January, 2025

WIC /TEFAP Division

The Emergency Food Assistance Program (TEFAP) Manual 2025

Indiana Department of Health

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Section 1: Introduction

PURPOSE

The Manual contains information about The Emergency Food Assistance Program (TEFAP) policies, rules, and regulations for Eligible Recipient Agencies (ERAs) and their food outlets (food pantries, soup kitchens, domestic violence shelters, or unhoused shelters).

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: USDA Civil Rights Complaint Form, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or

2. **fax:**
   (833) 256-1665 or (202) 690-7442; or

3. **email:**
   program.intake@usda.gov

This institution is an equal opportunity provider.

TERMS, DEFINITIONS & ACRONYMS

The following is a list of federal, state and local terms, acronyms and definitions used throughout the manual.

ADA – American with Disabilities Act of 1990. Title III of the Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from our country's businesses and services and to afford our businesses and services the opportunity to benefit from the patronage of all Americans. To receive an ADA compliance checklist, contact you Disability and Business Technical Assistance Center. To be automatically connected to your regional center call 1-800-949-4ADA.

Choice – Allows recipients to choose from all the food products and non-food products that are available in a pantry. These choices may have limitations on particular products and the number of allowable items may vary because of the availability of products. Different forms of recipient choice are allowable based on space restrictions.

CFR – Code of Federal Regulations. Contains regulations governing federal programs. 7 CFR 250 and 7 CFR 251 govern The Emergency Food Assistance Program.

DFR – Division of Family Resources, formerly known as the Welfare Office.

Domestic violence shelter – A facility that houses individuals or families that are, or have been, victims of domestic violence, offering room, board, and ancillary services.

ERA – Eligible Recipient Agency. An agency that has entered into an agreement with IDOH to administer the distribution of USDA Foods within their service area.

Food bank – a public or charitable institution that maintains an established operation involving the provision of food or edible commodities, or the products of food or edible commodities, to food pantries, soup kitchens, hunger relief centers, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to feed needy persons on a regular basis.

Food outlet – A physical location where food and/or non-food products are given to an eligible recipient. A food outlet may be a food pantry or soup kitchen. A food outlet may not be a private home or a for-profit entity.

Food pantry – a public or private nonprofit organization that distributes food to low-income and unemployed households, including food from sources other than the Department of Agriculture, to relieve situations of emergency and distress.

FFY – Federal Fiscal Year. A twelve-month period used for accounting and reporting purposes. The Fiscal Year for TEFAP is October 1 through September 30.

FNS – Food and Nutrition Service. A Division of the United States Department of Agriculture responsible for nationwide administration of several federal nutrition programs including TEFAP.

Unhoused shelter – A facility whose primary purpose is to provide temporary or transitional shelter for the unhoused in general, or for specific populations of the unhoused.

HH – Household. A group of related or non-related individuals living as one economic unit who buy and cook food together or a single individual living alone.

IDOH – Indiana Department of Health. The state agency responsible for administering TEFAP in the state of Indiana.

OSR – Order Status Report. A WBSCM report detailing USDA Food orders.

Soup kitchen – A facility that offers a prepared meal in a clean and secure environment without charge to recipients. Soup kitchens serve prepared nutritious meals in a congregate setting or take-home prepared meal(s) without charge, for unhoused persons, transient persons and/or others in need. Kid's Cafés are considered soup kitchens for TEFAP purposes.

State Agency (SA) – the State government unit designated by the Governor or other appropriate State executive authority which has entered into an agreement with the United States Department of Agriculture under § 251.2(c).

TEFAP – The Emergency Food Assistance Program. The federal title of one of the programs for distribution of USDA food products in the United States.

USDA – United States Department of Agriculture. The cabinet level agency responsible for federal aspects of TEFAP and other federal agriculture and nutrition programs.

USDA Foods– Dry, refrigerated and/or frozen food products that are made available to the State Agency by the United States Department of Agriculture.

Introduction

Section 2: Eligibility

FEDERAL REGULATIONS

USDA regulations require that states set standards for determining the eligibility of households to receive USDA food products through TEFAP. Standards must be based on income and household size. Federal regulations allow state standards to include a requirement that the household live in the state, but length of residency in the state cannot be considered when determining eligibility.

