

COMMODITY SUPPLEMENTAL FOOD PROGRAM STATE PLAN

Commodity Supplemental Food Program

Division of Food and Nutrition

State Plan

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1. PURPOSE OF COMMODITY SUPPLEMENTAL FOOD PROGRAM

The Commodity Supplemental Food Program (CSFP) works to improve the health of low-income persons at least 60 years of age by supplementing their diets with nutritious USDA Foods. Through CSFP, USDA distributes both food and administrative funds to participating States and Indian Tribal Organizations.

2. STATE AND LOCAL AGENCY IDENTIFICATION

The Nevada Department of Agriculture (NDA), Division of Food and Nutrition, will act as the State agency for the Commodity Supplemental Food Program (CSFP). NDA has a successful history of administering other USDA food programs such as The Emergency Food Assistance Program (TEFAP), Food Distribution Program on Indian Reservations (FDPIR), Nutrition Services Incentive Program (NSIP), Schools/Child Nutrition Programs, State Food Processing Program and the Senior Farmers Market Nutrition Program (SFMNP). While administering CSFP at the State level, NDA will train, monitor and review the contracted Local agencies statewide. NDA will store and deliver USDA foods for local agencies that do not have adequate warehousing capabilities for receiving and storing USDA Foods.

NDA has agreements with three (3) local agencies to administer CSFP:

Food Bank of Northern Nevada (FBNN)

Service Area: Carson City, Churchill, Douglas, Eureka, Humboldt, Lander, Lyon, Mineral Northern Nye, Pershing, Storey, Washoe and White Pine Counties 550 Italy Way McCarran, NV 89434 (775) 331-3663

Elko Senior Center

Service Area: Elko County

1795 Ruby View Dr. Elko, NV 89801 (775) 738-3030

The Just One Project

Service Area: Clark County

1401 N Decatur Blvd. Suite 34 Las Vegas, NV 89108 (702) 462-2253

3. SERVICE PLAN AND CASELOAD NEED

The USDA Food and Nutrition Service (FNS) allocates CSFP caseload (the number of participants who may receive benefits each month) to NDA annually based on the previous year's participation and NDA's caseload request. NDA further allocates caseload to the local agencies by taking into consideration the following criteria per 7 CFR § 247.6(c)(4):

- o The need in the service area;
- o The local agency's caseload request;
- The capacity of the local agency to manage the caseload and provide proper program administration at the local level.

Nevada's caseload of 4,902 for FFY 2025 allows service to approximately 6% of eligible seniors in the state. NDA calculates that there are approximately 80,840 seniors who would be eligible for CSFP benefits state-wide.

Food packages will be distributed on a monthly basis. Whenever possible, clients will receive other food (from other programs) that are also available at the distribution site. This should reduce the number of trips a client may need to make to the distribution site each month as well as increase the chances that the entire family will be able to have complete meals. Typically, volunteers will "pre-pack" the CSFP food into standard food packages. Local agencies may deliver food packages to seniors in need either through volunteer drivers or contracted delivery service.

4. CERTIFICATION STANDARDS AND ELIGIBILITY

Applicants must meet the following qualifications:

- 1. Be 60 years of age or older.
- 2. Have income equal to or less than 150% of Poverty Income Guidelines as published annually. NDA will notify the local agencies each year of the maximum annual income to be used in determining eligibility for seniors.
- 3. Proof of income is not a requirement for an applicant to participate. Copies of personal information such as check stubs or bank statements will not be contained in CSFP client folders. Participants must self-certify they meet the established income guidelines.
- 4. Participants must reside in the county in which they receive benefits. If participants move from one of the CSFP counties to another, they are allowed to transfer their eligibility to the new area until the end of the certification period, assuming CSFP is active in the new area.
- 5. Participants are certified for a period of three years, with verbal check-ins every twelve months to ensure a participant's eligibility status haven't changed and they are still interested in the program.
- 6. Each participant must be provided information concerning other assistance programs available for which they may be eligible at the time of certification, including the Senior Farmer's Market Nutrition Program, along with nutrition education information.

Applicants must be notified in writing within 15 days of the date of application of their eligibility, ineligibility, or placement on a waiting list.

NDA requires local agency distribution staff to check participants, or proxy, identification via government issued ID, benefit cards distributed by CSFP sites to participants, lease agreement, utility bill, etc. Identification can be checked by local agencies one time between certifications and then allowing the use of visual or self-attestation as identity confirmation. This does not change the requirement to verify identity during a certification or re-certification.

5. CASELOAD MANAGEMENT

NDA and its local agency partners will monitor participation levels to ensure participation is maintained as close as possible to the authorized caseload. If a local agency is unable to increase or maintain caseload, they will be instructed to increase outreach activities. In addition, consideration will be given to transfer caseload to another distribution site that has already met their caseload requirements and has potential for expansion.

