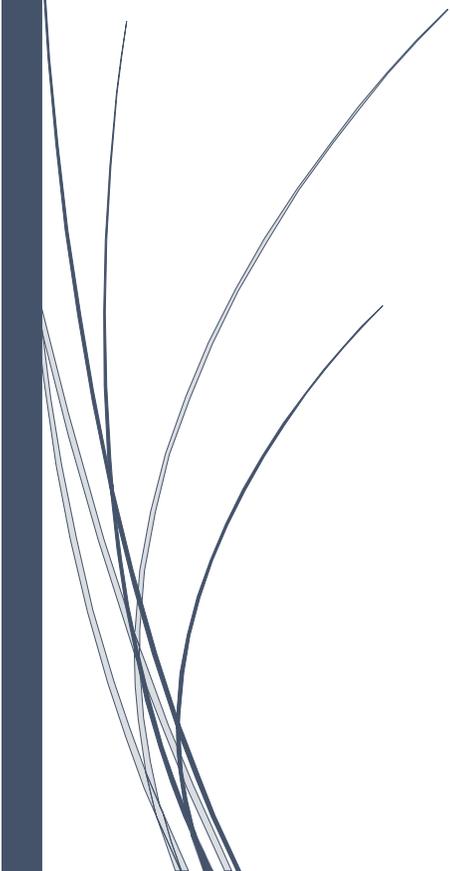


**District of Columbia  
Commodity Supplemental Food Program**

**STATE PLAN**



## Contents

<b>1. EXECUTIVE SUMMARY</b>	<b>5</b>
<b>2. STATEMENT OF NEED</b>	<b>8</b>
<b>3. ORGANIZATIONAL STRUCTURE</b>	<b>8</b>
A. State Agency Contact	8
A. Local Agency Contact	9
B. Distribution Locations	9
<b>4. PROGRAM MANAGEMENT AND ADMINISTRATION</b>	<b>9</b>
A. State and Local Agency Responsibilities	9
<b>5. PARTICIPANT ELIGIBILITY REQUIREMENTS</b>	<b>10</b>
A. Age	10
B. Food Program Income Guidelines	10
C. Residency	10
D. Documentation of Age, Income, and Residency	10
E. Nutritional Risk Criteria	11
<b>6. DISTRIBUTION SITE REQUIREMENTS</b>	<b>11</b>
A. Distribution Site Agreements	11
B. Distribution and Use of CSFP Commodities	11
C. Waitlists	11
<b>7. PARTICIPANT CERTIFICATION</b>	<b>12</b>
A. Annual Certification	12
B. Notification of the Expiration of Certification Period	12
C. Certification When a Participant Moves from One CSFP Site to Another	12
D. Eligibility Determination	13
E. The Use of Proxies	13
F. Standards to Determine the Cost-Effectiveness of a Claim against a Participant	13
<b>8. CASELOAD MANAGEMENT AND OUTREACH PLAN</b>	<b>13</b>
A. Outreach Strategies for Home Bound Seniors	14
<b>9. DUAL PARTICIPATION PREVENTION</b>	<b>14</b>
A. Detecting Dual Participation at Enrollment	14
B. Detecting Dual Participation during Distribution	14
C. Methods Used to Inform Applicants of the Illegality of Dual Participation	14
<b>10. NOTIFICATION OF DISCONTINUANCE OF PARTICIPATION</b>	<b>15</b>
<b>11. NUTRITION EDUCATION PLAN</b>	<b>15</b>
A. Nutrition Education Plan	15

<b>12. SYSTEM FOR STORING AND DISTRIBUTING COMMODITIES .....</b>	<b>16</b>
A. Receiving .....	16
B. Packaging .....	16
C. Inventory Practices .....	16
D. Distribution .....	16
E. Food Safety .....	16
F. Food Safety Recall Procedures.....	16
G. Out-of-Condition Foods .....	17
<b>13. COPIES OF AGREEMENTS .....</b>	<b>17</b>
A. Memorandum of Understanding Between DC Health and DACL .....	17
B. Agreement between DC Health and Local Agency .....	17
<b>14. PROGRAMMATIC ASSURANCES.....</b>	<b>17</b>
A. Management Reviews.....	17
<b>15. ATTACHMENTS.....</b>	<b>18</b>
<b>Attachment A DC CSFP Operations Manual .....</b>	<b>18</b>
<b>Attachment B DC CSFP Distribution Sites list .....</b>	<b>18</b>
<b>Attachment C Current Year Income Eligibility Guidelines .....</b>	<b>18</b>
<b>Attachment D Acceptable Sources of Documentation of Age, Income, and Residency .....</b>	<b>18</b>
<b>Attachment E USDA Foods Available List for CSFP .....</b>	<b>18</b>
<b>Attachment F Maximum Monthly Distribution Rates.....</b>	<b>18</b>
<b>Attachment G DC CSFP Caseload Management and Outreach Plan.....</b>	<b>18</b>
<b>Attachment H DC CSFP Nutrition Education Plan.....</b>	<b>18</b>

# **THE COMMODITY SUPPLEMENTAL FOOD PROGRAM (CSFP)**

## **Fiscal Year 2020 State Plan**

Prepared by:

DC Department of Health

Nutrition and Physical Fitness Bureau

899 North Capitol Street NE

Washington, DC 20002

Last Updated in April 2019

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 any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call 866-632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax: 202-690-7442; or (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

## 1. EXECUTIVE SUMMARY

### **The District of Columbia Department of Health Mission Statement**

The District of Columbia Department of Health (DC Health) promotes health, wellness and equity across the District and protects the safety of residents, visitors, and those doing business in the nation's Capital.

### **Summary of DC Health Services**

The Department of Health provides programs and services with the goal of reducing the burden of disease and improving opportunities for health and well-being for all District residents and visitors. DC Health does this through a number of strategies that center around the following priorities:

1. Promoting a Culture of Health & Wellness;
2. Addressing Social Determinants of Health;
3. Strengthening Public-Private Partnerships;
4. Closing the Chasm between Clinical Medicine and Public Health; and
5. Implementing Data Driven and Outcome Oriented Approaches to Program & Policy Development

### **Health Equity in the District of Columbia**

Health equity is defined by the World Health Organization as the "attainment of the highest level of health for all people." Health inequity is an economic and a social justice reality that exists in the District of Columbia. Health inequities result in lower quality of healthcare, disparate health outcomes for minority racial/ethnic populations and people with low socioeconomic status, increased direct and indirect healthcare costs, and decreased workforce productivity.

In keeping with a Health in All Policies (HiAP) approach, DC Health continues to collaborate with a wide range of partners such as hospitals, community health centers, land use/planning agencies, state and independent advisory bodies, housing agencies, transportation agencies, schools, food agencies, parks and recreation, law enforcement, and the state Medicaid agency to carry out its mission.

### **Commodity Supplemental Food Program in the District of Columbia**

DC Health serves as the State Agency for the administration of the DC Commodity Supplemental Food Program (CSFP) and ensures that the Program complies with all provisions of 7 CFR Part 247 and with the provisions of 7 CFR Part 250 as applicable. CSFP is a comprehensive nutrition and wellness program whose goals align with those of the Age-Friendly DC initiative (AFDC) and the 2019-2022 District of Columbia State Plan on Aging (SPOA). This

State Plan reflects recommendations made in both the 2017 DC Health Systems Plan and the 2018 Health Equity Report. The State Plan aims to provide an approach focused on closing the food access gap for the aging population in the District ensuring that seniors have access to food and other services that meet their everyday needs. The three major priorities of DC CSFP are:

1. Promote health and wellness among District seniors, targeting underserved geographical areas, homeless residents, and homebound seniors
2. Implement an age-friendly food, nutrition and wellness program, in an equitable, sustainable way
3. Positively impact food security among seniors living in the District

AFDC, guided by the Age-Friendly DC 2023 Strategic Plan, promotes District-wide policies and procedures that make the District an easier place to grow older. Age-Friendly DC is focused on providing community support and health services by ensuring that the District encourages wellness and active aging through the attainment of exceptional health outcomes. The SPOA will evaluate and identify potential areas of improvement in the delivery of services for the aging population by partnering with government agencies and local wellness programming within the District. DC CSFP goals are aligned with the District's goal to promote a stronger sense of physical, mental, and financial security among seniors as they grow older through lifelong health and security initiatives. CSFP, AFDC and SPOA initiatives include current partnerships with the Supplemental Nutrition Assistance Program Education (SNAP-Ed), Senior Wellness Centers, and other government agencies throughout the District.

This State Plan shares DC Health priorities related to its senior population, key partnerships critical to helping residents age in place, and strategies for administering the Commodity Supplemental Food Program. The State Plan also highlights major program policies and procedures and provides details about how the program is implemented. Lastly, the State Plan includes both the Nutrition Education Plan (NEP) and the Caseload Management/Outreach Plan. The DC CSFP Operations Manual, is a supplement to this State Plan and provides details around standard operating procedures and policies. See **Attachment A: DC CSFP Operations Manual**.

The District of Columbia Commodity Supplemental Food Program is administered by the DC Health's Community Health Administration (CHA), specifically the Nutrition and Physical Fitness Bureau (NPFB). Using a collective impact approach, the NPFB coordinates efforts with public and private partners to promote healthy behaviors and environments that improve health outcomes and reduce disparities in the leading causes of mortality and morbidity in the District. CHA and NPFB focus on nutrition and physical fitness promotion; cancer and chronic disease prevention and control; access to quality health care services, particularly medical and dental homes; and the health of families and individuals across the lifespan.

CHA's approach targets behavioral, clinical, and social determinants of health through evidence-based, data-informed programs, policy, and system level interventions. The DC Commodity Supplemental Food Program State Agency (State Agency) aims to address social determinants of health through its work with partners and stakeholders to provide the full range of CSFP services.

CSFP benefits include nutritious supplemental foods, nutrition education and referrals to health care, social service, and other community providers offering services for seniors. Health behaviors, such as food choices, are often shaped by environments and policies that originate outside of the public health sector. Therefore, addressing behavior change requires significant cross-sector collaboration. CSFP participation can also provide opportunities for social interaction, important to overall health and wellness for seniors.

## **Key Partnerships**

The Nutrition and Physical Fitness Bureau continues to rely on multi-sector collaborations with its partners in senior wellness to promote CSFP utilization and to address barriers to program participation. These partners include the DC Department of Aging and Community Living (DAACL), the Department of Parks and Recreation (DPR), the Office of Planning (OP), and the University of the District of Columbia (UDC). Partners in healthcare include AmeriHealth Caritas, Unity Health Care, Community of Hope and Medical Home Comprehensive Care. Non-governmental community partners include the Capital Area Food Bank, Martha's Table, Share Our Strength, Food and Friends, DC Central Kitchen, DC Hunger Solutions, DC Greens, the American Heart Association, and the DC Farmers' Market Collaborative.

These partners have joined DC Health in its efforts to improve healthful food access to all residents, particularly seniors. They collaborate closely with the NPFB on its locally funded Healthy Food Access Initiatives (HFAI) including the Produce Plus Program (PPP), Produce Prescription (PRx), Healthy Corners Stores Partnerships, home delivered meals for chronically ill residents, and the Joyful Food Markets(JFM).

**Produce Plus Program**, funded through the District's Budget Support Act (BSA), allows residents to purchase locally grown fresh fruits, vegetables, and herbs. The program supports local farmers who provide healthier fruit and vegetable options for DC residents. Produce Plus runs from June 1<sup>st</sup> through September 30<sup>th</sup> of each year. The Program reaches approximately 10,000 District residents, predominantly seniors, annually.

**Produce Prescription** (formerly known as Fruit and Vegetable Prescription FVRx), a component of the Produce Plus Program, is a partnership between Unity Health Care, Inc., Community of Hope, Medical Home Comprehensive Care, AmeriHealth Caritas, DC Greens, and DC Health. Patients enrolled in various nutrition and health programs at participating health care facilities are prescribed healthful fruits and vegetables as part of their medical intervention. Short-term benefits include improved medical appointment compliance and increased farmers' market utilization. Long-term benefits of the program are currently being assessed.

**Healthy Corners Stores Partnership** is a project begun by DC Central Kitchen that supports healthful food options at the retail level. Residents are offered checks for healthful foods that are redeemed in markets that have partnered with DC Health. These markets coordinate health education sessions and food demonstrations, for participants. The Program reaches approximately 825 District residents annually.

**Home Delivered Meals** for the chronically ill are provided to District residents through an award made to Food and Friends. Food and Friends employs health care and food service professionals to offer a full spectrum of nutrition services including food that helps relieve the healthcare burdens associated with being chronically ill and home bound. The Program reaches approximately 500 District residents annually.

**Joyful Food Markets**, funded through the District’s Budget Support Act (BSA), are set up monthly at schools located in Wards 5, 7, and 8. Students receive up to 23 pounds of healthful foods along with targeted health and wellness education. JFM is noted here because of the role that seniors as grandparents play in the family setting.

## 2. STATEMENT OF NEED

There are over 105,000 seniors (age 60+) in the District of Columbia. In 2014-2016, 10.4% of households with seniors in D.C. experienced food insecurity. The National Foundation to End Senior Hunger estimates that nearly one in five seniors are at risk of hunger in DC, while 15% of District residents age 60 or older (more than 15,000 individuals) live below the federal poverty level. The District’s food insecurity and poverty rates present a strong case for the need to develop and maintain a robust caseload for the DC CSFP.

DC Health recognizes CSFP as a key component to ending senior hunger. The District commits to providing comprehensive program management while continuing to expand outreach activities in Fiscal Year 2020 and beyond.

## 3. ORGANIZATIONAL STRUCTURE

*Reference:* 7 CFR §247.3(a)

*Citation:* CSFP is administered at the Federal level by the Department’s Food and Nutrition Service (FNS) which provides commodities, assigns caseload, and allocates administrative funds to State agencies. State agencies are responsible for administering the program at the state level. The State agency may select local agencies to administer the program in local areas of the state. The State agency must provide guidance to local agencies on all aspects of program operations. The state agency may also select subdistribution agencies to distribute or store commodities or to perform other program functions on behalf of the State agency. Local or subdistribution agencies may also elect other agencies to perform specific program functions with the state agency’s approval. Although the State agency may select other organizations to perform specific activities, the State agency is ultimately responsible for all aspects of program administration.