STATE REQUIREMENTS

In Indiana, IDOH sets income eligibility standards for participation in TEFAP at 185% of the federal poverty levels for households and the method of income verification used is self-declaration. If a recipient self-attests their household income is at or below 185% of the current federal poverty income guidelines for their household size, provides their name, city, county, and household size, and they have lived in Indiana for one day, they are eligible for food. No other eligibility requirements shall be imposed on individuals seeking food assistance through TEFAP.

Eligibility Certificates are available in individual, aggregate, and mobile pantry formats in English, Spanish and Burmese. ERAs have discretion to specify that pantries within their service area shall use only individual or only aggregate eligibility certificates.

All outlets shall serve any qualifying individual or household who resides in Indiana. Outlets shall provide recipients with a list of other TEFAP outlets that may be more convenient for the recipient's location.

When establishing a recipient to receive food, outlets shall require only the following data items:

- Name
- City
- County
- Household size
- Self-attestation of income

Many outlets participate in Feeding America and that program requests breakdown of household members by age. This is not a TEFAP requirement. Many outlets also seek grants. As a singular accommodation to those needs, IDOH incorporated optional data, as determined by the TEFAP Policy Workgroup, into Eligibility Certificates (number of household members by age range, veteran status, race, ethnicity, and employment). Therefore, no additional optional data shall be collected during TEFAP distributions.

This data may only be shared as anonymized and aggregated data and only as required by other agreements the outlet may have in place with other entities.

In no case shall TEFAP recipients' personally identifiable information for TEFAP be shared with any entity that is not a party to the grant agreement nor with any other program.

In general the following entities or persons may have access to TEFAP recipient data:
USDA
IDOH WIC TEFAP staff
ERA TEFAP staff
Outlet staff providing TEFAP services to the recipient ***when access would deny appropriate service***

Data required for other programs administered by the outlet shall be acquired during those other programs' intake processes and separated in time and/or space from TEFAP activities. TEFAP data shall not be combined with data from other programs and shall remain separate and confidential.

All recipients shall be served no less than once in a thirty (30)-day period. It is preferred that recipients be served at least twice in a thirty (30)-day period. Eligibility shall be established at each visit using an Eligibility Certificate. If an outlet serves households more than once in a thirty (30)-day period, the outlet shall put in place a mechanism, such as an electronic spreadsheet, to determine visit frequency.

Outlets may set up recipient files in paper or electronic format. Such files shall consist of only an Eligibility Certificate that contains the recipient's name, city, county, household size and approved optional data they choose to provide; Proxy Statement(s) and accompanying proxy notes; or electronic records containing the same information such as spreadsheets, databases, or scanned documents. When Eligibility Certificates are not used, the data must be stored in such manner as to be easily and readily related to the eligibility guidelines in place at the time of service.

Outlets may not request proof of residency. Such proof is prohibited by the "Food Distribution Programs: Improving Access and Parity Final Rule effective December 30, 2024."

No additional information may be requested nor required. If a recipient refuses to establish residency or is unhoused, the city and count of the nearest unhoused shelter or DFR office may be listed as that of the household.

Foster Children

Foster children shall be considered as a household of one (1) with zero (0) income.

Prohibited Data Collection

Outlets shall not request any data other than that listed on state-provided Eligibility Certificate forms. Referrals shall not be requested nor required. Appointments shall not be requested nor required.

UNHOUSED RECIPIENTS

Anyone entering a soup kitchen is deemed to be a resident and eligible to receive a meal. Unhoused recipients may use the city and county of the nearest DFR office or shelter to access food pantries.

INCOME LIMITS

Gross monthly household income shall be at or below the standards listed on the current TEFAP Income Guidelines poster. New income guidelines are issued each year and become effective July 1.

Income Inclusions

All sources of income for each and every member of the household shall be included. Gross household income includes all wages, pensions, Social Security, Supplemental Security Income, Railroad Retirement, income from rental or leased property, interest or dividends from savings, certificates of deposit, stocks, bonds and income from all other sources including, but not limited to, strike benefits, unemployment compensation, alimony, child support, veteran's benefits and regular insurance or annuity payments.

Income Exclusions

SNAP benefits (formerly known as food stamps) are not considered as income.

