

West Ohio Food Bank, FFY 2010 Regional Plan for Local Distributors

Definitions

For purposes of this plan, West Ohio Food Bank (WOFB) defines our terms as follows:

Sub-Regional Agent: (SRA): An organization which contracts with the Ohio Department of Job & Family Services (ODJFS) to receive commodities directly from the United States Department of Agriculture (USDA); to distribute TEFAP commodities to the Local Distributor (LD) in the SRA's defined service region; and to administer the Emergency Food Assistance Program (EFAP) according to the Ohio Administrative Code (OAC) 5101: 4-50 and the Food Programs Manual.

Local Distributor (LD): A private or public 501(c) 3 organization which contracts with an SubRA to receive and distribute commodities to eligible persons, such as a food pantry, soup kitchen or shelter.

Food Pantry: A part of a foodbank network that distributes food and grocery products to low-income households, including food from sources other than USDA, to relieve situations of emergency and distress. It is housed in a standing facility that distributes commodities, among other food and grocery products, on a regular basis.

Choice Pantry: A food pantry that allows clients a choice in determining the groceries received at the food pantry. The method of allowing client choice may vary based on product availability and/or limited physical space at the pantry.

Household: A single person or group of related or non-related individuals living as one economic unit who buy and cook food together.

Households With Minor Children: A group of related or non-related individuals living as one economic unit, with children aged 0 – 17 years old, who buy and cook food together.

Households Without Minor Children: A single person or group of related or non-related individuals, with no one under the age of 18, living as one economic unit who buy and cook food together.

Homeless Shelter: A facility that is part of a foodbank network providing temporary or transitional shelter for homeless individuals and families in general or for specific group populations (i.e. battered women, run-away youth).

Soup Kitchen: A facility that is part of a foodbank network that is a clean, secure environment that offers prepared meals free of charge to predominately needy people. Soup Kitchens serve nutritious meals in a congregate setting or take-home meals without charge, for homeless persons, transient persons and/or others in need.

TEFAP: An acronym for The Emergency Food Assistance Program which provides USDA commodities for distribution.

OFP: An acronym for Ohio Food Purchase which provides food commodities purchased through a state funded program.

ACP: An acronym for Agriculture Clearance Program which provides fresh produce purchased through a state funded program.

THE PLAN

Allocations

WOFB may receive up to 4.20% of the TEFAP commodities allocated to the State of Ohio. In order to insure equitable distribution of those commodities, we have developed an allocation system using the same formula ODJFS uses to allocate commodities to this region at 200% of the poverty level

West Ohio Food Bank 4.20% of Region:

Allen	31103	3.21%
Auglaize	9263	0.96%
Hancock	15123	1.56%
Hardin	9503	0.98%
Mercer	8503	0.88%
Paulding	5234	0.54%
Putnam	6715	0.69%
Seneca	16102	1.60%
Shelby	9938	1.03%
Van Wert	6853	0.71%
Wyandot	5420	0.56%

Allocations for each month will be made following the month the SRA receives the product. For instance, product received by WOFB in January will be allocated to LD's in February.

WOFB has developed an allocation formula for each LD in counties WOFB serves directly based on that LD's percentage of service in the county in which the LD resides.

LD Contractor Eligibility

All LD's, whether served by the SRA must meet the following contractor eligibility:

Food Pantries: TEFAP & OFP commodities are to be incorporated into the food pantry inventory and provided to all eligible persons as part of the food package. **TEFAP & OFP commodities are not to be the singular source of food supply at a pantry.** Other sources of food may include food banks, donated food, food drives or food purchase plans. All Food Pantries are encouraged to establish a client choice model of distribution.

Food pantries receiving TEFAP & OFP commodities must allow clients to access food, at a minimum, once a month, until such time the client no longer needs to visit a food pantry. **A once-a-month give-away of only TEFAP & OFP commodities is prohibited.** A once-a-month food give-away that includes TEFAP & OFP commodities as part of the food

package is discouraged. Pantries should establish regular hours of operation (at least one day each week) and set procedures for referral and/or on-call access. This policy will help to establish and maintain a statewide minimum level of service.