DC Health is the administering agency that operates the Commodity Supplemental Food Program (CSFP) in the District of Columbia. The Capital Area Food Bank (CAFB), a local nonprofit organization, is the Local Agency (LA) authorized to provide CSFP services on behalf of the District of Columbia. Contact information for both organizations are listed below:

### A. State Agency Contact

Amelia Peterson-Kosecki, Bureau Chief  
State Agency CSFP Director  
DC Department of Health  
899 North Capitol Street, NE  
Community Health Administration, 3rd Floor  
Washington, DC 20002  
Phone: (202) 442-9140  
Website: <https://doh.dc.gov/>

Karen Franco  
State Agency CSFP Program Coordinator  
DC Department of Health  
899 North Capitol Street, NE  
Community Health Administration, 3<sup>rd</sup> Floor  
Washington, DC 20002  
Phone: (202) 442-5891  
Website: <https://doh.dc.gov/>

#### A. Local Agency Contact

Marian Peele, Director, Grocery Plus (CSFP and SFMNP)  
Capital Area Food Bank (CAFB)  
4900 Puerto Rico Avenue, NE  
Washington, DC 20017  
Phone: (202) 644-9800  
Website: <https://www.capitalareafoodbank.org/>

#### B. Distribution Locations

DC CSFP distribution takes place at over 71 locations in all eight wards of the city.

See **Attachment B**: DC CSFP Distribution Sites for a complete list of distribution sites.  
All distribution sites are under the jurisdiction of the Local Agency.

## 4. PROGRAM MANAGEMENT AND ADMINISTRATION

### A. State and Local Agency Responsibilities

*Reference:* 7 CFR §247.5

*Citation:* The State agency may delegate some responsibilities to another agency; however, the State agency is ultimately responsible for all aspects of program administration.

Below is a brief description of State Agency and Local Agency responsibilities. A more detailed list is found in the DC CSFP Operations Manual.

The **State Agency** is responsible for ensuring that program requirements are being met including, but not limited to, the following:

1. Implementing a State Plan that lists state level priorities and detail show federal and local CSFP requirements will be met.
2. Providing guidance and technical assistance to the Local Agency by way of State Plans, an operations manual, CFR and memoranda.
3. Managing caseload through a variety of practice and evidence based strategies.
4. Establishing eligibility guidelines in accordance with Federal regulations.
5. Conducting biennial (every two years) administrative reviews of Local Agency programmatic activities including competency based training, caseload management, participant certification and notification procedures, nutrition education, outreach, recordkeeping and civil rights compliance.
6. Conducting biennial (every two years) reviews of Local Agency USDA Foods management procedures including ordering, inventory, food safety and insurance.

The **Local Agency** is responsible for providing direct services to District seniors and operating the CSFP program in accordance with regulations, policies and procedures, including, but not limited to, the following:

1. Conducting the full range of certification and distribution services as outlined in regulations, policies and procedures, and memoranda.
2. Determining an applicant's eligibility in accordance with Federal regulations.
3. Ensuring that participation does not exceed monthly caseload.
4. Conducting the full range of responsibilities related to USDA Foods ordering, receiving, storing, food safety insurance, and distribution.
5. Safeguarding CSFP commodities from theft, spoilage, damage, destruction or other loss.
6. Conducting physical inventories of product received from the USDA and maintaining inventories as required by CSFP regulations.
7. Meeting all reporting requirements.

## 5. PARTICIPANT ELIGIBILITY REQUIREMENTS

*Reference:* 7 CFR §247.5

*Citation:* The State agency may delegate some responsibilities to another agency; however, the State agency is ultimately responsible for all aspects of program administration.

### A. Age

As of November 3, 2017, the DC CSFP is only serving eligible seniors. Senior citizens enrolled to participate in the DC Commodity Supplemental Food Program shall be not less than 60 years of age.

### B. Food Program Income Guidelines

Program regulations at 7 CFR Part 247.9(c) require that elderly persons have a household income at or below 130 percent of the Poverty Guidelines to be eligible for CSFP. **See Attachment C:** Current Year Income Guidelines.

### C. Residency

*Reference:* 7 CFR §247.9(a)

Senior citizens enrolled to participant in the DC Commodity Supplemental Food Program are required be residents of the District of Columbia.

### D. Documentation of Age, Income, and Residency

All residents applying for DC CSFP provide proof of age, income\*\*, and residency by presenting at least one of the following documents in each category. To decrease the burden associated with program participation, the District allows applicants to self-declare income\*\*. **See Attachment D:** Acceptable Sources of Documentation of Age, Income, and Residency for a more exhaustive list.

Proof of Age	Proof of Income**	Proof of Residency
Driver's License(valid)	Social Security Payments	Bill with current address (medical, cable, credit card, utility bill)
Birth Certificate	Pensions/Veteran's Payments	Bank account statement
Passport/Visa	Earning Statement	Current paystub
State ID	SNAP household certificate	Current SSI check

#### E. Nutritional Risk Criteria

Reference: 7 CFR §247.6(3)

The DC CSFP does not evaluate nutrition risk as a criterion for CSFP.

### 6. DISTRIBUTION SITE REQUIREMENTS

Reference: §247.10

Citation: *The requirements for distributing commodities to eligible CSFP participants and the methods used to accomplish this task.*

#### A. Distribution Site Agreements

The Local Agency (LA) is responsible for identifying convenient, accessible sites for distributing CSFP. The LA is required to enter into formal agreements that include Civil Rights training, and Justice For All compliance, and regulations related to providing services in places of religious activity with all sites prior to distribution. The LA is responsible for any loss resulting from improper distribution, or improper storage, care, or handling of commodities for all sites receiving USDA Foods.

Site agreements will be update every three years or when there has been a change in management.

#### B. Distribution and Use of CSFP Commodities

The contents of the monthly CSFP food package are determined based on the established USDA Foods Available List for CSFP and the guidance provided in the Maximum Monthly Distribution Rates table. All packages conform to FNS guidelines and reflect cultural and ethnic preferences of the target audience, when possible. The Local Agency is responsible for ensuring that the distribution sites distribute only one box of commodities to each participant on a monthly basis. See **Attachments E and F: USDA Foods Available List (E) and CSFP Maximum Monthly Distribution Rates (F)**

#### C. Waitlists

DC CSFP will serve up to the maximum assigned caseload. Once the assigned maximum caseload has been reached, additional applicants shall be placed on a waiting list and served first come first served. The State Agency and Local Agency use the waitlist as part of the statewide caseload management strategy.

## 7. PARTICIPANT CERTIFICATION

Reference: §247.8 - 247.9, 247.13, 247.15

Citation: *Eligibility for CSFP participation will be determined based on Federal regulations governing the Program and upon completion of a certification form developed by the State agency and approved by Food Nutrition Service Regional Office (FNSRO).*

### A. Annual Certification

Currently, eligible senior citizens are certified annually in May. Based on guidelines issued in 2019, to be implemented in Fiscal Year 2020, the DC CSFP certification period will be extended to three years. Applicants shall meet all eligibility criteria at the time of certification before benefits can be issued. During certification, Local Agency staff shall inform the applicant that the CSFP applies program standards without discrimination by race, color, national origin, age, sex, or disability.

Applicants and recertifying participants are advised verbally and in writing by Local Agency staff of their rights, obligations and the fair hearings process. Participants are required to sign the application/certification form confirming that they been advised.

The Local Agency is responsible for documenting all applications received as having been reviewed, the date reviewed and whether the applicant was approved, denied, or waitlisted. Certification periods may not exceed three years in length. The Local Agency will perform a yearly review to confirm that the participant:

1. Has an unchanged address,
2. Still wishes to take part in the program

More information can be found in the DC CSFP Operations Manual.

### B. Notification of the Expiration of Certification Period

The Local Agency shall notify participants in writing at least fifteen (15) calendar days before the expiration date that eligibility for CSFP is about to expire. The notification of expiration shall include the required statement that informs the participant that CSFP applies program standards without discrimination by race, color, national origin, age, sex, or disability.

### C. Certification When a Participant Moves from One CSFP Site to Another

Local Agency staff follow the verification of certification procedure when certifying participants who move from one CSFP area to another. This includes verifying that the certification has not expired (per 7 CFR 247.16(c)). Transferring participants are given the opportunity to continue to receive CSFP benefits for the duration of the certification period based on the following process:

- A. The distribution site that determined the participant's eligibility must provide verification of the expiration date of the certification period to the participant upon request.
- B. If the Local Agency has a waiting list, the participant shall be placed on the distribution site waiting list ahead of all other waiting applicants.

More information can be found in the DC CSFP Operations Manual.

#### D. Eligibility Determination

Applicants are notified in writing of the results of the eligibility determination.

If the applicant is ineligible, the notification identifies the eligibility requirement(s) that the applicant did not meet. The notification also informs the applicant of his/her right to a fair hearing to appeal the ineligibility determination. The Local Agency shall provide every ineligible applicant with referral information on how to access other local food assistance resources.

#### E. The Use of Proxies

CSFP participants may designate up to two proxies on their CSFP enrollment form to collect their CSFP box in their absence. The Local Agency informs all proxies that Federal regulations require that CSFP food be used by the participant only and may not be sold, traded or used by another. The use of proxies is an integral part of the DC CSFP caseload management strategy.

More information can be found in the DC CSFP Operations Manual.

#### F. Standards to Determine the Cost-Effectiveness of a Claim against a Participant

DC Health has established the following cost effective standard:

The pursuit of a claim against a participant to recover the value of CSFP commodities improperly received or used is cost effective when the participant has violated the policy for six months or longer (the certification period) or exceeded \$300, which is the average retail value per month over a six-month period of a food package. The Local Agency is required to use this standard in determining if a claim is to be pursued and to pursue claims in accordance with 7 CFR, Part 247.30 and applicable DC Health policies and procedures.

More information can be found in the DC CSFP Operations Manual.

### 8. CASELOAD MANAGEMENT AND OUTREACH PLAN

*Reference:* §247.6 (c)(5)

*Citation:* *Develop and implement a process by which the State and local agencies partner with organizations within the community to educate the targeted population about the CSFP.*

Outreach, community engagement, the use of waiting lists and proxies, along with strategic partnership building form a cornerstone of DC CSFP caseload management planning. It is a way of conducting business to ensure that eligible seniors, their families, along with public and private partners are made aware of, understand, and have a working knowledge of CSFP and the benefits of participation. Intentional, results based, outreach driven data and evidence based strategies will ensure that program resources are equitable, accessible, and utilized to fully serve the annual authorized caseload.

DC Health and its Local Agency partners continue to reach out to elderly populations, primarily with the help of the DC Department of Aging and Community Living (DACL) Senior Service Network and other partner organizations in the District to educate seniors about its nutrition programs including the Commodity Supplemental Food Program.

Monthly monitoring of site participation and other performance indicators will occur in order to inform and implement approved caseload management strategies, particularly when participation falls below 98%.

#### A. Outreach Strategies for Home Bound Seniors

The CSFP State Agency will work with all of its partners to identify seniors that are eligible for the home delivery program. This will consist of targeting current home bound seniors in the District, maintaining active partnerships with community-based organizations, and establishing a referral network throughout the District. Local Agency partners will prioritize home bound senior CSFP delivery as part of its caseload management strategy.

See **Attachment G**: District of Columbia CSFP Caseload Management and Outreach Plan.

### 9. DUAL PARTICIPATION PREVENTION

*Reference:* §247.19

*Citation:* *The State agency and local agencies are responsible for monitoring CSFP to prevent dual participation.*

#### A. Detecting Dual Participation at Enrollment

Dual participation is strictly prohibited. The State Agency has the responsibility to monitor Local Agency efforts to prevent dual participation. The Local Agency is responsible for ensuring that all applicants and participants are aware that dual participation is prohibited and for providing written materials advising of the penalty for doing so.

The Local Agency is required to use an automated management information system(s) (MIS) to manage relevant aspects of CSFP including participation and to take appropriate action when dual participation is discovered. That action will include advising the participant of the violation and imposing the appropriate penalty.

#### B. Detecting Dual Participation during Distribution

The Local Agency is required to implement procedures to prevent and detect dual participation. This includes implementing standard operating procedures during food package distribution. Steps to reduce dual participation include requiring identification from the participant or proxy during every pickup and securing a signature for each package distributed.

#### C. Methods Used to Inform Applicants of the Illegality of Dual Participation

During the certification, re-certification and distribution processes, participants and proxies receive verbal and written notification of prohibitions on dual participation. Participants and applicants receive written notification and are verbally advised of the illegality of dual participation when they pick up CSFP food packages (boxes).

More information about dual participation can be found in the DC CSFP Operations Manual

## 10. NOTIFICATION OF DISCONTINUANCE OF PARTICIPATION

Reference: §247.12, 247.17

Citation: *The local agency is responsible for notifying an applicant/participant when benefits are denied or discontinued due to fraudulence, ineligibility, or lack of commodities.*

When presented with evidence that a participant is no longer eligible for CSFP benefits or if there is evidence that the applicant, participant, caretaker, or proxy fraudulently applied for or received program benefits, the participant may be disqualified from the CSFP for a period of up to one year unless the Local Agency determines the disqualification would result in a serious health risk. When being notified of discontinuation, participants shall receive:

1. a written notification of discontinuance of participation
2. notification of their right to receive a fair hearing to appeal a disqualification determination

The notice shall inform the participant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability.

If a participant is no longer eligible to receive CSFP commodities, the Local Agency shall provide the participant with written notification of discontinuance at least 15 calendar days before the effective date of discontinuance. The written statement shall also contain information on the participant's right to a fair hearing to appeal this decision.

More information can be found in the DC CSFP Operations Manual.