PROXY STATEMENT

A Proxy Statement is used to allow a food outlet to serve homebound or working recipients and persons with disabilities. *See Attachment A*. Proxy Statement forms are available in English, Spanish and Burmese.

When a proxy is used:

- A Proxy Statement shall be properly completed by the recipient designating the presenter as the recipient's proxy.
- By completing a Proxy Statement, a recipient attests to income eligibility.
- A proxy shall be required to provide ID to prove they are the person designated as proxy to receive food products for the recipient.
- A proxy shall provide name, city, county, and household size of the recipient when requesting food.

- When a recipient has designated a permanent proxy, a Proxy Statement or note shall be attached to the recipient's Eligibility Certificate ***at each visit***. A note may only be used if a recipient has a valid Proxy Statement, with current income guidelines, on file.
- When a recipient has designated a temporary proxy, a Proxy Statement or note shall be presented for each issuance of food. When a recipient has designated a permanent proxy, no additional Proxy Statement nor note shall be required.
- A new Proxy Statement shall be completed if any household information changes, if the Proxy Statement form has changed, and annually concurrent with updated Eligibility Certificates.

It should be considered that some recipients may not be able to read or write. Outlet staff and volunteers shall be prepared to assist recipients by helping them properly complete forms and by explaining criteria.

ERAs have discretion to specify that pantries within their service area shall use only new Proxy Statements at each visit or to allow the use of handwritten notes between annual Proxy Statements when a proxy is designated as permanent.

Section 3: Administration

FEDERAL

The Emergency Food Assistance Act of 1983 authorized The Emergency Food Assistance Program (TEFAP) for all the states. The Food and Nutrition Services (FNS) of the United States Department of Agriculture (USDA) has oversight of the program. There is no guarantee that TEFAP will always be re-authorized by Congress.

STATE

As of July 1, 2009, the Indiana Department of Health (IDOH) is responsible for TEFAP administration. Indiana contracts with not-for-profit food banks to provide warehousing and distribution of food products within the state of Indiana. If direct shipping is not feasible, IDOH may contract with private and/or not-for-profit warehouses to provide storage and transportation services to ERAs.

Section 4018 of the Agriculture Improvement Act of 2018 (the "Farm Bill") changed State Plan requirements outline in Section 202A(b) of the Emergency Food Assistance Act of 1983 (EFAA) and took effect December 20, 2018. Under the new Section 202A(b)(6) of EFAA, the State Plan shall describe a plan that provides emergency feeding organizations or eligible recipient agencies within the state with an opportunity to provide input on the commodity preferences and needs of the entities.

IDOH purchases USDA foods based on an ERA consensus that prefers proteins, fruits, and vegetables. IDOH and ERAs hold monthly virtual meetings and an annual conference to discuss program changes, issues, needs, and to share best practices, successes, and feedback. Additional telephone conferences and/or email conversations occur with the TEFAP Policy Workgroup as needed to solicit input from ERAs on program operations.

LOCAL

IDOH effects grant agreements with ERAs to administer local distribution and storage of USDA Foods. Every ERA effects Memoranda of Agreement (MOAs) with food pantries and soup kitchens to distribute USDA Foods. Only soup kitchens or food pantries that have a 501(c) 3 not-for-profit status, operate a recipient choice model, and are open to the public may participate in TEFAP. ERAs may choose to enter into agreements with local government entities such as township trustees. Local government entities are not required to possess 501(c) 3 not-for-profit status documentation. Nationally recognized churches are deemed to be non-profit entities.

ERAs are encouraged to educate outlets that USDA Foods issued through TEFAP are supplemental, that USDA Foods remain the property of USDA until given to a recipient, and to request that outlets

offer purchased or donated food as part of the Recipient Choice pantry model. IDOH understands there is an ebb and flow to the nature of donations. USDA TEFAP Foods may not be the sole source of food in TEFAP outlets.

Unhoused shelters and domestic violence shelters grandfathered into the program may remain on the program if they are continuously compliant and have a valid MOA. If at any time an unhoused shelter or domestic violence shelter leaves the program, they may not reapply. Current rules and regulations do not allow participation of unhoused shelters or domestic violence shelters.