NDA and its local agency partners utilize outreach measures necessary to achieve maximum caseload utilization, including:

- 1. Monitoring caseload utilization and transfer of caseload slots to another local agency that has already met their goal and has established a waiting list.
- 2. Providing certification and delivery options to meet the needs of homebound participants. It is the local agency's responsibility to identify the homebound participants in the community.
- 3. Increasing public notification through community action agencies, senior centers, newspapers and radio stations.
- 4. In order to achieve maximum caseload utilization, NDA and its local agency partners may expand service to additional service areas.

When a Local agency exceeds the allocated caseload, and there are no available caseload slots to be transferred from another local agency, the local agency will be instructed to establish a waiting list of eligible participants. Persons attempting to enroll will be notified in writing within 10 days of application that a waiting list exists and that positions will be filled from the waiting list on a first come-first serve basis.

6. NUTRITION EDUCATION PLAN

Local agencies are responsible for providing nutrition education to CSFP participants. Local agencies must provide nutrition education that can be easily understood by participants and is relevant to their nutritional needs and household situation. At a minimum, information is presented in the form of a flyer included in the monthly CSFP distribution. Local agencies are encouraged to use nutrition education sources design for older adults when compiling nutrition education materials. NDA and its local agency partners will evaluate the effectiveness of the nutrition education activities every two years by collecting feedback from participants in the form of a survey. The following links are a good source of nutrition education material for older adults. Local agencies may also produce their own materials or procure materials from another source.

ChooseMyPlate.Gov

- https://www.choosemyplate.gov/older-adults
- Nutrition.gov For Older Individuals
 https://www.nutrition.gov/subject/life-stages/seniors
- <u>SNAP-Ed Connection</u>
 https://snaped.fns.usda.gov/materials/search?f%5b0%5d=field_material_information%253Af
 ield rf em format%3A992&f%5b1%5d=field snap ed intervention chann%3A6

7. STORAGE AND DISTRIBUTION OF USDA FOODS

NDA operates two state-level warehouses, one in Reno and one in Las Vegas, and partners with the Las Vegas Ice and Cold Storage facility in Las Vegas to store refrigerated items. Shipments of USDA Foods are received at the two state-level warehouses, the Food Bank of Northern Nevada (FBNN), and Las Vegas Ice and Cold Storage. These facilities further distribute food to the local agencies, which certify and provide food to CSFP clients. To minimize shipping costs, NDA may combine shipments of NSLP, NSIP, TEFAP and CSFP foods whenever possible.

Local agencies and warehouses must provide safe storage and control of USDA Foods that protects against theft, spoilage, damage, or other loss. USDA Foods must be stored in a manner that allows them to be distinguished from other foods and tracked in a separate inventory system. NDA and local agency partners will maintain an ongoing inventory of all products received and distributed. Inventory reports are submitted monthly to NDA and will provide information detailing products on hand, received, distributed and remaining amounts. Local agencies and warehouses must maintain an inventory no greater than the amount needed to distribute full CSFP benefits for three months.

NDA State warehouses will store and deliver CSFP USDA foods to two Local Agencies. The Elko Senior Center will receive a monthly delivery from our Reno warehouse. This delivery will be combined with our USDA School Foods delivery. The Just One project will receive weekly deliveries from our Las Vegas warehouse. CSFP administrative funds will be used for these expenses. Due to the frequency of delivery and storage of USDA Foods the State will retain, with USDA FNS Approval, up to \$60,000 for warehousing costs and \$30,000 for administrative costs, not to exceed a total of \$90,000.

Local agencies must issue CSFP benefits to eligible participants every month in accordance with the Food Package Guide Rates established by FNS.

8. MANAGEMENT EVALUATION AND REVIEW

Local agency reviews are the responsibility of NDA and cannot be delegated to another agency. NDA conducts on-site reviews of each local agency with which it has an agreement at least once every two years. Reviews cover all aspects of program administration, including certification procedures, nutrition education, civil rights compliance, food storage and distribution practices, inventory controls, and financial management systems. NDA evaluates program administration on an ongoing basis by reviewing financial reports, audit reports, food orders, inventory reports, and other relevant information. If a deficiency is noted during a review, NDA will provide the local agency with a written report outlining required corrective actions. The local agency must provide

documentation of correction to NDA within 30 days of the date of the review. If necessary, NDA may perform a follow-up visit to ensure adequate correction.

9. SERVING THE HOMEBOUND PARTICIPANTS

Local agencies are required to meet the needs of homebound participants. They are encouraged to coordinate efforts with the sub-distributing agency and the homebound participants. Local agencies work to identify potential homebound participants, and conduct outreach, certification and delivery of food packages. A proxy may also be designated to pick up food packages on behalf of a homebound participant.