## 11. NUTRITION EDUCATION PLAN

Reference: §247.18

Citation: *The State agency shall create and implement a nutrition education plan in accordance with CSFP regulations. Evaluation procedures shall be established to allow participants to provide feedback as to the effectiveness of the plan.*

### A. Nutrition Education Plan

The CSFP Nutrition Education Plan for the District of Columbia includes delivery of evidence-based, behavior focused curricula and activities that promote healthy eating and active lifestyles. The State Agency CSFP Director is responsible for providing guidance and facilitating training needed by the Local Agency nutrition staff and other partners to deliver effective evidence-based nutrition education services to CSFP participants. The DC CSFP will use CSFP foods to conduct cooking demonstrations as part of the nutrition education provided to program participant as allowed per CFR §247.18 (b).

See **Attachment H: DC CSFP Nutrition Education Plan.**

## 12. SYSTEM FOR STORING AND DISTRIBUTING COMMODITIES

Reference: §247.6(c)(6); §250.12; and §250.14;

### A. Receiving

USDA Foods are shipped directly to the Local Agency warehouse from the multi-food warehouse and commercial food manufacturers under USDA contract. DC Health approves all direct shipment requests submitted by the Local Agency into the Web-Based Supply Chain Management System (WBSCM) and monitors all multi-food shipment requests placed into WBSCM by the Local Agency. The Local Agency is responsible for the receipt and storage of commodities, keeping an accurate and up to date inventory of all foods, the preparation and distribution/delivery of the food packages, and maintaining food safety standards at all times. Detailed policies and procedures involving food management can be found in the DC CSFP Operations Manual

### B. Packaging

Distribution sites, under agreement with the Local Agency, assure that adequate care and security is provided for the food while in their possession. Food packages are stored in secured areas at each distribution site to safeguard from spoilage, infestation, fire and other losses.

### C. Inventory Practices

It is the Local Agency responsibility to ensure that all operational procedures conform to industry standards and best practices. The State Agency is ultimately responsible for ensuring that all USDA foods are handled properly and directs the Local Agency via policies, procedures, and memoranda. Routine monitoring will be conducted and feedback provided.

### D. Distribution

Each participant is provided a monthly food package at a site that is convenient for them to access. Distribution sites include senior wellness centers and residences, schools, churches and other sites offering services to seniors. The Local Agency ensures that distribution conforms to all local and federal requirements. Policies and procedures related to distribution are found in the DC CSFP Operations Manual.

### E. Food Safety

CSFP food handling and distribution will conform to District of Columbia and federal food safety standards. All Local Agency food safety practices are monitored during routine monitoring visits. See DC CSFP Operations Manual for additional details.

### F. Food Safety Recall Procedures

The State Agency oversees food safety recall procedures statewide and provides updates using the State Emergency Notification System (SENS). SENS is a tool that allows State Agencies to rapidly communicate critical food recall information to Recipient Agencies so they can remove contaminated food from distribution, and keep participants safe.

## Procedures for Food Safety Recalls

When notified of a food recall, the Local Agency shall take, at a minimum, the following steps:

1. Gather and segregate impacted foods in a safe, locked location;
2. Label all food involved in the recall **“FOOD SAFETY RECALL—DO NOT DISTRIBUTE.”**
3. Notify Site Leaders and designated volunteers as soon as notification of affect product is received.
4. Consult with DC Health regarding further instructions on storage and disposal of the affected food items.

### G. Out-of-Condition Foods

The Local Agency follows food handling operating procedures that include proper handling and food rotation. In the event that food becomes out of condition, the Local Agency follows federal and local procedures to move the product out of production. Out of condition foods are not distributed to CSFP participants. Policies and procedures related to out-of-condition foods can be found in the DC CSFP Operations Manual.

## 13. COPIES OF AGREEMENTS

*Reference:* 7 CFR, Part 247.6(11)

*Citation:* Each State agency must enter into an agreement with FNS prior to receiving funds. The state agency must enter into written agreements with local or subdistribution agencies prior to making commodities or administrative funds available to them. Copies of all agreements must be kept on file by the parties to the agreements.

### A. Memorandum of Understanding Between DC Health and DACL

The Memorandum of Understanding (MOU) is the authorizing vehicle for transferring local funding from the DC Department of Aging and Community Living to the DC Department of Health. The MOU, updated annually or as determined in the MOU, is a binding agreement that details responsibilities between the two District agencies.

### B. Agreement between DC Health and Local Agency

The agreement between DC Health and the Local Agency details the responsibilities of both parties and covers a maximum of five fiscal years. Any changes to the agreement affecting assurances will be submitted to USDA for review and approval.

## 14. PROGRAMMATIC ASSURANCES

### A. Management Reviews

*Reference:* 7 CFR 247.34(a), 7 CFR 247.34(b), 7 CFR 250.12(b)

DC Health performs an on-site review of all local agencies and storage facilities at least once every two years. As part of the on-site review, the State agency evaluates all aspects of program administration.

More information can be found in the DC CSFP Operations Manual.

## 15. ATTACHMENTS

Attachment A	DC CSFP Operations Manual
Attachment B	DCCSFP Distribution Sites list
Attachment C	Current Year Income Eligibility Guidelines
Attachment D	Acceptable Sources of Documentation of Age, Income, and Residency
Attachment E	USDA Foods Available List for CSFP
Attachment F	Maximum Monthly Distribution Rates
Attachment G	DC CSFP Caseload Management and Outreach Plan
Attachment H	DC CSFP Nutrition Education Plan



**District of Columbia**  
**Commodity Supplemental Food Program**

**Operations Manual for**  
**Distribution Site Staff and**  
**Volunteers**

**THE COMMODITY SUPPLEMENTAL FOOD PROGRAM (CSFP)**  
**Operations Manual for Distribution Site Staff and Volunteers**

Prepared by:

DC Department of Health

Nutrition and Physical Fitness Bureau

899 North Capitol Street NE

Washington, DC 20002

Last Updated in April 2019

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, audiotope, 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 any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call 866-632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax: 202-690-7442; or (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider

## 1. INTRODUCTION

The CSFP Operations Manual (manual) is intended for participating agencies, staff, and volunteers. It is to be used as a guide to program regulations and requirements as established by the USDA and the District of Columbia. This manual provides an overview of the program, organizational structure, state and local agency responsibilities, key points of contact, program requirements and management. This manual is a supplement to the DC CSFP State Plan.

## 2. PROGRAM OVERVIEW

### **The District of Columbia Department of Health Mission Statement**

The District of Columbia Department of Health (DC Health) promotes health, wellness and equity across the District and protects the safety of residents, visitors, and those doing business in the nation's Capital.

### **Summary of DC Health Services**

The Department of Health provides programs and services with the goal of reducing the burden of disease and improving opportunities for health and well-being for all District residents and visitors. DC Health does this through a number of strategies that center around the following priorities:

1. Promoting a Culture of Health & Wellness;
2. Addressing Social Determinants of Health;
3. Strengthening Public-Private Partnerships;
4. Closing the Chasm between Clinical Medicine and Public Health; and
5. Implementing Data Driven and Outcome Oriented Approaches to Program & Policy Development

### **Health Equity in the District of Columbia**

Health equity is defined by the World Health Organization as the "attainment of the highest level of health for all people." Health inequity is an economic and a social justice reality that exists in the District of Columbia. Health inequities result in lower quality of healthcare, disparate health outcomes for minority racial/ethnic populations and people with low socioeconomic status, increased direct and indirect healthcare costs, and decreased workforce productivity.

In keeping with a Health in All Policies (HiAP) approach, DC Health continues to collaborate with a wide range of partners such as hospitals, community health centers, land use/planning agencies, state and independent advisory bodies, housing agencies, transportation agencies, schools, food agencies, parks and recreation, law enforcement, and the state Medicaid agency to carry out its mission.

### **Commodity Supplemental Food Program in the District of Columbia**

DC Health serves as the State Agency for the administration of the DC Commodity Supplemental Food Program (CSFP) and ensures that the Program complies with all provisions of

7 CFR Part 247 and with the provisions of 7 CFR Part 250 as applicable. CSFP is a comprehensive nutrition and wellness program whose goals align with those of the Age-Friendly DC initiative (AFDC) and the 2019-2022 District of Columbia State Plan on Aging (SPOA). This Operations Manual reflects recommendations made in the 2017 DC Health Systems Plan, the 2018 Health Equity Report, and the State Plan. The State Plan aims to provide an approach focused on closing the food access gap for the aging population in the District ensuring that seniors have access to food and other services that meet their everyday needs. The three major priorities of DC CSFP are:

1. Promote health and wellness among District seniors, targeting underserved geographical areas, homeless residents, and homebound seniors
2. Implement an age-friendly food, nutrition and wellness program, in an equitable, sustainable way
3. Positively impact food security among seniors living in the District

AFDC, guided by the Age-Friendly DC 2023 Strategic Plan, promotes District-wide policies and procedures that make the District an easier place to grow older. Age-Friendly DC is focused on providing community support and health services by ensuring that the District encourages wellness and active aging through the attainment of exceptional health outcomes. The SPOA will evaluate and identify potential areas of improvement in the delivery of services for the aging population by partnering with government agencies and local wellness programming within the District. DC CSFP goals are aligned with the District's goal to promote a stronger sense of physical, mental, and financial security among seniors as they grow older through lifelong health and security initiatives. CSFP, AFDC and SPOA initiatives include current partnerships with the Supplemental Nutrition Assistance Program Education (SNAP-Ed), Senior Wellness Centers, and other government agencies throughout the District.

This Operations Manual shares DC Health priorities related to its senior population, key partnerships critical to helping residents age in place, and strategies for administering the Commodity Supplemental Food Program. The Operations Manual also highlights major program policies and procedures and provides details about how the program is implemented. Lastly, the Operations Manual includes both the Nutrition Education Plan (NEP) and the Caseload Management/Outreach Plan.

The District of Columbia Commodity Supplemental Food Program is administered by the DC Health's Community Health Administration (CHA), specifically the Nutrition and Physical Fitness Bureau (NPFB). Using a collective impact approach, the NPFB coordinates efforts with public and private partners to promote healthy behaviors and environments that improve health outcomes and reduce disparities in the leading causes of mortality and morbidity in the District. CHA and NPFB focus on nutrition and physical fitness promotion; cancer and chronic disease prevention and control; access to quality health care services, particularly medical and dental homes; and the health of families and individuals across the lifespan.

CHA's approach targets behavioral, clinical, and social determinants of health through evidence-based, data-informed programs, policy, and system level interventions. The DC Commodity Supplemental Food Program State Agency (State Agency) aims to address social determinants of health through its work with partners and stakeholders to provide the full range of CSFP services.

CSFP benefits include nutritious supplemental foods, nutrition education and referrals to health care, social service, and other community providers offering services for seniors. Health behaviors, such as food choices, are often shaped by environments and policies that originate outside of the public health sector. Therefore, addressing behavior change requires significant cross-sector collaboration. CSFP participation can also provide opportunities for social interaction, important to overall health and wellness for seniors.

### **Key Partnerships**

The Nutrition and Physical Fitness Bureau continues to rely on multi-sector collaborations with its partners in senior wellness to promote CSFP utilization and to address barriers to program participation. These partners include the DC Department of Aging and Community Living (DAACL), the Department of Parks and Recreation (DPR), the Office of Planning (OP), and the University of the District of Columbia (UDC). Partners in healthcare include AmeriHealth Caritas, Unity Health Care, Community of Hope and Medical Home Comprehensive Care. Non-governmental community partners include the Capital Area Food Bank, Martha's Table, Share Our Strength, Food and Friends, DC Central Kitchen, DC Hunger Solutions, DC Greens, the American Heart Association, and the DC Farmers' Market Collaborative.

These partners have joined DC Health in its efforts to improve healthful food access to all residents, particularly seniors. They collaborate closely with the NPFB on its locally funded Healthy Food Access Initiatives (HFAI) including the Produce Plus Program (PPP), Produce Prescription (PRx), Healthy Corners Stores Partnerships, home delivered meals for chronically ill residents, and the Joyful Food Markets (JFM).

**Produce Plus Program**, funded through the District's Budget Support Act (BSA), allows residents to purchase locally grown fresh fruits, vegetables, and herbs. The program supports local farmers who provide healthier fruit and vegetable options for DC residents. Produce Plus runs from June 1<sup>st</sup> through September 30<sup>th</sup> of each year. The Program reaches approximately 10,000 District residents, predominantly seniors, annually.

**Produce Prescription** (formerly known as Fruit and Vegetable Prescription FVRx), a component of the Produce Plus Program, is a partnership between Unity Health Care, Inc., Community of Hope, Medical Home Comprehensive Care, AmeriHealth Caritas, DC Greens, and DC Health. Patients enrolled in various nutrition and health programs at participating health care facilities are prescribed healthful fruits and vegetables as part of their medical intervention. Short-term benefits include improved medical appointment compliance and increased farmers' market utilization. Long-term benefits of the program are currently being assessed.

**Healthy Corners Stores Partnership** is a project begun by DC Central Kitchen that supports healthful food options at the retail level. Residents are offered checks for healthful foods that are redeemed in markets that have partnered with DC Health. These markets coordinate health education sessions and food demonstrations, for participants. The Program reaches approximately 825 District residents annually.

**Home Delivered Meals** for the chronically ill are provided to District residents through an award made to Food and Friends. Food and Friends employs health care and food service professionals to offer a full spectrum of nutrition services including food that helps relieve the healthcare burdens associated with being chronically ill and home bound. The Program reaches approximately 500 District residents annually.

**Joyful Food Markets**, funded through the District's Budget Support Act (BSA), are set up monthly at schools located in Wards 5, 7, and 8. Students receive up to 23 pounds of healthful foods along with targeted health and wellness education. JFM is noted here because of the role that seniors as grandparents play in the family setting.

### 3. ORGANIZATIONAL STRUCTURE

*Reference:* 7 CFR §247.3(a)

*Citation:* CSFP is administered at the Federal level by the Department's Food and Nutrition Service (FNS) which provides commodities, assigns caseload, and allocates administrative funds to State agencies. State agencies are responsible for administering the program at the state level. The State agency may select local agencies to administer the program in local areas of the state. The State agency must provide guidance to local agencies on all aspects of program operations. The state agency may also select subdistribution agencies to distribute or store commodities or to perform other program functions on behalf of the State agency. Local or subdistribution agencies may also elect other agencies to perform specific program functions with the state agency's approval. Although the State agency may select other organizations to perform specific activities, the State agency is ultimately responsible for all aspects of program administration.