Soup Kitchens/Shelters: These LD's must provide regularly scheduled on-site or home-delivered meals which may use TEFAP & OFP commodities in the meal preparation. **TEFAP & OFP commodities must not be the singular source of food supply at a meal site.** Other sources may include food banks, donated food, food drives or food purchase plans. Soup Kitchens may be open to the general public or be located in a shelter that provides meals to only sheltered individuals or families. **They may provide up to three regularly scheduled meals and a snack each day but must provide at least one complete meal each day.** Eligibility determinations are not required at meal sites.

Transportation

WOFB has developed a monthly delivery calendar, which establishes at least one delivery day each month for each county. Deliveries charges are; 999 lbs or less >\$35.00

1,000-9,000 lbs >.06¢ per pound, 9,001-18,000 lbs >.08¢ per pound, 18,001 lbs and over >.10¢ per pound.

Each LD will receive a Delivery Confirmation Notice (DCN) the last week of the month for the following month's delivery of commodities. The DCN will detail, delivery date and time of delivery.

Call Alicia Sprague: 419-222-79476 or email confirmation or corrections of delivery to, alicia@wofb.org within 2 full business days before delivery.

Notices of Allocations

The LD is required to confirm their allocation with the SRA no later than 2 full business days before the delivery date, and will have the opportunity to reduce their allocation at that time. Confirmation of TEFAP & OFP allocations are to be made phone 419-222-7946. The LD Customer Service Representative will confirm or reduce your allocations at this time.

Due to the highly perishable nature of ACP produce, ACP will not be allocated to LDs. The SRA may from time to time call an LD and offer ACP produce. The LD will be responsible for transporting any ACP produce they may want from WOFB within 24 hours of acceptance.

TEFAP & OFP Commodity Receipt and Storage

Receipting: LD will check commodities for damage at time of receipt. LD will count commodities on the invoice at time of receipt and verify the amount shown on the SRA's invoice. After this process is completed the LD will sign the invoice and

retain a copy for their records. These invoices need kept for (1) one year. If the LD is picking up at the food bank and a discrepancy isn't found at time of loading, LD will notify SRA within 48 hours of receipt of the product.

Storage: When physical delivery of TEFAP & OFP food product is taken, the LD assumes responsibility for the safekeeping of product. Premature deterioration of food products is often the result of improper storage conditions and practices.

LD's should make every effort to distribute allocated TEFAP & OFP commodities in a timely fashion. LD's should be able to distribute each month's allocation of food before receiving the next month's allocation.

Every effort must be made to reduce loss due to spoilage, pest infestation and theft by following accepted warehousing and storage methods.

Temperature logs should be maintained for all storage areas. The log should document the date and time, the registered temperature and signature or initials of person checking the temperatures. This log is an important document to support the on going maintenance of proper storage conditions.

LD must maintain a good pest control system with a qualified person on staff or contract with a licensed firm to handle pest control management.

To assure the quality and freshness of TEFAP & OFP food products, the inventory practice of First In/ First Out (FIFO) must be followed. Food must be stored so cases with the oldest pack dates are used first. All TEFAP food products have the pack date on the cases.

LD may date the cases of product based on their receipt date as an easy way to keep track of the FIFO inventory requirements.

Commodities must be stored pursuant to all federal, state and local health codes. In addition:

Dry food products must be stored:

- At 50 - 70 degrees F.
- Away from direct sunlight.
- A minimum of 6" off the floor.
- At least 4" away from walls.
- Stacked on shelving with sealed surface or pallets
- Non-Food is to be stored separately from food, or at the minimum, stored below food products on shelving or in cabinets.
- Storage area must be clean, secure and inspected regularly.
- Stacked or shelved away from potential damage by heat, steam or water.
- Thermometers must be visible and functional.

Refrigerated Food products must be:

- Refrigerated at temperatures of 35 - 40 degrees F.
- Stored to allow for proper air circulation.
- In a refrigerator that is clean and inspected on a regular basis.
- Thermometers must be visible and functional.

Frozen food products must be:

- Stored in freezer that can maintain a temperature at 0 degrees F or below.
- Stored to allow for proper air circulation.
- Stored in a freezer unit that is clean, secure and regularly inspected.
- Thermometers must be visible and functional.