ERA requirements:

- Complete an IDOH Request for Application to the State for review.
- Be a local governmental agency or a non-profit organization. *(Proof of non-profit status may be supplied by providing a copy of the 501(c)3 tax-exempt status designation letter from the Internal Revenue service, a determination later from the State of Indiana, or a current federal tax return as a tax-exempt entity.)*
- Submit a copy of a current Certificate of Existence from the Secretary of State.
- Provide a copy of an Agreement with a Storage Facility (if applicable).
- Have access to the internet, email, and Microsoft Office programs – Word and Excel – for receipt of information electronically from IDOH.
- Ensure all TEFAP policies, rules and regulations are applied and that outlets wishing to participate in TEFAP comply.

A map of current ERAs and service areas is provided at the end of this manual and on the IDOH website. *See Attachment C.*

FEDERAL ALLOCATION

USDA-FNS notifies IDOH of USDA Foods availability and quantity. IDOH submits food orders to USDA-FNS via USDA's Web Based Supply Chain Management (WBSCM) system. USDA-FNS makes every effort to fill orders as requested. Because of unforeseen circumstances, USDA-FNS may occasionally eliminate or substitute products or change delivery dates. IDOH orders product based on entitlement allocation of dollars set by USDA-FNS.

Bonus product may be offered to each state based on the federal allocation. Bonus USDA Foods vary and are free of charge to the state.

STATE ALLOCATION

USDA-FNS utilizes a formula based on sixty (60%) of state poverty and forty (40%) of state unemployment to allocate products and funding. Each state receives its fair share of food and funds according to the formula.

IDOH allocates product by using the same formula on a county basis to determine each county's fair share by totaling all counties in each ERA's geographic service area. Adjustments may be made if food product is available, based on the amount utilized in each ERA area and for disaster situations such as flooding and tornadoes.

The value of all USDA Foods provided to ERAs is reported to Indiana State Board of Accounts quarterly in a Non-cash Assistance Report.

LOCAL ALLOCATION

IDOH provides ERAs with county percentage allocations. ERAs shall ensure each county within the service area receives its fair share of each shipment. ERAs determine, within each county, individual outlet allocations.

If outlets within a certain county are unable to distribute a particular product in a timely fashion, the ERA may request that IDOH allow reallocation across county lines. Each request is evaluated and decided on a case-by-case basis.

Section 4: Management Evaluations & Reviews

GENERAL PROGRAM REQUIREMENTS

The purpose of the monitoring process is to evaluate program operations, review record keeping procedures, and ensure health and safety standards are maintained. Monitoring visits provide an opportunity for all parties to ask questions, discuss concerns, and make suggestions about the program.

IDOH recommends that on-site monitoring reviews of food outlets be unannounced. However, ERAs may choose to schedule monitoring reviews. USDA and IDOH may visit any ERA and/or food outlet unannounced. ERAs should make outlet staff and volunteers aware of TEFAP policies and procedures and instruct outlets to provide access to records and facilities to ERA staff, IDOH staff and/or USDA monitoring staff.

Monitoring reviews may include, but are not limited to, the following areas: eligibility determinations, storage and warehousing practice, inventory controls, approval of distribution sites, reporting and recordkeeping requirements, and civil rights. ERA reviews also include financial management.

IDOH may alter or amend monitoring requirements and processes in order to protect the public health.

REVIEW SCHEDULES

IDOH Management Evaluation

IDOH shall review a minimum of twenty-five percent (25%) of ERAs each fiscal year starting October 1st with completion by September 30th of the fiscal year. Each ERA shall be reviewed no less than every four (4) years and may be reviewed more frequently based on IDOH risk assessment.
**7 CFR 251.10(e)(2)(i)*

IDOH Outlet Review

IDOH shall review a minimum of ten percent (10%) or 20, whichever is fewer, of all ERAs outlets each fiscal year starting October 1st with completion by September 30th of the fiscal year.
**7 CFR 251.10(e)(2)(ii)*

ERA Outlet Review

If an ERA has twenty (20) or fewer outlets within its jurisdiction, the ERA shall monitor all of them each year. If an ERA has more than twenty (20) outlets within its jurisdiction, the ERA shall monitor fifty percent (50%) of the outlets each year so that all outlets are monitored at least every two (2) years.

IDOH and ERAs shall maintain documentation of reviews, outcomes, timelines, corrective actions, and resolutions for three years plus the current federal fiscal year.