DC Health is the administering agency that operates the Commodity Supplemental Food Program (CSFP) in the District of Columbia. The Capital Area Food Bank (CAFB), a local nonprofit organization, is the Local Agency (LA) authorized to provide CSFP services on behalf of the District of Columbia. Contact information for both organizations are listed below:

#### A. State Agency Contact

Amelia Peterson-Kosecki, Bureau Chief  
State Agency CSFP Director  
DC Department of Health  
899 North Capitol Street, NE  
Community Health Administration, 3rd Floor  
Washington, DC 20002  
Phone: (202) 442-9140  
Website: <https://doh.dc.gov/>

Karen Franco  
State Agency CSFP Program Coordinator  
DC Department of Health  
899 North Capitol Street, NE  
Community Health Administration, 3<sup>rd</sup> Floor  
Washington, DC 20002  
Phone: (202) 442-5891  
Website: <https://doh.dc.gov/>

## B. Local Agency Contact

Marian Peele, Director, Grocery Plus (CSFP and SFMNP)  
Capital Area Food Bank (CAFB)  
4900 Puerto Rico Avenue, NE  
Washington, DC 20017  
Phone: (202) 644-9800  
Website: <https://www.capitalareafoodbank.org/>

## C. Distribution Locations

DC CSFP distribution takes place at over 71 locations in all eight wards of the city. The main distribution site, East Capital Street Walk-in Center, is open Monday through Friday at 5601 East Capital Street, SE Washington, DC 20019.

See **Attachment A: DC CSFP Distribution Sites** for a complete list of distribution sites. All distribution sites are under the jurisdiction of the Local Agency.

# 4. PROGRAM MANAGEMENT AND ADMINISTRATION

## A. State and Local Agency Responsibilities

*Reference:* 7 CFR §247.5

*Citation:* *The State agency may delegate some responsibilities to another agency; however, the State agency is ultimately responsible for all aspects of program administration.*

The **State Agency: DC Health** shall be responsible for the following:

1. Implementing a State Plan that lists state level priorities and details how federal and local CSFP requirements will be met.
2. Providing guidance and technical assistance to the Local Agency by way of State Plans, an operations manual, CFR and memoranda
3. Selecting local agencies to administer the program throughout the state;
4. Managing caseload through a variety of practice and evidencebased strategies.
5. Establishing a financial management system that accurately tracks funds received for program administration;
6. Enforcing inventory protection requirements for the determination of insurance as clarified in FNS Policy FD-139 *Clarification on Inventory Protection Requirements*;
7. Establishing eligibility guidelines in accordance with Federal regulations;
8. Establishing procedures to monitor for dual participation;
9. Providing participants with nutrition education and information regarding other public health assistance programs;
10. Establishing appeal and fair hearings procedures for local agencies and program participants;
11. Establishing standards for the pursuit of claims against participants;
12. Ensuring that program participation does not exceed the monthly caseload allocation;
13. Participating in USDA/FNS training regarding proper ordering processes;

14. Conducting announced or unannounced visits to the Local Agency and distribution sites to monitor for adherence to program regulations;
15. Conducting biennial (every two years) administrative reviews of Local Agency programmatic activities including competency based training, caseload management, participant certification and notification procedures, nutrition education, outreach, recordkeeping and civil rights compliance.
16. Conducting biennial (every two years) reviews of Local Agency USDA Foods management procedures including ordering, inventory, food safety and insurance.

The **Local Agency: Capital Area Food Bank** shall be responsible for the following:

1. Conducting the full range of certification and distribution services as outlined in regulations, policies and procedures, and memoranda.
2. Determining an applicant's eligibility in accordance with Federal regulations;
3. Ensuring that participation does not exceed monthly caseload;
4. Providing culturally and linguistically appropriate nutrition education and information regarding other public health assistance programs;
5. Conducting the full range of responsibilities related to USDA Foods ordering, receiving, storing, food safety insurance, and distribution.
6. Safeguarding CSFP commodities from theft, spoilage, damage, destruction or other loss;
7. Conducting physical inventories of product received from the USDA and maintaining inventories as required by CSFP regulations;
8. Maintaining warehouseman's legal liability insurance in an amount adequate to cover any losses arising from its failure to exercise reasonable care and responsibility required by law and imposed by contract including but, not limited to, spoilage and failure to rotate stock – per FNS Policy FD-139 *Clarification on Inventory Protection Requirements*;
9. Conducting physical inventories of product received from the USDA and maintaining inventories as required by CSFP regulations.
10. Meeting all reporting requirements.

## 5. PARTICIPANT ELIGIBILITY REQUIREMENTS

*Reference:* 7 CFR §247.5

*Citation:* *The State agency may delegate some responsibilities to another agency; however, the State agency is ultimately responsible for all aspects of program administration.*

### A. Age

As of November 3, 2017, the DC CSFP is only serving eligible seniors. Senior citizens enrolled to participate in the DC Commodity Supplemental Food Program shall be not less than 60 years of age.

### B. Food Program Income Guidelines

Program regulations at 7 CFR Part 247.9(c) require that elderly persons have household income at or below 130 percent of the Poverty Guidelines to be eligible for CSFP. **See Attachment B:** Current Year Income Guidelines.

C. Residency

Reference: 7 CFR §247.9(a)

Senior citizens enrolled to participant in the DC Commodity Supplemental Food Program shall be residents of the District of Columbia.

D. Documentation of Age, Income, and Residency

All residents applying for DC CSFP provide proof of age, income\*\*, and residency by presenting at least one of the following documents in each category. To decrease the burden associated with program participation, the District allows applicants to self-declare income\*\*. See Attachment C: Acceptable Sources of Documentation of Age, Income, and Residency for a more exhaustive list.

Proof of Age	Proof of Income**	Proof of Residency
Driver's License(valid)	Social Security Payments	Bill with current address (medical, cable, credit card, utility bill)
Birth Certificate	Pensions/Veteran's Payments	Bank account statement
Passport/Visa	Earning Statement	Current paystub
State ID	SNAP household certificate	Current SSI check

E. Nutritional Risk Criteria

Reference: 7 CFR §247.6(3)

The DC CSFP does not evaluate nutrition risk as a criterion for CSFP.

F. Reports and Recordkeeping

Reference: 7 CFR §247.29

Citation: The State Agency is responsible for maintaining accurate and complete records for all aspects of the CSFP. Monthly reports must be completed and submitted to the USDA within specified time frames.

The State Agency and Local Agency shall maintain accurate and complete financial and administrative records pertaining to all CSFP functions for three years from the close of the fiscal year to which they pertain, or longer, if the records are related to unresolved claims, actions, audits, or investigations.

DC Health is required to submit the following reports to USDA within specified time frames:

1. Monthly CSFP Report and Quarterly Administrative Financial Status Report (FNS-153);
2. Annual Financial Status Report (SF-425);
3. Annual Racial/Ethnic Group Participation Report(FNS-191).

## 6. DISTRIBUTION SITE REQUIREMENTS

Reference: §247.10

Citation: *The requirements for distributing commodities to eligible CSFP participants and the methods used to accomplish this task.*

### A. Distribution Site Agreements

Local Agency CSFP staff are responsible for identifying and entering into annual agreements with all community and residential sites. The Local Agency provides the names, addresses, and distribution information for each site to DC Health. New sites are recruited based on program need, volunteer capacity, accessibility to participants, and accessibility for deliveries of food boxes. All new sites are required to comply with A, B, C, D, E, and F of this section.

Each distribution site receiving commodities for distribution is responsible for any loss resulting from improper distribution, or improper storage, care, or handling of commodities. Each agency receiving program funds is responsible for any misuse of program funds.

### B. Distribution and Use of CSFP Commodities

The monthly CSFP food package (box) shall be pre-determined according to established FNS food packaging guidelines. The Local Agency shall ensure that the distribution sites distribute only one box of commodities to each participant on a monthly basis.

Participants shall receive the food box by self-pick-up or home delivery. All participants or their proxies shall present valid identification before receiving their box.

In order to make CSFP accessible to eligible individuals who are physically unable to pick up their benefits, distribution sites shall be required to promote the use of proxies or arrange home delivery to the extent that resources permit.

See **Attachments D and E**: USDA Foods Available List (D) and CSFP Maximum Monthly Distribution Rates (E)

### C. Waitlists

DC CSFP will serve up to the maximum assigned caseload. Once the assigned maximum CSFP caseload has been reached, additional applicants shall be placed on a waiting list. The waiting list shall include the name, address, and telephone number of the applicant, as well as the date of the initial application, and the date the applicant was notified of waiting list status. The Local Agency shall notify eligible applicants within 10 calendar days of their request for benefits. The Local Agency shall maintain the waiting list. When caseload space becomes available, the Local Agency shall contact eligible applicants in priority order based on date of application.

## D. Civil Rights

Reference: §247.37 (a)

Citation: *State and local agencies must comply with the requirements of Title VI of the Civil Right Act of 1964, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975; and titles II and III of the Americans with Disabilities Act of 1990. State and local agencies must also comply with the Department's regulations on non-discrimination and with the provisions of FNS Instruction 113-21, and the 7CFR Part 15 including racial and ethnic participation data and public notification of non-discrimination policy.*

The certification form shall include a section where the applicant can indicate a self - identified racial/ethnic category which shall be kept on file for all participants.

The Local Agency shall display USDA "And Justice for All" posters, or a USDA approved substitute, in Local Agency distribution sites. The Local Agency shall supply USDA "And Justice for All" posters or a USDA-approved substitute at CSFP nutrition education activity sites or food warehouses. Nondiscrimination statements and civil rights complaint procedures shall be included in any CSFP vendor contracts, brochures, newsletters, posters, media announcements, and application or certification forms to be signed by participants. Where a significant portion of CSFP-eligible population is comprised of non-English speaking or Limited-English speaking persons, the Local Agency shall ensure that program information is made available in the appropriate language, either orally or in writing.

The Local Agency shall ensure that individuals associated with CSFP operations are informed regarding civil rights procedures. Any complaint received by the Local Agency, State Agency, or distributing agencies alleging discrimination based on race, color, national origin, age, sex, or disability shall be documented and reported immediately to the FNS Civil Rights Division at the Mid-Atlantic Regional Office within five (5) calendar days of receipt.

Civil rights activities of participating agencies shall be reviewed at least once a year by the Local Agency as part of the CSFP management review process. This review shall include confirmation that "And Justice for ALL" posters are displayed, and that the civil rights policy and discrimination complaint process appears in any public announcements, newsletters, posters, brochures, or other media used to provide CSFP information to the public.

Where applicable, the civil rights compliance review, and all CSFP program reviews, shall determine if appropriate bilingual staff, volunteers or other translation resources are available to serve applicants and participants, and that rights and responsibilities on the certification form are read to or by applicants and participants in the appropriate language. The State Agency shall review racial/ethnic enrollment data, denied applications, waiting lists, complaint reports and participant surveys to ensure that their intake staff operates in a nondiscriminatory manner. The State Agency has the right to investigate or review the Local Agency documentation upon request to determine if it is meeting the requirements of the CSFP and the State Plan.

Program participants may address a complaint concerning program operations and program staff to the Local Agency, in person, in writing, or by telephone. Contact

numbers shall be included on program information distributed to participants upon enrollment and re-certification. In addition, the USDA toll-free number shall be provided to participants should they wish to make a direct complaint. Individuals shall be advised of any actions that may be taken to resolve the stated problems.

Complaint forms shall be available on request. Oral complaints shall be accepted and shall be recorded on the complaint forms by the CSFP organization receiving the complaint. All complaints shall be forwarded to the FNS Civil Rights Division at the Mid-Atlantic Regional Office within five (5) calendar days of receipt.

#### E. Civil Rights Pre-Award Review

Distribution sites must undergo a pre-award civil rights review to qualify as a distribution site in the CSFP. The distribution site shall submit a written assurance that the program or facility shall operate in compliance with all civil rights laws implementing nondiscrimination regulations. CSFP staff shall conduct a pre-award review of all potential distribution organizations to ensure compliance with USDA civil rights laws, regulations, and guidance. The Local Agency shall submit the pre-award desk review to the State Agency for review and approval before the first distribution using the questionnaire provided by FNS.

#### F. Civil Rights Training

All CSFP staff are required to attend a mandatory USDA civil rights training before distributing food to any participant. The State Agency is responsible for training sub-recipient agencies on an annual basis. The CAFB is responsible for training their local sites, including front-line staff who interact with applicants or participants on an annual basis.

New employees and volunteers shall receive civil rights training before participating in CSFP activities. All trainings shall be documented with an agenda, copies of handouts and a dated sign-in sheet with printed (hand written or computer generated) names and signatures.

#### G. USDA Non-Discrimination Statement

All CSFP State, Local, and distribution locations shall post the following statement: In accordance with Federal civil rights laws 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 the USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, 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](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) Mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) Fax: (202) 690-7442; or
- (3) Email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

#### H. Internal Revenue Service (IRS) Nonprofit Status Verification

In accordance with FNS Policy Memorandum FD-118 (FD-118), nonprofit agencies shall have a tax-exempt status under the Internal Revenue Service Code (IRC). The State Agency shall check the non-profit status of the Local Agency no less than annually to ensure that the Local Agency remains eligible to participate in the CSFP.

The Local Agency is required to complete the Tax Exempt Verification check and complete the Tax Exempt Verification Sheet annually by August 1<sup>st</sup> for all nonprofit organizations or before they begin distributing food in the CSFP. As new stations come online, the Local Agency is required to update the verification sheet, attach documentation of the sub-distributing organization's tax-exempt status, and submit documentation to the State Agency for review and approval by September 15<sup>th</sup> of each year.

If any nonprofit organizations are found to be ineligible, the Local Agency shall notify the State Agency and follow the instructions in FD-118.

#### I. Operating Hours for CSFP

CSFP certification and distribution shall take place at the East Capitol Walk-In Center and all community and residential distribution sites. The East Capitol Walk-In Center shall operate from 8:30 a.m. - 12:00 p.m. on Mondays, and 8:30 a.m. – 4:00 p.m. Tuesday through Friday. The Capital Area Food Bank (CAFB) location\*\* is the main location for CAFB CSFP staff that support and monitor the walk-in center and community and residential sites. The site also houses the CSFP inventory.

