 years plus the current fiscal year.

TEFAP Eligibility, Continued

Other things to remember about TEFAP Eligibility:

- Pantries cannot require an applicant to provide proof of identity *for TEFAP
- Pantries cannot require an applicant to provide proof of residency *for TEFAP
- A pantry may *request* an ID and/or proof of residency *for non-USDA food eligibility*, but an applicant cannot be denied TEFAP for declining to provide either item
- Household income, household size (how many individuals make up the household), identity, and residency are self-declared for TEFAP
- Shelters and Meal Sites – meal recipients do not have to demonstrate that they are "needy," but the site should primarily provide meals to food-insecure populations.

CSFP Eligibility

Reminders for CSFP Eligibility:

- CSFP applicant eligibility is based on the individual's age, household income, and where they reside.
- A senior must be age 60 or over, their self-declared income at or below the current Income Eligibility Guidelines (IEGs) for CSFP, and they must reside in an area of Oklahoma served by the CSFP distribution site where they applied for the program.
- Applicants shall provide a form of ID when they initially apply and every two years for recertification. The ID must show the person's name and DOB.
- Seniors can only receive one CSFP food package per month – they cannot participate in the program at more than one location at a time; this is called Dual Participation and is considered a violation of CSFP rules and cause for discontinuation.

CSFP Eligibility, Continued

Additional reminders for CSFP:

- *Written* Notices are required when a CSFP site takes the following actions: a) certification, b) waitlist placement, c) denial, and d) discontinuation.
- These Written Notices can be emailed, mailed, or provided in person to the applicant/participant.
- Sites should maintain a waitlist to best utilize the assigned caseload; if an active participant does not pick up their box for the month, a person on the waitlist can receive it for a one-month temporary certification. *This reduces the risk of leftover CSFP boxes*.

Annual Compliance Self-Review Checklist

Section Three

Annual Compliance Self-Review Checklist Page 1

	YES	NO	N/A
FOR ALL CSFP and TEFAP Partners – are the following items on file and maintained for 3 years plus the current fiscal year?	_	_	_
Intake/Eligibility Forms (Uniform TEFAP Intake Form or CSFP Application) or Meal Count Records (for Meal Sites and Shelters)			_
Distribution Records (CSFP Distribution Logs or TEFAP Distribution Logs - Pantries)			
Invoices from the Food Bank (signed)			_
Annual Civil Rights and CSFP-TEFAP Back-to-Basics Training Attendance Sheets			_
For CSFP and TEFAP sites providing home deliveries – route lists also retained?			
For All TEFAP Partners and CSFP Partners that store CSFP boxes and cheese – are the following items also on file and maintained for 3 years plus the current fiscal year?	_	_	_
Temperature Logs (temps checked and recorded at least once every 7 days)			
Pest Control Invoices/Logs (shows date of treatment and person responsible)			

Annual Compliance Self-Review Checklist Page 2

	YES	NO	N/A
FOR ALL CSFP and TEFAP Partners:	_	_	_
Is your EIN (IRS tax-exemption number) on file?			_
Has your agency's EIN changed in the last year? If so, was the new number reported to the Food Bank?			
Have your days/hours of operation or address changed in the last year?			
If your hours have changed or your address, have you reported the new information to the Food Bank?			
Has your primary contact information changed in the last year? If so, have you reported the new information to the Food Bank?			
Does the Food Bank have an email address on file for your agency's main contact person? Is this email account checked *regularly*? If not, please provide a monitored email address to the Food Bank.			
Do *all* your team members who interact with the public and/or who determine eligibility for CSFP or TEFAP food receive this training *annually*?			

Thank You!

Questions? Please reach out!

Contact:

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OKLAHOMA
Human Services