ERA MANAGEMENT EVALUATIONS

IDOH shall review the following areas:

- Tax-exempt status
- Proof of insurance
- Grant agreement compliance
- Required records
- Equipment maintenance
- Temperature logs
- Pest control
- Cleaning
- Distribution and delivery
- Inventory
- Appropriate administration
- Outreach documents (such as placing notices in local newspapers, posters, pamphlets, websites or help lines as well as 211)
- Required review of outlets
- Completed review documentation
- Outlet files
- Correct execution of Memoranda of Agreement
- Annual outlet training
- Site selection process and area assessment
- Distribution
- Product accountability
- Commodity loss
- Storage and warehousing practices (including refrigerators and freezers)
- Inventory controls
- Expenditures for claims
- Allowable costs
- Traceability of costs, claims, and expenditures

OUTLET ASSESSMENTS

The reviewer (IDOH or ERA) shall review the following areas, including but not limited to:

- Tax-exempt status
- Proof of insurance
- Memorandum of Agreement
- Required records
- Equipment maintenance
- Temperature logs
- Pest control
- Cleaning
- Proxy forms *(with notes, if applicable)*
- Eligibility records
- Appropriate administration
- Compliance with the rules and regulations of TEFAP
- Training (TEFAP and civil rights)
- Outreach documents
- Required postings
- ADA compliance
- Eligibility determination
- Product accountability (all documents on site three (3) years plus current year, including donation sheets, eligibility records, Proxy Statements, loss/damage documents, etc.)
- Commodity loss
- Storage and warehousing practices (including refrigerators and freezers)
- Inventory
- Discrimination complaints
- Prohibited activities
- Recipient Choice

The Review

The reviewer shall –

- Review all elements listed at the beginning of this section.
- Document review results in:
    - TEFAP Outlet Assessment Form
    - TEFAP Outlet Assessment Form Attachments
    - Inventory Worksheet
    - Temperature Record
    - Eligibility Accountability
- Immediately address any major findings *(examples: freezer/refrigerator out of service; outlet unsafe for recipients; unable to locate food product)*.

The outlet shall –

- Supply requested documents during the review.
- Answer questions posed by the monitor during the review.

Findings and Corrective Action (IDOH Review)

If there were findings, the reviewer shall –

- Document findings, recommendations, and corrective action on "TEFAP Outlet Review Indicator Sheet". *See Attachment T*.
- Deliver the findings document to the appropriate ERA within thirty (30) calendar days of completion of the review.

The ERA shall -

- Send a copy of the Indicator Sheet to the outlet.
- Manage the outlet's corrective action, document it, and ensure completion within thirty (30) days.
- Upon completion, submit a copy of the final Indicator Sheet to IDOH and file the final Indicator Sheet and review forms in the outlet file.

Findings and Corrective Action (ERA Review)

If there were findings, the reviewer shall –

- Document findings, recommendations, and corrective action on "TEFAP Outlet Review Indicator Sheet". *See Attachment T*.
- Deliver the findings document to the appropriate outlet within ten (10) business days of completion of the monitoring review.
- Coordinate and ensure completion of corrective action activities at the outlet.
- Ensure completion of corrective action by the outlet within thirty (30) calendar days, and document satisfactory completion of corrective action(s) on the Indicator Sheet.
- Upon completion, file the updated Indicator Sheet and assessment forms in the outlet file.

The outlet shall –

- Perform all necessary corrective actions.
- Document corrective actions on the Indicator Sheet.
- Return the updated Indicator Sheet to the ERA within the time frame specific by the ERA.

Closeout (IDOH Review)

If there were no findings during the review, IDOH shall provide a written close-out statement to the ERA within thirty (30) days of completion of the review. Any recommendation shall be indicated.

If there were findings during the review, and corrective actions are completed to IDOH satisfaction, IDOH shall provide written confirmation that the ERAs supervision of corrective action is acceptable by closing each finding on the Indicator Sheet and sending the ERA a final copy as a PDF document.

Closeout (ERA Review)

If there were no findings during the monitoring review, the ERA shall provide a written statement to the outlet within thirty (30) calendar days of the completion of the review. Recommendation shall be indicated.

If there were findings during the review, the ERA shall close out the Indicator Sheet and provide a copy to the outlet within thirty (30) calendar days of receiving satisfactory confirmation from the outlet, on the Indicator Sheet, that the outlet has completed all corrective actions.