\*\*Capital Area Food Bank  
4900 Puerto Rico Ave NE  
Washington, DC 20017

Community and residential sites operate CSFP on a part-time basis and shall establish regular hours of operation. Sites are required to submit requests to change distribution dates and times at least 15 business days in advance of the change. This will allow sufficient time to notify participants of the pending change. Sites requesting to make changes will need to submit documentation of how and when current participants will be notified. The Local Agency may add new sites throughout the operational year at the discretion of the Local Agency based on a needs assessment (NA) and available funding. The Local Agency shall provide details of the NA to the SA upon request.

#### J. [Timely Submission of Applications](#)

Distribution site coordinators shall submit all CSFP enrollment applications to the Local Agency upon receipt to allow for a determination of eligibility to be made within 10 calendar days of the date of the application. The Local Agency shall follow all applicable CSFP regulations regarding notification of ineligibility and wait listing.

#### K. [Beneficiaries Receiving TEFAP and CSFP Benefits from Religious Organizations](#)

In reference to FNS Policy FD-138, beneficiaries receiving benefits from religious organizations shall be informed of their rights to referrals to receive benefits at non-faith based sites. The Local Agency shall be responsible for ensuring that notification is provided at the time of certification and then on an ongoing basis.

## 7. [PARTICIPANT CERTIFICATION](#)

*Reference:* §247.8 - 247.9, 247.13, 247.15

*Citation:* *Eligibility for CSFP participation will be determined based on Federal regulations governing the Program and upon completion of a certification form developed by the State agency and approved by Food Nutrition Service Regional Office (FNSRO).*

#### A. [Annual Certification](#)

Currently, eligible senior citizens are certified annually in May. Based on guidelines issued in 2019, to be implemented in Fiscal Year 2020, the DC CSFP certification period will be extended to three years. Applicants shall meet all eligibility criteria at the time of certification before benefits can be issued. During certification, Local Agency staff shall inform the applicant that the CSFP applies program standards without discrimination by race, color, national origin, age, sex, or disability.

Applicants and recertifying participants shall be advised verbally and in writing by Local Agency staff of their rights, obligations and the fair hearings process. Participants are required to sign the application/certification form confirming that they been advised.

The Local Agency is responsible for documenting all applications received as having been reviewed, the date reviewed and whether the applicant was approved, denied, or waitlisted. CSFP distribution staff shall submit all applications to the Local Agency within three (3) calendar days of receipt of the application. CSFP staff enter application information into the management information system database, and the individuals are designated as either a participant or a participant-waitlisted, depending on availability of the case load at the site in which they enrolled.

Once the information is completed and confirmed, a determination of eligibility is made

based on the criteria provided and in compliance with CSFP regulations. Patrons (applicants) are notified of eligibility/ineligibility within 10 calendar days of the date of application. Applicants determined to be ineligible are notified in writing. The notice of ineligibility statement shall inform the applicant of his/her right to a fair hearing to appeal the decision.

Certification periods may not exceed three years in length. However, the Local Agency will perform a yearly review to evaluate if the participant:

1. Has an unchanged address,
2. Still wishes to take part in the program

#### B. Notification of the Expiration of Certification Period

The Local Agency shall notify participants in writing at least fifteen (15) calendar days before the expiration date that eligibility for CSFP is about to expire. The notification of expiration shall include the required statement that informs the participant that CSFP applies program standards without discrimination by race, color, national origin, age, sex, or disability. Additionally, the notification will advise of steps that the senior can take to recertify.

#### C. Certification When a Participant Moves from One CSFP Site to Another

Local Agency staff follow the verification of certification procedure when certifying participants who move from one CSFP area to another. This includes verifying that the certification has not expired (per 7 CFR 247.16(c)). In the instance that the participant is moving in state, the Local Agency team will follow protocols that involve transferring information from one site to another. In the instance that the participant is moving out of state or is moving in state from another jurisdiction, the Local Agency will make every effort to contact the jurisdiction and verify the certification and secure the required information.

Transferring participants are given the opportunity to continue to receive CSFP benefits for the duration of the certification period based on the following process:

- A. The distribution site that determined the participant's eligibility must provide verification of the expiration date of the certification period to the participant upon request.
- B. If the Local Agency has a waiting list, the participant shall be placed on the distribution site waiting list ahead of all other waiting applicants.

#### D. Eligibility Determination

CSFP staff shall notify applicants in writing of the results of the eligibility determination within ten (10) calendar days from the receipt of their application by the Local Agency. If the applicant is eligible, and the application is received close to the site's next distribution date, staff are permitted to notify the participant via phone call, email or text.

If the applicant is ineligible, the notification shall identify the eligibility requirement(s) that the applicant did not meet. The notification also informs the applicant of his/her right to a fair hearing to appeal the ineligibility determination. The Local Agency shall provide every ineligible applicant with referral information on how to access other local food assistance resources.

#### E. The Use of Proxies

CSFP participants may designate up to two proxies on their CSFP enrollment form to collect their CSFP box in their absence. Each proxy's name shall appear on the monthly roster next to the participant's name indicating that they may collect the CSFP box. Proxies shall give the name of the participants they are picking up the CSFP box for, and provide a valid photo ID. If a participant did not designate a proxy on their enrollment form, a temporary proxy may collect the CSFP box if the proxy provides their valid photo ID and the valid photo ID of the CSFP participant. A participant may change or update their designated proxy by speaking with a CSFP staff member, who shall document the change in proxy.

CSFP staff shall inform all proxies that Federal regulations require that CSFP food be used by the participant only and may not be sold, traded or used by another.

#### F. Standards to Determine the Cost-Effectiveness of a Claim against a Participant

The State Agency has established the following cost effective standard:

The pursuit of a claim against a participant to recover the value of CSFP commodities improperly received or used is cost effective when the participant has violated the policy for six months or longer (the certification period) or exceeded \$300, which is the average retail value per month over a six-month period of a food package. The Local Agency is required to use this standard in determining if a claim is to be pursued and to pursue claims in accordance with 7 CFR, Part 247.30 and applicable State Agency policies and procedures.

The dollar amount not to be exceeded will be evaluated once every three years.

## 8. CASELOAD MANAGEMENT AND OUTREACH PLAN

*Reference:* §247.6 (c)(5)

*Citation:* *Develop and implement a process by which the State and local agencies partner with organizations within the community to educate the targeted population about the CSFP.*

Outreach, community engagement, the use of waiting lists and proxies, along with strategic partnership building form a cornerstone of DC CSFP caseload management planning. It is a way of conducting business to ensure that eligible seniors, their families, along with public and private partners are made aware of, understand, and have a working knowledge of CSFP and the benefits of participation. Intentional, results based, outreach driven data and evidence based strategies will ensure that program resources are equitable, accessible, and utilized to fully serve the annual authorized caseload.

The State Agency and Local Agency partners continue to elderly populations primarily with the help of the DC Department of Aging and Community Living (DACL) Senior Service Network and other partner organizations in the District to educate seniors about its nutrition programs including the Commodity Supplemental Food Program.

Monthly monitoring of site participation and other performance indicators will occur in order to inform and implement approved caseload management strategies, particularly when participation falls below 98%. The State Agency will solicit and evaluate annual feedback to evaluate CSFP menu, hours of operation, distribution location, and customer service.

#### A. Outreach Strategies for Home Bound Seniors

The CSFP State Agency will work with all of its partners to identify seniors that are eligible for the home delivery program. This will consist of targeting current home bound seniors in the District, maintaining active partnerships with community-based organizations, and establishing a referral network throughout the District. Local Agency partners will prioritize home bound senior CSFP delivery as part of its caseload management strategy.

See **Attachment F**: District of Columbia CSFP Caseload Management and Outreach Plan.

### 9. DUAL PARTICIPATION PREVENTION

*Reference:* §247.19

*Citation:* *The State agency and local agencies are responsible for monitoring CSFP to prevent dual participation.*

#### A. Detecting Dual Participation at Enrollment

Dual participation is strictly prohibited. The State Agency has the responsibility to monitor Local Agency efforts to prevent dual participation. The Local Agency is responsible for ensuring that all applicants and participants are aware that dual participation is prohibited and for providing written materials advising of the penalty for doing so.

The Local Agency is required to use an automated management information system(s) (MIS) to manage relevant aspects of CSFP including participation and to take appropriate action when dual participation is discovered. That action will include advising the participant of the violation and imposing the appropriate penalty.

The Local Agency will review its participant records on a quarterly basis and provide a report to the State Agency of its findings related to dual participation and any action taken.

#### B. Detecting Dual Participation during Distribution

The Local Agency is required to implement procedures to prevent and detect dual participation. This includes implementing standard operating procedures during food package distribution. Steps to reduce dual participation include requiring identification from the participant or proxy during every pickup and securing a signature for each package distributed.

CSFP staff shall advise participants at all distribution events that they may not receive more than one CSFP food package (box) per month and may not register at more than one distribution site.

#### C. Methods Used to Inform Applicants of the Illegality of Dual Participation

During the certification, re-certification and distribution processes, participants and proxies receive verbal and written notification of prohibitions on dual participation. Participants and applicants receive written notification and are verbally advised of the illegality of dual participation when they pick up CSFP food packages (boxes).

## 10. NOTIFICATION OF DISCONTINUANCE OF PARTICIPATION

Reference: §247.12, 247.17

Citation: *The local agency is responsible for notifying an applicant/participant when benefits are denied or discontinued due to fraudulence, ineligibility, or lack of commodities.*

When presented with evidence that a participant is no longer eligible for CSFP benefits or if there is evidence that the applicant, participant, caretaker, or proxy fraudulently applied for or received program benefits, the participant may be disqualified from the CSFP for a period of up to one year unless the Local Agency determines the disqualification would result in a serious health risk. When being notified of discontinuance, participants shall receive:

1. a written notification of discontinuance of participation
2. notification of their right to receive a fair hearing to appeal a disqualification determination

The notice shall inform the participant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability.

If a participant is no longer eligible to receive CSFP commodities, the Local Agency shall provide the participant with written notification of discontinuance at least 15 calendar days before the effective date of discontinuance. The written statement shall also contain information on the participant's right to a fair hearing to appeal this decision.

The Local Agency will review its participant records on a quarterly basis and provide a report to the State Agency listing all participants served with a notification of discontinuance of participation.

## 11. PARTICIPANT RIGHTS & RESPONSIBILITIES

### A. USDA Participants Rights and Responsibilities

Each individual who completes a CSFP application shall receive a document that details, at a minimum, the United States Department of Agriculture (USDA) Participant's Rights and Responsibilities, CSFP program rules, and information regarding current waitlists and fair hearings. Site leaders shall provide this information orally if needed or requested.

Participants are to be advised that:

1. Federal regulations require that CSFP foods be used by the participant only and may not be sold, traded or used by another person.
2. Participants cannot receive more than one box each month. They also cannot sell commodities or exchange them for other food. Doing so could result in disqualification from the program or a claim brought against him/her for the cost of the products.
3. Participants shall report changes to household size and/or income within 10 calendar days of the change occurring.
4. Participants shall enroll in the CSFP by completing an application, and verifying continued interest in the program every year. Participants are required to recertify

every three years. Failing to complete an application or to recertify is cause for removal from the program.

5. Participants shall present a valid ID and sign the roster each month when picking-up CSFP benefits.
6. Participants may be removed from the CSFP for threatening or engaging in verbal or physical abuse.

Additional responsibilities for CSFP staff:

7. CSFP staff shall notify applicants in writing if CSFP determines that an applicant is ineligible, and when an applicant is terminated from the program. If this happens, applicants are advised in writing that they have the right to appeal this decision and request a fair hearing.
8. CSFP staff provides written nutrition education materials every month along with referral information about additional community resources.

## B. Fair Hearings

*Reference:* §247.33

*Citation:* *A process by which CSFP applicants/participants can appeal an adverse action which results in the denial or loss of benefits.*

Individuals seeking continued benefits may request a fair hearing within 60 calendar days of the date of the notice of termination. Any participant denied benefits at recertification time or found ineligible during the recertification period and who requests a fair hearing within 15 calendar days of notice of termination shall continue to receive benefits until a hearing official reaches a decision or the certification period expires, whichever comes first. An applicant who is denied benefits at the time of certification shall not receive benefits before a hearing official makes a determination.

Conduct for the fair hearing, including all notifications is the responsibility of the Local Agency. The Local Agency shall establish clear, simple rules and procedures regarding the fair hearings process. The Local Agency shall notify CSFP participants/applicants of denial of benefits in writing. The letter shall outline information needed for a fair hearing and define the rights and responsibilities of all parties involved. All fair hearings shall be conducted by an impartial official who does not have any personal stake or involvement in the decision and who was not directly involved with the initial determination.

The Hearing Officer shall:

1. Ensure that hearings are scheduled within three weeks of the date the initial request is received in the district office;
2. Provide written notice of the place and time of the hearing at least 10 calendar days before the hearing date and include the rules of procedure for the hearing;
3. Ensure all relevant issues are considered;
4. Administer oaths of affirmations as required by the State;
5. Request and receive all evidence determined necessary for the hearing;
6. Regulate the conduct and course of the hearing consistent with due process;

7. Order, where relevant and necessary, an independent medical assessment or professional evaluation from a source mutually satisfactory to the appellant and OMB;
8. Render a decision which shall resolve the dispute within 45 calendar days of the initial request for a hearing.
9. Once a decision has been reached, written notification shall be sent to the individual explaining the reasons for the decision. If the Hearing Officer rules in favor of the participant, then benefits shall continue as scheduled. If the hearing decision is in favor of an applicant who was denied benefits, receipt of commodities shall begin within 45 calendar days from the date that the hearing was requested as long as the applicant is still eligible. If the hearing decision is against the participant, benefits shall be discontinued immediately and not later than the next scheduled distribution date.

A request for a fair hearing may be denied for the following reasons:

1. The request is not received within 60 calendar days from the date the Local Agency office mails or gives the participant/applicant the notice of adverse action;
2. The request is withdrawn by the appellant or representative in writing;
3. The appellant fails to appear at the hearing without good cause.