10. OUTREACH PLAN

Outreach activities are conducted by local agencies which must provide information about CSFP to all segments of the eligible elderly population. Local agencies are encouraged to develop outreach flyers. Local CSFP agencies are encouraged to work closely with the Area Agencies on Aging in their areas to market the program. Local Agencies use outreach flyers at social service outlets, medical offices, hospitals, social security offices, senior citizen centers, churches, and unemployment offices when caseload is available.

11. NUTRIONAL RISK CRITERIA

NDA considers the state of being low income a sufficient nutrition risk criterion for individuals applying for CSFP benefits.

12. DETECTION OF DUAL PARTICIPATION

CSFP participants may only receive CSFP benefits once per month. Local agencies are required to establish safeguards against dual participation at more than one CSFP site in the same month by establishing procedures that identify participants who are participating in two different sites or by establishing specific service areas for each distribution site.

13. FINANCIAL MANAGEMENT

Administration of USDA funds for CSFP will be processed through the State of Nevada's Financial Reporting System. Local agencies will complete a reimbursement claim form order to receive compensation for allowable costs per Federal regulation. Local agencies will be required to submit supporting documentation to maintain cost equal to their CSFP budget authority. All Local agencies must sign a State of Nevada Department of Agriculture, Food & Nutrition agreement of program terms prior to the release of any funds.

An allowance based on projected administrative costs is withheld by NDA to the limit that is permitted by USDA. Being that certain local agencies are space-limited and unable to accept direct USDA shipments to their sites, the State Warehouse shall provide commodity storage for, and

delivery to, these local agencies on a consistent basis. As a result, NDA may retain more than the normal authorized administrative share to cover State warehousing and delivery costs in affected areas. The remaining administrative funds are allocated to the local agencies based on the total caseload served by each agency. Agencies are notified of the amount of allocation by NDA following notification from USDA of the total administrative funds allocated to the State. Each local agency may claim expenses directly related to the operation of the CSFP up to the amount allocated. Each local agency must certify that there is documentation on file to support the amount of the claim. NDA will review financial expenditures during on-site reviews of the local agencies.

Local Agencies shall provide an accurate, current, and complete disclosure of the financial status of the program including an accurate accounting of all administrative funds received and expended on a monthly and/or quarterly basis, or as requested by the SA or USDA-FNS.

14. AUDITS

As needed, Local Agencies will comply with Office of Management and Budget, Circular A-133. Findings and corrective action must be documented and completed within the required time frames. Audits are maintained on file for 3 years.

15. CIVIL RIGHTS

All activities carried out under this plan adhere to the requirements of the Civil Rights Act of 1964 and current FNS Instructions. Assurance of compliance is in the contract for local agencies.

Local agencies must provide program information translated into the major non-English languages prevalent in their service areas.

The nondiscrimination statement is included in all program announcements and on certification forms. "And Justice For All" posters must be posted at certification and distribution sites.

At the time of certification each applicant will be provided with information describing the discrimination complaint procedures. Participants have the right to file a discrimination complaint directly to the USDA Civil Rights Office:

United States Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Ave., SW Washington, DC 20250-9410 Fax: (202) 690-7442

Local agencies will be reviewed by NDA for compliance with civil rights regulations. The review will include the following measures:

1. Do all persons have an equal opportunity to participate in the program regardless of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status?

- 2. Is racial/ethnic data being maintained on file for three years?
- 3. Is program information being provided to applicants, participants, and grass roots organizations or similar minority groups?
- 4. Is the "And Justice For All" poster and all other relevant information displayed in all program areas?
- 5. Is the nondiscrimination statement included on all printed materials such as applications, pamphlets, forms, or any other materials distributed to the public?

16. STANDARDS FOR PURSUIT OF A CLAIM

If a CSFP participant is found to have improperly received benefits, either by misrepresenting income eligibility or receiving benefits from multiple sites in the same month, a claim may be issued to recover the value of food. NDA has determined that pursuit of a claim against a participant to recover the value of USDA Foods improperly received or used is cost-effective when the value of the foods received exceeds \$100 or 4 months of CSFP benefits. In determining the value of USDA Foods, local agencies should use the USDA purchase price available in WBSCM. Local agencies are required to use this standard in determining if a claim against a participant is cost effective, in accordance with 7 CFR § 247.30.

17. FAIR HEARINGS

A right to an appeal and a fair hearing is provided to those applicants who contest a denial of certification or who have areas of concern regarding the food program. An appeal can be made orally or in writing to the local agency. The panel consisting of representatives from NDA and the local agency shall conduct an appeal review. All fair hearing procedures will comply with the requirements of 7 CFR § 247.33.