ERA ANNUAL SELF-REVIEW

7 CFR 250.14(c) requires that all distributing agencies and sub distributing agencies conduct annual reviews of their storage facilities, document their compliance with this section, perform and document corrective actions in cases of noncompliance, and provide proof of compliance with this section to IDOH. IDOH provides a form for the review. *See Attachment R*.

The Review

The reviewer shall –

- Perform and document a physical inventory of the storage facility.
- Compare the physical inventory to the book inventory.
- Calculate any discrepancies
- Submit the report to IDOH
- Retain review records for three years plus the current federal fiscal year.

Section 5: Responsibilities

ERAs that have grant agreements with IDOH vary in size and scope of operation, but all are required to meet certain obligations.

SELECTION OF FOOD OUTLETS

ERAs shall develop a system for organizations to apply to participate as a TEFAP outlet. ERAs shall physically inspect potential food outlets. ERAs may give preference to outlets with larger capacity, more frequent hours of operation, more convenient days and hours of operation for recipients, a wider service area, and/or those that allow recipients to receive food more often.

ERAs shall consider the following criteria for food outlets to receive USDA Foods:

- Established and in operation for a minimum of two years *(exceptions are reviewed by IDOH on a case-by-case basis)*.
- Has 501(c)3 status. *(The requirement may be satisfied by one of the following: current federal tax return as a tax-exempt entity, determination letter from the Internal Revenue Service, or determination letter from the State of Indiana.)*
- Operates a recipient choice pantry.
- Physical site meets ADA requirements which include ground level access.
- Established service need in the area where the outlet is located (not in proximity to other outlets operating in the same area).
- Ability and willingness to serve all eligible persons in need of food assistance.
- Ability to properly store and distribute USDA Foods.
- Ability to store USDA Foods in a locked area when the outlet is closed.
- Availability and capacity of dry, refrigerated and frozen storage areas.
- Ability to maintain required records and submit records on a timely basis.
- Ability to take temperature reading of dry, refrigerated and frozen areas a minimum of once per week (more frequently is recommended) and maintain temperature logs.
- Assurance that USDA Foods are included with like items in the pantry.
- Ability to serve recipients a minimum of once every thirty (30) days (twice monthly preferred).
- Agreement to post on the outside of the building the days and hours the outlet is open to recipients.
- Ability to serve recipients a minimum of two (2) hours per month (more hours preferred).
- Ability and willingness to participate in general TEFAP training annually.
- Ability and willingness to participate in civil rights training annually.
- Open to the public, not a private dwelling, and does not make appointments.
- Assurance that no type of mass distribution of USDA Foods will occur.
- Assurance that there will be no repackaging of USDA/non-USDA Foods, other than bagging of bulk produce items.

- Agreement that no money will be exchanged for receipt of USDA and/or non USDA Foods or the appearance of an exchange.
- Soup kitchens must have a current Food Handlers Certification on staff.

ADMINISTERING TEFAP FOODS TO CHILDREN (BACKPACKS OR FAMILY MEAL BOXES)

USDA Foods may be distributed to children through a backpack or similar program using the same guidelines as traditional TEFAP. Prior to a TEFAP ERA providing a child with USDA Foods, the child's household must complete application to and become approved for WIC, SNAP, or NSLP. All applicants are categorically eligible for TEFAP if they participate in WIC, SNAP, and/or NSLP.

ERAs shall maintain accurate records of households served at TEFAP distributions. School or similar agency staff must maintain a list of who has been given USDA Foods through the backpack program and provide this information to the ERA on a regular schedule determined by the ERA.

Each ERA may tailor distribution procedures to the needs of the specific recipient provided that the households have met statewide eligibility criteria. ERAs may choose the frequency in which backpacks or meal boxes are distributed.

Schools or other agencies that distribute USDA Foods to children are not required to conform to the monitoring requirements of traditional TEFAP household distribution sites.