#### C. Standards to Determine the Cost-Effectiveness of a Claim Against a Participant

The State Agency has established the following cost effective standard:

The pursuit of a claim against a participant to recover the value of CSFP commodities improperly received or used is cost effective when the participant has violated policy for six months or longer (the certification period) or exceeded \$300, which is the average retail value per month over a six-month period of a food package (box). The Local Agency is required to use this standard in determining if a claim is to be pursued and to pursue claims in accordance with 7 CFR, Part 247.30 and applicable State Agency policies and procedures.

The Local Agency will review records related to claims against participant provide a report to the State Agency noting any action taken.

## 12. CASE LOAD JUSTIFICATION INCREASE

*Reference:* §247.6(c)(4)

The District of Columbia Department of Health submits its request for a caseload increase based on need. Requests will include a needs assessment, a case management and outreach plan update, and performance on key indicators.

The State Agency and the Local Agency work together to implement program changes and enhancements to increase participation by:

1. Using data informed and evidence based strategies;
2. Performing direct outreach activities at distribution sites with declining participant loads;

3. Leveraging the waiting list and proxy policies to accommodate participant demand; and
4. Integrating the program into existing, recognized community hubs including parks and recreation centers, senior wellness centers and senior congregate meal locations.

Annually, the State Agency shall at a minimum:

1. Review the LA caseload management achievements
2. Conduct site visits at Local Agency certification and distribution sites to provide program oversight;
3. Monitor assigned caseloads and participant retention rate on a monthly basis; and
4. Assist the Local Agency with implementing the DC CSFP Caseload Management and Outreach Plan.

See the Caseload Management and Outreach plan for more details.

### 13. NUTRITION EDUCATION PLAN

*Reference:* §247.18

*Citation:* *The State agency shall create and implement a nutrition education plan in accordance with CSFP regulations. Evaluation procedures shall be established to allow participants to provide feedback as to the effectiveness of the plan.*

#### A. Nutrition Education Definition

Nutrition Education is any combination of educational strategies, accompanied by environmental supports, designed to facilitate voluntary adoption of food choices and other food and nutrition related behaviors conducive to health and well-being. Nutrition education is delivered through multiple venues and involves activities at the individual, community, and policy levels. CSFP nutrition education should be culturally sensitive and delivered by qualified nutrition educators.

#### B. Nutrition Education Plan

The CSFP Nutrition Education Plan for the District of Columbia includes delivery of evidence-based, behavior focused curricula and activities that promote healthy eating and active lifestyles. CSFP participants will take part in individual and group based direct education targeted to their specific ethnic and cultural characteristics. Nutrition education will be delivered by competent staff and volunteers from the Local Agency, the DC SNAP-Ed Program, and other providers. The State Agency CSFP Director is responsible for providing guidance and facilitating training needed by Local Agency nutrition staff to deliver effective evidence-based nutrition education services to CSFP participants and will coordinate with DC Health nutrition educators.

Group education classes will be supported with complementary educational tools including SNAP-Ed approved handouts and recipes that feature key health messages based on the Dietary Guidelines for Americans and targeted to the senior population.

See **Attachment H: DC CSFP Nutrition Education Plan**

## 14. SYSTEM FOR STORING AND DISTRIBUTING COMMODITIES

Reference: §247.6(c)(6); §250.12; and §250.14;

### A. Receiving

USDA Foods are shipped directly to the Local Agency warehouse from the multi-food warehouse and commercial food manufacturers under USDA contract. The State Agency approves all direct shipment requests submitted by the Local Agency into the Web-Based Supply Chain Management System (WBSCM) and monitors all multi-food shipment requests placed into WBSCM by the Local Agency. The Local Agency is responsible for the receipt and storage of commodities, keeping an accurate and up to date inventory of all foods, the preparation and distribution/delivery of the food packages, and maintaining food safety standards at all times.

The Local Agency inventories USDA Foods received, and compares shipments received to the Bill of Landing. Differences in the product count or products listed are edited on the Bill of Landing and certified with a signature on the Bill of Landing. Staff enter inventory data into the Local Agency inventory management information system and the product is assigned a barcode that corresponds to its storage place in the Local Agency Distribution Center. Staff document noticeable damage to the container when products are received. For reporting purposes, products are calculated out to the unit dependent on their packaging within a case.

### B. Packaging

Distribution sites, under agreement with the Local Agency, assure that adequate care and security is provided for the food while in their possession. Food packages are stored in secured areas at each distribution site to safeguard from spoilage, infestation, fire and other losses. These storage areas may also be used to store the Emergency Food Assistance Program (TEFAP).

Staff pull inventory monthly to pack CSFP food packages (boxes). During pulling procedures, precautions are taken to prevent damage to the product. In the event damage occurs, damaged products are properly noted and reported to the State Agency. In addition, notations are made in the inventory list.

Staff cross check inventory during packing. Staff subtract the packed inventory from the original inventory verified at the beginning of the month. After food packages (boxes) are packed, the remaining inventory is counted and recorded. At this time, the total number of food packages and damaged products are counted and recorded. Staff cross-check these numbers with the original inventory pulled for the day. Any discrepancies result in a recount and investigation of numbers that do not match. Staff enter reconciled records into a management information system.

### C. Inventory Practices

It is the Local Agency responsibility to ensure that all operational procedures conform to industry standards and best practices. The State Agency is ultimately responsible for ensuring that all USDA foods are handled properly and directs the Local Agency via

policies, procedures, and memoranda. Routine monitoring will be conducted and feedback provided.

Local Agency's CSFP Operations Manager and Inventory Coordinator perform random cycle counts after each packing session, and a full inventory count occurs at the end of each month. During the warehouse inventory, every commodity is counted by its case and properly calculated out to its unit number. Damaged items are counted and set aside and reported to the State Agency. Staff compare inventory with previous records and inventory for the prior month.

Staff take a complete inventory of CSFP products in the Distribution Center after pulling inventory for packing sessions. Staff compare physical counts with electronic records. Staff resolve all inventory discrepancies through recounting and investigation. Staff document justifications for adjustment in the inventories on the inventory records.

Local Agency staff maintain accurate and complete records on site for three years from the close of the fiscal year to which they pertain, or longer if the records are related to unresolved claims, actions, audits, or investigations.

#### D. Distribution

Each participant is provided a monthly food package at a site that is convenient for them to access. Distribution sites include senior wellness centers and residences, schools, churches and other sites offering services to seniors. The Local Agency ensures that distribution conforms to all local and federal requirements.

The Local Agency will provide monthly reports to the State Agency detailing at a minimum, the following related to distribution:

- A. List of food items in the monthly package,
- B. Distribution location and dates,
- C. Any changes in distribution deliveries, dates, and distribution times, and
- D. Any new distribution sites

#### E. Food Safety

The CSFP staff and distribution sites conform to District of Columbia and federal health standards. CSFP staff comply with the following general rules regarding food safety:

1. Staff use the first-in-first-out (FIFO) system of inventory management.
2. Staff adhere to the manufacturer's "expiration" or "use-by" dates, along with FIFO, in management of food inventories.
3. Staff mark donated food cases and containers with the date of their receipt at the storage facility.
4. USDA donated foods that show signs of spoilage, infestation, or other visible defects are not used or distributed, regardless of product dates or when the foods were received.
5. If there are no visible defects, but there is a question as to the wholesomeness or safety of USDA donated foods, CSFP staff have the foods inspected by District

of Columbia health officials as soon as possible and contact FNS before taking further action.

6. USDA donated foods are subject to the same safeguards and effective management practices as other foods and shall be treated as other foods when safety is in question.

The Local Agency will provide monthly food safety reports to the State Agency.

## F. Food Safety Recall Procedures

The State Agency oversees food safety recall procedures statewide and provides updates using the State Emergency Notification System (SENS). SENS is a tool that allows State Agencies to rapidly communicate critical food recall information to Recipient Agencies so they can remove contaminated food from distribution, and keep participants safe.

### Definition of a Food Recall

A food recall is a voluntary action by a manufacturer or distributor to protect the public from products that may cause health problems or possible death. A recall is intended to remove food products from commerce when there is reason to believe the products may be adulterated or misbranded. Recalls are initiated by the manufacturer or distributor of the meat or poultry sometimes at the request of the Food Safety and Inspection Service (FSIS).

### Notification of Food Safety Recalls

FSIS notifies the public through a Recall Release for Class I and Class II recalls, and issues a Recall Notification Report (RNR) for Class III recall issues Both Recall Releases and RNRs are posted on the FSIS Website and distributed to FSIS email subscribers. When possible, FSIS also includes pictures of the recalled product labels as part of the FSIS online Recall Release posting.

For every Class I recall, FSIS develops a list of retail consignees that have, or have had, the recalled products in their possession. The list of retail consignees is posted within three (3) calendar days of the date of the recall and includes the name, street address, city, and state of each retail consignee. The retail consignee list is updated periodically as additional retail consignee information becomes available.

When available, FSIS posts recall press releases and RNRs on the FSIS Recalls area of the Web site, at [www.fsis.usda.gov/Fsis\\_Recalls/Open\\_Federal\\_Cases/index.asp](http://www.fsis.usda.gov/Fsis_Recalls/Open_Federal_Cases/index.asp). FISIS' newsletters, including Constituent Update, are also available via email subscription. The State Agency and Local Agency CAFB are required to subscribe to this electronic notification.

The Local Agency is required to request to receive FSIS press releases and recall announcements by subscribing to the FSIS website at [www.fsis.usda.gov/News\\_&\\_Events/Newsletters/index.asp](http://www.fsis.usda.gov/News_&_Events/Newsletters/index.asp).

## Procedures for Food Safety Recalls

When notified of a food recall, the Local Agency shall take the following steps:

1. Notify the State Agency, and FNS in writing of the food recall;
2. Gather and segregate impacted foods in a safe, locked location;
3. Label all food involved in the recall **“FOOD SAFETY RECALL—DO NOT DISTRIBUTE.”**
4. Notify Site Leaders and designated volunteers as soon as notification of affected product is received.
5. Site Leaders shall be instructed to remove the specific items on recall from each CSFP box and segregate it to a safe, locked location
6. Site Leaders shall also be notified of a date and time when the segregated product shall be collected by the CSFP Delivery Team.
7. Upon pick-up of product, Site Leaders shall confirm with the driver the amount of affected product that is being returned to the Local Agency for redirection, disposal or recondition.
8. Consult with DC Health regarding further instructions on storage and disposal of the affected food items.

### G. Out-of-Condition Foods

The Local Agency follows food handling operating procedures that include proper handling and food rotation. In the event that food becomes out of condition, the Local Agency follows federal and local procedures to move the product out of production. Out of condition foods are not distributed to CSFP participants.

CSFP staff shall report out-of-condition donated foods at storage agencies to the State Agency. CSFP staff shall remove the food, destroy or otherwise dispose of the food, in accordance with FNS guidance and District of Columbia requirements about food safety and health.

The Local Agency will report monthly on out-of-condition foods.

## 10. COPIES OF AGREEMENTS

*Reference: 7 CFR, Part 247.6(11)*  
*Citation: Each State agency must enter into an agreement with FNS prior to receiving funds. The state agency must enter into written agreements with local or subdistribution agencies prior to making commodities or administrative funds available to them. Copies of all agreements must be kept on file by the parties to the agreements.*

### A. Memorandum of Understanding Between DC Health and DACL

The Memorandum of Understanding (MOU) shall be the authorizing vehicle for transferring local funding from the DC Department of Aging and Community Living to the DC Department of Health. The MOU, updated annually or as determined in the MOU, is a binding agreement that details responsibilities between the two District agencies.

**Attachment H:** Memorandum of Understanding Between DC Health and DACL

## B. Agreement between DC Health and Local Agency

The agreement between DC Health and the Local Agency details the responsibilities of both parties and covers a maximum of five fiscal years. Any changes to the agreement affecting assurances will be submitted to USDA for review and approval.

**Attachment I:** Agreement Between DC Health and the Local Agency(ies)

## 11. PROGRAMMATIC ASSURANCES

*Reference: 7 CFR 247.34(a), 7 CFR 247.34(b), 7 CFR 250.12(b)*

### A. Management Reviews

DC Health shall perform an on-site review of all local agencies and storage facilities at least once every two years. As part of the on-site review, the State Agency shall evaluate all aspects of program administration, including:

1. Certification Procedures,
2. Nutrition Education,
3. Civil Rights Compliance,
4. Food Storage Practices,
5. Inventory Controls, and
6. Financial Management Systems

In addition to conducting on-site reviews, the State Agency shall evaluate program administration by reviewing on the following basis:

1. Financial Reports – quarterly at a minimum,
2. Audit Reports – annually minimum,
3. Food Orders – monthly at minimum
4. Inventory Reports – quarterly at a minimum and
5. Other Relevant Information (frequency to be determined by the report)

DC Health requires the Local Agency to monitor distribution sites and their storage facilities at least once per year and document all monitoring visits and reports. All monitoring visits shall be completed by August 1<sup>st</sup> of each year.