Shared Maintenance Contribution

All TEFAP commodities WOFB distributes directly to LD's will carry a 10¢ per pound charge. The charges will be detailed on the invoice at time of receipt. OFP commodities and ACP Produce will be distributed at no charge. But will carry a delivery charge according to weight. See Transportation.

Client Eligibility

Eligibility for receipt of a food package containing TEFAP & OFP commodities or distribution of ACP produce is established at 200% of the current federal poverty level as formulated by the United States Department of Health and Human Services. **No proof of income is required.** Clients must show proof of residency. Clients must sign a self-declaration of eligibility. LD is not liable for in-eligible clients who receive a federal food benefit by improperly self-declaring eligibility. See attachment for income guidelines. **These guidelines change from year to year, so the LD should check the effective dates on the forms to be sure they are using the current form.**

In documenting household size or composition, LD's should remind clients that the entire (single or multiple family) household income must be considered when the client certifies household income eligibility. Proof of family size or household composition is not required, NOR is it *prohibited*. However, should you decide to require proof of family size or household composition, the requirement must be applied to all program participants and their families.

Clients do not have to **prove** their income eligibility, with any type of documentation or provide their social security number. They can review the income eligibility guidelines and "self-declare" their eligibility as long as they sign The Eligibility to Take Food Home form. **Clients must sign The Eligibility to Take Food Home form each time they receive either federal or state funded food which includes TEFAP, OFP and ACP.** LD's must retain these records for three years.

Eligibility to Take Food Home Form

ALL pantries distributing TEFAP and/or state program food (OFP or ACP), must use the exact "Eligibility to Take Food Home" form as provided with this Regional Plan. If additional information is required for other programs or funders, a separate form should be used IN ADDITION to our form.

See attachment for The Eligibility to Take Food Home form LDs must use for the client's self-declaration of income eligibility, household size and residency.

If the LD is a soup kitchen or a shelter and uses TEFAP & OFP commodities or ACP produce in the meals served, clients do not have to sign for their meals, nor does this type of LD have to maintain any type of records on self-declaration of income. However, Soup Kitchens and Shelters must track the number of meals served and the number of people served at each meal.

Additionally, clients do not have to live in a community for a given period of time before they can receive TEFAP & OFP commodities or ACP Produce. Homeless persons or people who have just arrived in the area may not be able to provide an address and cannot be refused TEFAP & OFP commodities or ACP Produce because they have no address.

LD's must display the 'And Justice for All' posters in their lobby or waiting area, accessible to clients.

Distribution Guidelines

LDs are not required to track how many cans, boxes or bags of TEFAP & OFP commodities or ACP Produce given to each client since the commodities are part of a bag of groceries provided. There are no TEFAP & OFP commodity or ACP Produce distribution guidelines, the LD may give as much or as little as deemed necessary to meet the clients need. Additionally, LDs may give TEFAP & OFP commodities or ACP Produce as many times as deemed necessary in a given month to the same person or family. The philosophy is to try to give the needy person or family as much as the LD reasonably can, to help them through the crisis that landed them in the LDs office in the first place.

Loss or Damage of Commodities

All instances of loss or damage of commodities in excess of two cases must be reported to the SRA by telephone upon the discovery of the loss.

If the loss is due to spoilage, contamination or tampering:

- a. The product must be inspected by the local health department to determine if it is fit for human consumption. LD must submit the health departments report with a report of loss or damage.
- b. If disposal of the product is required, the LD will return all product found out of condition to the SubRegional Agent at the LD's expense.

- c. If the loss is due to theft, the LD will report the theft to the local police and submit a copy of the police report to the SubRegional Agent.
- d. If losses by LD exceed one percent of the amount of commodities received within the month during which the loss occurred, and if the LD is at fault for the loss or damage, the SRA may request reimbursement or replacement in-kind equivalent to the value of the lost or damaged commodities.

In either instance, the LD must provide the following information when reporting loss or damage of USDA commodities:

- Organization name, address, contact person and phone number.
- Product name, delivery order number and quantity affected.
- Date damage/loss discovered.
- Explanation of damage/loss.
- Disposition of product.