OUTLET AGREEMENTS

IDOH shall issue the Memorandum of Agreement (MOA) form to be used between the ERA and each outlet. *See Attachment B.* All outlets distributing USDA Foods shall sign a Memorandum of Agreement (MOA) with the ERA that serves their area prior to receiving USDA Foods. Only outlets with a Memorandum of Agreement (MOA) may receive and distribute USDA Foods. ERAs shall have the Memorandum of Agreement (MOA) signed and all required documents on file before an outlet may take possession of USDA Foods for distribution. The Memorandum of Agreement (MOA) shall be renewed every two years on or before its date of expiration. MOAs become effective on the date signed by both parties and expire September 30th of even-numbered years ***except when an outlet relocates***. When an outlet relocates the new facility shall be treated as a new outlet and all new outlet procedures shall be followed. USDA Foods may not be moved without ERA approval nor prior to a new MOA becoming effective.

Kids Cafés are considered soup kitchens for agreement and program purposes.

MOAs are not required between ERAs and TEFAP backpack and meal box sites. However, the ERA shall enter into an agreement with a TEFAP backpack or meal box site which specifies the duties of each entity through the duration of the program.

Each outlet shall maintain a copy of the MOA at the site.

IDOH requirements are minimums. ERAs may establish additional outlet requirements as long as such requirements do not conflict with those of IDOH or USDA. For example, ERAs may require outlets:

- Provide operational hours greater than IDOH minimum.
- Serve recipients more frequently than IDOH minimum.
- Report additional metrics.
- Provide specific information to the ERA by specific deadlines.

Outlet Suspension

If an outlet fails to meet requirements established by IDOH and/or the ERA, the ERA may suspend the outlet's participation in TEFAP until such deficiencies are corrected.

If an ERA finds an outlet in violation of health, safety, or food storage and handling requirements, the ERA shall suspend the outlet's participation in TEFAP, immediately remove all USDA Foods from the outlet, and reallocate the USDA Foods to other outlets within the county of the suspended outlet.

Outlet Termination

ERAs and outlets may terminate participation in TEFAP, with or without cause, by providing written notice of termination no less than thirty (30) calendar days in advance of the date of termination.

SCHEDULE OF OUTLET OPERATING HOURS

ERAs shall maintain a current list of the number of meals or households served and the days and hours of operation for each food outlet. Outlets shall have a minimum of two (2) hours established operational hours per month. Evening hours, weekend hours, and frequent and longer service hours are preferred and encouraged. Changes in hours of operation for outlets shall be reported to IDOH using the Outlet Information Worksheet. *See Attachment V*.

PUBLIC OUTREACH

The ERA shall publicize within its service area the regularly scheduled days and times of operation of its outlets. Outlets shall post a sign at the physical location of the outlet which identifies it as a pantry or soup kitchen and displays days and hours of operation during which a recipient may receive food. ERAs and outlets may distribute posters, pamphlets, and newsletters, place notices in local newspapers and free local papers to make potential recipients aware of the availability of food products, and secure Public Service Announcements from local radio and television stations. **Word of mouth may not be used as the sole or primary method of conducting public outreach.**

POSTING GUIDELINES

ERAs shall ensure outlets display the following posters or signs:

- **Income Eligibility Guidelines** – Eligibility Certificates reflect current maximum allowable monthly income for various household sizes. *See Attachment E.* ***(not required for soup kitchens)***
- **"And Justice for All"** – The poster instructs recipients on civil rights and procedures for filing a complaint and shall be displayed where clearly visible to visitors entering the outlet.
- **Household Breaks** – The amount of each type of food a household may receive, of products available, shall be adjusted based on household size and outlet inventory and posted where clearly visible to recipients. ***(not required for soup kitchens)***
- **Hours of Operation** – Hours and days of operation shall be clearly posted on the outside of the building.
- **Written Notice of Beneficiary Rights –** Outlets operated by religious organizations shall display the poster prominently where it is visible when entering the facility. *See Attachment K.*

RECIPIENTS WITH LIMITED ENGLISH PROFICENCY (LEP)

TEFAP staff or volunteers shall read the "And Justice for All" poster and complaint notice for all those who are unable to read.

"And Justice for All" shall be translated for all non-English speaking participants. USDA provides a tool that can be used to determine the primary language non-English-speaking or LEP recipients, the "I speak…" document from USDA. *See Attachment F.*

Agencies that fail to provide services to LEP potentially eligible applicants or participants or deny them access to federally assisted programs and activities may be discriminating on the basis of national origin in violation of Title VI and its regulations.

Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TTY).