Attachment B: DC CSFP Distribution Sites list

Site Name	Site Type	Site Name	Site Type
2855 Fort Lincoln The Montana	Residential	Hayes Senior Wellness	Community
3001 Fort Lincoln The Gettysberg	Residential	Hedin House	Residential
3005 Fort Lincoln The Vicksberg*	Community	Israel Baptist	Community
3298 Fort Lincoln-The Petersburg	Residential	J.W.King	Residential
Arbor View Apartments	Residential	Jubilee Housing -The Ritz	Residential
Asbury Dwelling	Residential	Judiciary House	Residential
Asian and Pacific Island Senior Center	Community	Kennedy Rec Center	Community
Bernice Fonteneau	Community	Kentucky Court	Residential
Bread for the City SE	Community	Knox Hill	Residential
Brookland Manor	Community	Langston Terrace	Community
Capitol Gateway	Residential	National Baptist Memorial	Community
Capitol Hill Towers	Residential	NCBA Estates	Residential
Carroll Apartments	Residential	North Capitol	Residential
Carver Senior	Residential	Overlook	Residential
Carver Terrace Community	Community	Paradise	Residential
Casa Iris	Community	Paul Lawrence Dunbar	Residential
Cedar Heights	Residential	Potomac Gardens	Residential
Claridge Towers	Residential	Raymond Recreation Center	Community
Colony House	Residential	Regency	Residential
Colorado House	Residential	Robert L. Walls	Residential
Columbia Heights Village	Residential	Roundtree	Residential
Community Family Life Services	Community	Samuel Kelsey	Residential
Congress Park	Residential	SOME	Community
Crowder Owens	Community	Tenth Street Baptist	Community
Delta Towers	Residential	Triangle View Senior Living	Residential
East Capitol Walk-in Center	Community	UPO- Petey Greene	Community
East River Family	Community	Upper Room Baptist	Community
Edgewood Commons 611	Residential	Victory Square	Residential
Edgewood Terrace	Residential	VIDA Brightwood	Residential
Fairmont Apartments	Residential	VIDA Senior Center	Community
Frederick Douglas	Community	Walker House	Residential
Garfield Terrace	Residential	Wardman Court	Residential
Gethsemane Baptist Church	Community	We Are Family	Community
Green Valley	Residential	Wheeler Creek	Residential
Greenleaf	Community		
Harvard Towers	Residential		

Attachment C: Current Year Income Eligibility Guidelines

48 CONTIGUOUS STATES, THE DISTRICT OF COLUMBIA, AND PUERTO RICO*							
Household Size	Federal Poverty Guidelines - 100%	Children - 185%			Elderly - 130%		
	Annual	Annual	Monthly	Weekly	Annual	Monthly	Weekly
1.....	\$12,490	\$23,107	\$1,926	\$445	\$16,237	\$1,354	\$313
2.....	16,910	31,284	2,607	602	21,983	1,832	423
3.....	21,330	39,461	3,289	759	27,729	2,311	534
4.....	25,750	47,638	3,970	917	33,475	2,790	644
5.....	30,170	55,815	4,652	1,074	39,221	3,269	755
6.....	34,590	63,992	5,333	1,231	44,967	3,748	865
7.....	39,010	72,169	6,015	1,388	50,713	4,227	976
8.....	43,430	80,346	6,696	1,546	56,459	4,705	1,086
For each add'l household member, add...	4,420	8,177	682	158	5,746	479	111

ALASKA*				
Household Size	Federal Poverty Guidelines - 100%	Elderly - 130%		
	Annual	Annual	Monthly	Weekly
1.....	\$15,600	\$20,280	\$1,690	\$390
2.....	21,130	27,469	2,290	529
3.....	26,660	34,658	2,889	667
4.....	32,190	41,847	3,488	805
5.....	37,720	49,036	4,087	943
6.....	43,250	56,225	4,686	1,082
7.....	48,780	63,414	5,285	1,220
8.....	54,310	70,603	5,884	1,358
For each add'l household member, add...	5,530	7,189	600	139

HAWAII*				
Household Size	Federal Poverty Guidelines - 100%	Elderly - 130%		
	Annual	Annual	Monthly	Weekly
1.....	\$14,380	\$18,694	\$1,558	\$360
2.....	19,460	25,298	2,109	487
3.....	24,540	31,902	2,659	614
4.....	29,620	38,506	3,209	741
5.....	34,700	45,110	3,760	868
6.....	39,780	51,714	4,310	995
7.....	44,860	58,318	4,860	1,122
8.....	49,940	64,922	5,411	1,249
For each add'l household member, add...	5,080	6,604	551	127

\*CSFP State agencies must implement the adjusted income guidelines for elderly applicants immediately upon receipt. For children who were certified and enrolled as of February 6, 2014, each CSFP State agency must implement the adjusted guidelines at the same time that the WIC State agency implements the adjusted guidelines in WIC.

Attachment D: Acceptable Sources of Documentation of Age, Income, and Residency

<b>Proof of Age</b>	<b>Proof of Income</b>	<b>Proof of Residency</b>
Driver's License(valid)	Social Security Payments	Bill with current address (medical, cable, credit card, utility bill)
Birth Certificate	Pensions/Veteran's Payments	Bank account statement
Passport/Visa	Earning Statement	Current paystub
State ID	SNAP household certificate	Current SSI check
Hospital or Clinic Photo ID	Alimony/Child Support Documentation	Current Vehicle Registration
Immigration or Naturalization Record	Valid TANF or SNAP Letter (only if shows gross income)	Statement of residence, income or identify
Marriage Certificate/Marriage License	Valid W2 Form/Income Tax Return	Housing Authority ID Card with address
Military Discharge Papers (DD 14)		Lease Agreement
Passport/Visa		Letter from landlord
State ID		Rental Receipt (within last 30 days)
Voter Registration Card		Social Security letter with address
Work ID		Valid District of Columbia ID
Military ID		

# Attachment E: USDA Foods Available List for CSFP



## USDA Foods Available List for The Commodity Supplemental Food Program (CSFP) October 2018



USDA Foods Description	WBCSM ID	PACK SIZE	USDA Foods Description	WBCSM ID	PACK SIZE	SUBGROUP
<b>FRUITS</b>			<b>VEGETABLES</b>			
Apple Juice, 100%, Unsweetened	100893	8/64 ounce bottle	Beans, Green, Low-sodium, Canned	100306	24/15.5 ounce can	OTH
Applesauce, Unsweetened, Canned	100207	24/15.5 ounce can	Beans, Vegetarian, Low-sodium, Canned	100363	24/15.5 ounce can	LG
Apricots, Halves, Extra Light Syrup, Canned	100210	24/15.5 ounce can	Carrots, Sliced, Low-sodium, Canned	100308	24/15.5 ounce can	RO
Cranberry Apple Juice, 100%, Unsweetened	100899	8/64 ounce bottle	Corn, Whole Kernel, No Salt Added, Canned	100311	24/15.5 ounce can	ST
Grape Juice, Concord, 100%, Unsweetened	100895	8/64 ounce bottle	Mixed Vegetables, 7-Way Blend, Low-sodium, Canned	100320	24/15.5 ounce can	OTH
Mixed Fruit, Extra Light Syrup, Canned	100211	24/15.5 ounce can	Peas, Green, Low-sodium, Canned	100314	24/15.5 ounce can	ST
Orange Juice, 100%, Unsweetened	100897	8/64 ounce bottle	Potatoes, Sliced, Low-sodium, Canned	100331	24/15.5 ounce can	ST
Peaches, Sliced, Extra Light Syrup, Canned	100218	24/15.5 ounce can	Spaghetti Sauce, Low-sodium, Canned	100335	24/15.5 ounce can	RO
Pears, Extra Light Syrup, Canned	100223	24/15.5 ounce can	Spinach, Low-sodium, Canned	100323	24/15.5 ounce can	DG
Plums, Purple, Canned	100233	24/15.5 ounce can	Sweet Potatoes, Light Syrup, No Salt Added, Canned	100316	24/15.5 ounce can	RO
<b>PROTEIN FOODS</b>			Tomato Juice, 100%, Low-sodium	100898	8/64 ounce bottle	RO
Beans, Great Northern, Dry	100380	12/2 pound bag	Tomatoes, Diced, No Salt Added, Canned	100328	24/15.5 ounce can	RO
Beans, Kidney, Light Red, Dry	100385	12/2 pound bag	<b>GRAINS</b>			
Beans, Lima, Baby, Dry	100378	12/2 pound bag	Cereal, Corn Flakes	100449	12/18 ounce package	
Beans, Pinto, Dry	100382	12/2 pound bag	Cereal, Corn/Rice Biscuits	110265	14/12 ounce package	
Beef, Canned/Pouch	100127	24/24 ounce package	Cereal, Corn Squares	110740	14/12 ounce package	
Beef Chili, Without Beans, Canned/Pouch	100138	24/24 ounce package	Cereal, Oat Circles	100929	12/14 ounce package	WG
Beef Stew, Canned/Pouch	100526	24/24 ounce package	Cereal, Rice Crisp	100457	16/12 ounce package	
Chicken, Canned	110478	24/15 ounce can	Cereal, Wheat Bran Flakes	100933	14/17.3 ounce package	WG
Peanut Butter, Smooth	100395	12/18 ounce jar	Cereal, Wheat Farina, Enriched	110880	10/18 ounce package	
Salmon, Pink, Canned	110563	24/14.75 ounce can	Cereal, Wheat, Shredded	110374	10/16.4 ounce package	WG
Tuna, Chunk Light, Canned (K)	100194	24/12 ounce can	Grits, Corn, White	100470	8/5 pound bag	
<b>DAIRY</b>			Oats, Rolled, Quick Cooking	100465	12/42 ounce package	WG
Cheese, American, Reduced Fat, Loaves, Refrigerated	100035	12/2 pound package	Pasta, Macaroni, Enriched	110511	20/1 pound box	
Milk, 1%, Shelf-Stable UHT	100050	12/32 ounce carton	Pasta, Rotini, Whole Grain	110777	12/1 pound box	WG
Milk, Instant Nonfat Dry	111006	24/12.8 ounce package	Pasta, Spaghetti, Enriched	110450	20/1 pound box	
<b>KEY:</b>			Rice, Long Grain	100491	24/2 pound bag	
DG - Dark Green Vegetable Subgroup			Rice, Long Grain	100492	30/2 pound bag	
OTH - Other Vegetable Subgroup			Rice, Medium Grain	100487	24/2 pound bag	
RO - Red/Orange Vegetable Subgroup			Rice, Medium Grain	100488	30/2 pound bag	
ST - Starchy Vegetable Subgroup			Foods are arranged based on the food group categories found at ChooseMyPlate.gov. The subgroup information is provided as a tool to support program sites with planning orders and to encourage variety in CSFP food distributions. The ChooseMyPlate.gov site also provides additional information on vegetable subgroups, whole grains and a variety of nutrition education resources that can be used to support CSFP food distribution.			
LG - Legume Vegetable Subgroup						
WG - Whole Grain						
K - Kosher Certification Required						
UHT- Ultra-High Temperature Pasteurization						

Attachment F: Maximum Monthly Distribution Rates

Elderly

Food Package Category	Food Item	Package Size	Packages/Month	Amount/Month
Cereals	Cereal, Dry Ready-to-Eat <sup>1/</sup>	12-18 oz pkg	2 pkgs	24-36 oz
	or Farina <sup>1/</sup>	18 oz pkg	2 pkgs	36 oz
	or Rolled Oats	42-48 oz pkg	1 pkg	42-48 oz
	or Grits <sup>2/</sup>	5 lb pkg	1 pkg every other month	40 oz
Juices	Juice	64 oz container	2 containers	128 oz
Proteins	Beef	24 oz can	1 can	24 oz
	or Beef Stew	24 oz can	1 can	24 oz
	or Chili	24 oz can	1 can	24 oz
	or Chicken <sup>3/</sup>	10-15 oz can or pouch	2 cans or pouch	20-30 oz
	or Tuna <sup>3/</sup>	12 oz can	2 cans	24 oz
or Salmon <sup>3/</sup>	14.75 oz can	2 cans	29.5 oz	
Milk	UHT Fluid Milk 1% and Instant Nonfat Dry Milk <sup>4/</sup>	32 oz pkg	2 pkgs and	64 oz
		12.8 oz pkg	1 pkg or	12.8 oz (128 oz reconstituted)
		25.6 oz pkg	1 pkg every other month	
Peanut Butter/ Dry Beans	Peanut Butter or Dry Beans/Peas	18 oz pkg  2 lb pkg	1 pkg or 1 pkg	18 oz  32 oz
Potatoes/ Grains	Dehydrated Potatoes	1 lb pkg	1 pkg	16 oz
	or Pasta	1 lb pkg	2 pkgs	32 oz
	or Rice	2 lb pkg	1 pkg	32 oz
	or Grits <sup>2/</sup>	5 lb pkg	1 pkg every other month	40 oz
Cheese	Cheese	2 lb pkg	1 pkg	32 oz
Fruits	Fruits	15-16 oz can	2 cans	30-32 oz
Vegetables	Vegetables	15-16 oz can	4 cans	60-64 oz



**District of Columbia**  
**Commodity Supplemental Food Program**  
**Caseload Management and**  
**Outreach Plan**

## Executive Summary

The DC CSFP State Agency (SA) is committed to improving participation in the Commodity Supplemental Food Program (CSFP). CSFP is a cornerstone of senior nutrition programs in the District. While 2019 enrollment holds steady at 5,411, data suggests that there are more than 15,000 seniors who are eligible. This Caseload Management and Outreach Plan provides a high level overview of the DC CSFP strategy to meet authorized participation levels and to build strategic partnerships. For more detailed information about DC CSFP, please refer to the DC CSFP State Plan (State Plan).

The priorities of caseload management and outreach are to ensure maximum program reach and participation, strengthening public and private partnerships, and using data to inform decision making around improving access and utilization of CSFP.

Outreach and community engagement form a cornerstone of DC CSFP caseload management planning. It is a way of conducting business to ensure that eligible seniors, their families, along with public and private partners are made aware of, understand, and have a working knowledge of CSFP. Intentional, effective outreach ensures that program services are equitable and accessible to all eligible residents. Successful outreach efforts can lead to increased CSFP utilization.

DC Health provides oversight to the LA pertaining to CSFP outreach and community engagement to assure equity and accessibility by all seniors. Intentional, effective outreach involves:

- A. Understanding the target audience, including DC specific demographics and challenges faced in accessing services.
- B. Developing partnerships and working relationships with seniors, their families, caregivers and partners.
- C. Earning the trust and acceptance of the seniors their families, caregivers and partners.
- D. Using communication techniques which are most appropriate for seniors, their families, caregivers and partners.

## Plan Description

### **Providing CSFP Services at the Maximum Authorized Participation Level**

This Caseload Management and Outreach plan, along with the CSFP State Plan provides a framework for meeting authorized caseload  $\geq 98\%$  on a monthly basis. This will be accomplished by utilizing existing tools, cultivating new and existing partnerships, and implementing a data informed approach to program management. Existing tools include setting minimum standards for application of the waiting list and proxy procedures.