Statistical Reporting

All LD's are required to submit statistical reports listing the number of **households with minor children, detailing the number of adults 60+ years, adults 18-59 years, children 0 to 17 years and total people**; and **households without minor children detailing the number of adults 60+ years, adults 18-59 years and total people**; and **total households served, adults 60+ years, adults 18-59 years, children 0 to 17 years and total people** served in pantries; and the number of **people and meals** served in shelters and soup kitchens. These reports are due the 15th of the month following the month to which the report pertains. See attachment for Statistical Report Form.

LD's that do not file their statistical reports on time may be put on product hold until reports are up to date. WOFB does not want to take punitive measures (like holding allocated product) against those LD's not submitting statistical reports in a timely fashion. However, the importance of reporting accurate numbers cannot be stressed enough. **To save this program for future years we must be able to prove its viability. This can only be done with the statistics of people and meals provided by this program.** You will be notified if you are falling behind on your statistics.

Monitoring

WOFB will conduct an annual site review of one third or 50 (whichever is fewer) of all LD's contracting directly with WOFB.

Prohibited Activities

Recipients may not be charged fees for commodities, nor may they be asked for donations of any type.

LD's will not display any type of donation canister in the area where clients are being served; nor distribute voluntary donation envelopes at meals sites or pantries.

Recipients will not be required to be a member of any organization or participate in any religious services as a condition for distribution or receipt of commodities.

Recipients will not be required to have a referral from any other entity as a condition for distribution or receipt of commodities.

LD's may not sell, exchange, use for personal gain or in any fraudulent manner any TEFAP & OFP commodities or ACP Produce received by the SRA.

LD's acknowledge that in accordance with Federal laws and USDA policy, they are prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, Washington DC 20250-9410 or call 202-720-5964. USDA is an equal opportunity provider and employer.

Unless the LD is a soup kitchen or shelter, COMMODITIES MAY NOT BE OPENED OR ALTERED by any LD. (NO REPACKING)

Complaints

USDA and SRA makes every effort to ensure that commodities provided through TEFAP & OFP or ACP Produce are nutritious and of the highest quality. However, as in the food business, if there are concerns with the quality or safety of any commodity food, recipients may file a complaint.

ODJFS has developed a Commodity Complaint Form for TEFAP Commodities (found in the Food Programs Manual) which is to be used by LD's when filing a complaint or receiving a commodity complaint by a program recipient. The form is to be submitted to SRA, who will then forward the complaint to ODJFS. **If replacement product is being sought, you must keep the product until you have been notified what to do with it.**

The information needed to complete the form is the:

- Delivery order number (DO#)
- Contract number (may be stenciled on the outer carton)
- A description of the problem
- Date the product was received
- Location of the product
- Quantity of product involved

The DO# will be on the invoice you received with the commodity, or you can contact the SRA to obtain it. USDA needs the DO# to determine which vendor produced the product and to resolve the complaint. The DO# will look like this: 339L054 and provides a lot of information. It breaks down like this:

- The first three digits (339) indicate the state of Ohio.
- The letter (L) designates the fiscal year the product was shipped. This letter will change with each Fiscal Year.
- The last three numbers indicate the specific delivery order.

Authority

WOFB is granted authority to develop this plan by the State of Ohio, through OAC Rule 5101: 4-50-01 through 06.

Listing of Attachments and Forms

Eligibility to Take Food Home Form: The income guidelines change every Federal Fiscal Year, so check the effective date on form to insure you are using the proper form. **This form is also available in Spanish and Somalia.**

Income Guidelines: This form should be posted in the waiting area. **This form is also available in Spanish and Somalia.**

Temperature Log: This form should be used to record your daily check of temperatures for all dry and cold storage areas.

Statistical Report Form: This form is used to report your monthly statistics to WOFB. You must report households with minor children separately from households without minor children.

Customer Service Representatives: A list of Customer Service Representatives for each LD.

Copies of all forms are available from West Ohio Food Bank or on the website, www.westohiofoodbank.org, Agency Information, Miscellaneous Forms.