### **Strengthening Public and Private Partnerships**

Cultivation of and existing partnerships begins with the Local Agency and expands to include distribution sites and anti-hunger and age-friendly advocates. Opportunities for new partnerships center around accessing program providers targeting the homebound, homeless and veteran population. The framework below describes the strategic priority, related objective and performance indicators for coordinating with partners around outreach messaging, advocacy convening, warm handoff referrals to seniors and their families receiving services from government agencies and community partners inclusive of those noted below. All of these entities have a vested interest in improving senior wellness as we collectively work to make the District an Age Friendly city.

- A. DC Department of Human Services – SNAP
- B. DC Department of Healthcare Finance – Medicaid
- C. DC Department of Aging and Community Living– SeniorNetwork
- D. DC Housing Authority
- E. DC Parks and Recreation Home Delivered Meal Programs (those targeting those homebound due to chronic illness vs. those offered by DC Office onAging)
- F. Healthy Corners StoresPartnerships

A more exhaustive list of community partners can be found in the State Plan.

### Using Data to Inform Decision Making

During the FY 2019 October recertification, CAFB completed the process inclusive of approximately 400 wait listed seniors. This number is twice the number from FY 2018. Even with a wait list representing more than 7% of the authorized caseload, DC CSFP utilization averages only 95%.

A brief review of the certification documents from previous fiscal years showed that approximately 30% of participants did not have proxies. Increasing the number of wait listed seniors as well as the number who not only have, but use proxies, is part of ongoing caseload management strategy.

Other factors that will inform the caseload management process includes data gleaned from participant surveys. Our data tells us a greater number of DC seniors access the internet via computer or smart phone than previously thought. Seniors are using cellphones to send and receive messages (email and text) and DC CSFP will collaborate with other DC Health nutrition programs that are successfully using text messaging and other strategies to provide appointment reminders and health and wellness information.

### Evaluation

Evaluation of the Caseload Management and Outreach Plan will be ongoing and involve process and outcome measurements. Data gleaned from the evaluation process will be used to improve services, strengthen partnerships, and promote the DC CSFP across the District.

<b><i>Strategic Caseload Management/Outreach Priority #1: Promote participation at the maximum authorized level</i></b>
<b>Measureable Objectives/Activities</b>
<b>Objective #1: Maintain monthly CSFP participation at ≥98% of authorized caseload</b>
<b>Key Indicator(s): Caseload ≥98%</b>
<b>Key External Partner(s): Local Agency, DC Department on Aging and Community Living</b>
<b><u>Key Activities to Meet this Objective</u></b>
<b>A. Implementation of data informed decision making</b>
<b>1.Completion of customer feedback activities</b>
<b>2.Utilize caseload related data to align service delivery</b>
<b>3.Implement caseload and outreach operating procedures that support participation</b>
<b>B. Provide monthly participation report</b>

<b>Objective #2: Maintain a waiting list roster that is ≥10% of approved caseload</b>
<b>Key Indicator(s):</b> Waiting list is ≥10% of caseload
<b>Key External Partner(s):</b> CAFB
<b>Key Activities to Meet this Objective</b>
A. Continuous enrollment of seniors throughout the year
B. Monthly review of CSFP waitlist data to inform caseload management strategies
<b>Objective #3: Promote CSFP food and nutrition services targeting underserved geographical areas and senior demographics</b>
<b>Key Indicator(s):</b> Increased participation in underserved areas of the District
<b>Key External Partner(s):</b> Local Agency
<b>Key Activities to Meet this Objective</b>
A. Conduct a community needs assessment to determine gaps in service
B. Increase coordination of outreach efforts with DAFL and other age-friendly advocates
B. Update current CSFP application that include new certification and annual review periods
<b>Strategic Caseload Management/Outreach Priority #2: <i>Strengthen public and private partnerships to expand the reach of DC CSFP</i></b>
<b>Measureable Objectives/Activities</b>
<b>Objective #1: Target undeserved seniors including homeless and homebound</b>
<b>Key Indicator(s):</b> Proportionate increase over the next three years in participation of the number of homeless and homebound seniors
<b>Key External Partner(s):</b> Local Agency
<b>Key Activities to Meet this Objective</b>
A. Determine service gaps
B. Expand network to include agencies serving these populations
C. Identify other community sites for potential CSFP participation
<b>Objective #2: Participate in senior advocacy convening activities</b>
<b>Key Indicator(s):</b> Increase in new partnerships over a three year period
<b>Key External Partner(s):</b> Local Agency
<b>Key Activities to Meet this Objective</b>
A. Promote DC CSFP across public and private sectors
B. Expand network to include agencies serving target populations
C. Identify other community sites for potential CSFP participation
<b>Strategic Caseload Management/Outreach Priority #3: <i>Identify and address potential institutional and systemic barriers that prevent seniors from full participation</i></b>
<b>Measureable Objectives/Activities</b>
<b>Objective #1: Maintain proxy participation at ≥60%</b>
<b>Key Indicator(s):</b> Proxy participation is ≥60%
<b>Key External Partner(s):</b> Local Agency
<b>Key Activities to Meet this Objective</b>

A. Promote proxy enrollment during mass enrollment periods
B. Provide literature to seniors throughout the year encouraging the use of proxies
<b>Objective #2: Analyze results of participant satisfaction survey to identify strengths, weaknesses and overall program feedback</b>
<b>Key Indicator(s): 80% of surveys completed by CSFP participants</b>
<b>Key External Partner(s): Local Agency</b>
<b><u>Key Activities to Meet this Objective</u></b>
A. Develop participant satisfaction survey
B. Disseminate participant satisfaction survey
C. Collect results from client satisfaction survey
<b>Objective #3: Increase the number of homebound seniors participating in CSFP participants</b>
<b>Key Indicator(s): Fill 70% of CSFP participant slots for homebound seniors</b>
<b>Key External Partner(s): CAFB</b>
<b><u>Key Activities to Meet this Objective</u></b>
A. Evaluate current home bound CSFP participants
B. Create a campaign focused on reaching home bound seniors in the District
C. Establish a referral network that provide support to home bound seniors.

## District of Columbia CSFP

### Nutrition Education Plan

#### Executive Summary

The Commodity Supplemental Food Program (CSFP) is a nutrition program funded by the United States Department of Agriculture (USDA). CSFP works to improve the health of low-income elderly persons aged 60 and older by supplementing their diets with nutritious USDA Foods, providing nutrition and wellness education, and making referrals to relevant programs and services. CSFP food packages do not provide a complete diet, but are good sources of key nutrients typically lacking in the diets of seniors. Participants are offered nutritious foods including low sodium canned vegetables, low fat dairy products, whole grain cereals and pasta and lean meats, poultry, fish and dry beans.

Through CSFP, USDA distributes administrative funds and food to State Agencies. The DC CSFP State Agency (SA), housed in the Community Health Administration at DC Health, is committed to providing evidence and practice based nutrition and wellness education to participants in the Commodity Supplemental Food Program. Educational materials used in the DC CSFP align with guidance provided by the Dietary Guidelines for Americans, the Physical Activity Guidelines for Americans, MyPlate. DC CSFP nutrition education activities include additional materials reviewed by SNAP-Ed.

DC CSFP is a cornerstone senior nutrition program in the District reaching more than 5,400 residents. This Nutrition Education Plan provides a high level overview of District nutrition and wellness education priorities. For more detailed information about the DC CSFP, please refer to the 2020 DC CSFP State Plan.

Specifically, the goal of the plan is to provide CSFP nutrition education providers with guidance and standards to ensure that only evidence and practice based information is shared with seniors. Nutrition education priorities for the DC CSFP include improving senior self-efficacy around health and wellness. Specifically:

#### **Priorities**

1. Empowering seniors with knowledge, skills, and confidence to manage their health and wellness to positively impact long term health and wellness
2. Encourage full utilization of the food package by providing seniors with the positive impact USDA Foods play in long term health and wellness.

#### Nutrition Education at CSFP Sites

Nutrition education will be offered using a variety of formats including, but not limited to one on one meetings, group sessions, educational handouts placed directly in the monthly food box,

food and nutrition materials posted on the DC GetFresh micropage, and text messaging. DC CSFP data tells us that a greater number of DC seniors access the internet via computer or smart phone than previously thought. Seniors are using cellphones to send and receive messages (email and text) and DC CSFP will collaborate with other DC Health nutrition programs that are successfully using text messaging and other strategies to provide health and wellness information.

## Food Package Menu

The CSFP Food Package is an educational tool in and of itself and will guide nutrition education activities. As noted, food packages provided in the monthly distribution include wholesome, nutritious, and culturally appropriate foods including low sodium canned vegetables, low fat dairy products, whole grain cereals and pasta. The package also includes lean meats, poultry, fish and dry beans.

The State Agency and the Local Agency are working to provide CSFP participants new package guidelines prior to November 1, 2019.

## Partnerships

In order to effectively implement the NE plan, DC CSFP will continue to rely cross sector partnerships through the District. On site volunteers, distribution site nutritionists, Snap-Ed nutrition educators continue to be essential to the success of this component of CSFP.

## Implementation

Implementation of the plan will begin in early Fiscal Year 2020.

## Evaluation

The Nutrition Education Plan will be evaluated through the collection of feedback (biannually, monthly, etc.) and post lesson/activity surveys. This feedback will focus on evaluating main components of the nutrition education materials and activities such as, handout relevance, recipe utilization, and use of CSFPs in menu planning.

## Monthly Nutrition Education Calendar

The monthly calendar of education topics is shared below and includes handouts, recipes, and website links for the educator to use as a guide.

## Summary

The DC CSFP Nutrition Education Plan is a work in progress and will continue to evolve. SNAP-Ed is a key partner at DC Health involved with the development of the plan. Updates to the plan will be sent to USDA as they are made.

## Nutrition Education Monthly Calendar

Month	Topic	Health Observance	Food Package Category / Food Item	Handout 1	Handout 2	Recipe 1	Recipe 2	Recipe 3	Recipe Websites
October	Food Waste	Eat Better Together Month	Grains / Elbow Macaroni	<a href="#">Food Waste</a>	NA	<a href="#">Minestrone Soup</a>	<a href="#">Mac and Cheese Cups</a>	<a href="#">Spinach and Pasta</a>	<a href="https://www.azhealthzone.org/recipes">https://www.azhealthzone.org/recipes</a>
November	The Power of Protein	National Sandwich Day (Nov 3)	Protein Foods / Canned Tuna	<a href="#">Protein Foods</a>	NA	<a href="#">Apple Tuna Sandwich</a>	<a href="#">Tuna Quesadillas</a>	NA	<a href="https://www.nia.nih.gov/">https://www.nia.nih.gov/</a>
December	Healthy Holiday Eating	Healthy Holidays	Dairy / Milk	<a href="#">Healthy Holiday Choices</a>	NA	<a href="#">Apple Spice Baked Oatmeal</a>	<a href="#">Green Pea Soup</a>	<a href="#">Quick Tomato Soup</a>	<a href="https://extension.usu.edu/foodsense/recipes/">https://extension.usu.edu/foodsense/recipes/</a>
January	Top Foods for Eye Health	National Glaucoma Awareness Month	Fruit / Canned Peaches	<a href="#">Top Foods for Eye Health</a>	NA	<a href="#">Peach and Carrot Smoothie</a>	<a href="#">Super Sundae</a>	NA	<a href="https://spendsmart.extension.iastate.edu/recipe-category/side-dish/">https://spendsmart.extension.iastate.edu/recipe-category/side-dish/</a>
February	Eat more Whole Grains	American Heart Month	Grains / Rice	<a href="#">Whole Grains</a>	<a href="#">New Physical Activity Guidelines for Seniors</a>	<a href="#">Chicken Rice Bake</a>	<a href="#">Chicken Vegetable Soup with Kale</a>	<a href="#">Broccoli Rice Casserole</a>	<a href="https://foodhero.org/recipes/healthy-recipes">https://foodhero.org/recipes/healthy-recipes</a>
March	Benefits of Seafood	National Nutrition Month	Protein Foods / Canned Salmon	<a href="#">Eat Seafood</a>	NA	<a href="#">Salmon Pasta Skillet</a>	<a href="#">Salmon Salad Mix</a>	<a href="#">Tuna Pasta Salad</a>	<a href="https://whatscooking.fns.usda.gov/">https://whatscooking.fns.usda.gov/</a>
April	Nutrition for Older Adults	National Garden Month	Vegetables / Canned Green Beans	<a href="#">Choosing Healthy Meals as You Get Older</a>	NA	<a href="#">Green Beans, Onions, and Almonds</a>	<a href="#">Honey Mustard Green Beans</a>	NA	<a href="https://www.fruitsandveggiesmorematters.org/main-recipes">https://www.fruitsandveggiesmorematters.org/main-recipes</a>
May	Importance of Dairy / Physical Activity	National Osteoporosis Awareness and Prevention Month	Dairy / Milk	<a href="#">Got Your Dairy Today</a>	<a href="#">Be Active Adults</a>	<a href="#">Fruit Smoothie</a>	<a href="#">Tropical Smoothie</a>	NA	NA
June	More - More - More - Fresh, Frozen, and Canned Fruits and Veggies	National Fresh Fruit and Vegetable Month	Fruit / Canned Pears	<a href="#">Liven Up Your Meals</a>	NA	<a href="#">Pear Quesadillas</a>	<a href="#">Chicken and Pear Salad</a>	NA	NA
July	Bring on the Veggies	Farmers' Market Promotion	Vegetables / Canned Diced Tomatoes	<a href="#">Add More Vegetables</a>	NA	<a href="#">Peach Salsa</a>	<a href="#">Green and Yellow Bean Salad</a>	<a href="#">3-can-chili</a>	NA
August	Stretch Your Food Budget	Grocery Plus Month**	Protein Foods / Canned Chicken	<a href="#">Save More at the Grocery Store</a>	<a href="#">Smart Shopping</a>	<a href="#">Chicken Enchilada Soup</a>	<a href="#">Chicken Salad Wrap</a>	<a href="#">2-Step Chicken</a>	NA
September	Food Safety	National Food Safety Education Month	Grains / Spaghetti	<a href="#">Be Food Safe</a>	NA	<a href="#">Spinach and Pasta</a>	<a href="#">Spaghetti with a Secret</a>	<a href="#">Sesame Noodles with Broccoli and Chicken</a>	NA