In Indiana, for relay (hearing impaired) services call 711 or 1-800-743-3333
http://www.relayindiana.com/

TRAINING AND TECHNICAL ASSISTANCE

General TEFAP training shall be provided to all TEFAP outlets annually. *See Attachment D - FNS instruction 113-1 section XI, and FD-133*. Volunteers and staff with direct recipient contact shall participate in Civil Rights training at the start of their tenure with the ERA or outlet and annually thereafter. All training may be provided remotely via telephone conference, webinar, or via IN TRAIN. Training documentation may be created, stored, and distributed electronically.

Extension Offices should be notified to offer Health and Safety Procedures and any other services applicable for all food outlets. Local County Health Departments (Food Protection) should be invited to outlet training events. Annual training is beneficial in keeping outlets current on policies and procedures. Extension Nutrition Educators may use USDA Foods and other pantry items to prepare dishes and use the recipes for training purposes. IDOH TEFAP staff provide training and technical assistance to ERAs upon request. IDOH provides training modules via IN TRAIN and all relevant program documents via its Commodities SharePoint site.

ERAs shall provide technical assistance to outlet staff and volunteers as needed. ERAs shall direct outlet staff and volunteers to IDOH-provided online, interactive program and civil rights training modules. Training includes, but is not limited to, the following areas:

- Required signage
- Specific requirements of the Memorandum of Agreement and its provisions
- Procedure for receiving USDA food products
- Determining and posting issuance rates and household breaks
- Correct storage procedures
- Procedures for handling donated food
- Procedures for maintaining sanitary conditions
- Reports and record keeping
- Prohibited activities
- Current eligibility guidelines
- Understanding self-attestation of income
- Recipient choice
- Temperature logs
- Public outreach
- Treating recipients with respect

- Civil rights
- Contacting the TEFAP Specialist for assistance with training
- First in, first out (FIFO) storage

Civil Rights Statements

USDA's full civil rights statement shall be displayed on all forms and materials available to recipients. If a material is too small to permit the full statement to be included, the material will, at minimum, include the short civil rights statement "This institution is an equal opportunity provider" in print no smaller than that of the main text.

SHIPMENT OF PRODUCT FROM USDA TO ERA

USDA-FNS allows a maximum of three drops per truck with a minimum of 20% product drop at each stop. ERAs must receive a minimum of 20% of a truck shipment to receive direct delivery.

Vendors or carriers must arrange a delivery appointment with an ERA as far in advance of the expected delivery as possible, but not less than seventy-two (72) hours prior to delivery. An ERA may not refuse delivery but can negotiate a delivery time and date that works for both parties. *See Attachment L.*

Deliveries may not be redirected to any other facility. Deliveries must be received by the facility to which IDOH directed delivery.

In accordance with FNS Inst. 709-5, FNS is to be contacted before any load is refused (the only exception is a load with a missing or incorrect seal) so that FNS may work with the contracting office to determine whether to approve rejection of the load. ERAs should immediately contact IDOH TEFAP staff if there is a concern based on any issue other than seal condition (temperature on arrival, product temperature, unbraced loads, etc.). ERAs shall call IDOH TEFAP staff immediately and be prepared to email the order number, material description, temperature (if applicable), and photos to IDOH TEFAP staff shared inbox. Temperature on arrival (with documenting photos) shall be taken immediately upon opening the truck doors. FNS has provided specific instruction on fresh egg temperatures.

OUT OF CONDITION PRODUCT

Out of condition products are those which appear to have arrived at the ERA's location damaged, contaminated, deteriorated, spoiled, infested, or having latent defects. All USDA Foods shall be inspected upon receipt. Bulging cans or cans with sharp dents or rust on the seams are examples of out of condition products**.**

All products arriving out of condition shall be treated as an emergency and IDOH TEFAP staff shall be contacted immediately for guidance.

All out-of-condition losses shall be reported to IDOH TEFAP staff immediately upon discovery using a Commodity Loss Report form. See *Attachment H*.
Information that is required:

- Recipient agency name
- Recipient agency address
- Contact person
- Contact title
- Contact phone
- Date ERA notified
- Commodity name
- Date product received
- Description of problem or complaint
- Reason for complaint
- Any and all identifying information - contract number, delivery order, N/D number, lot number, box number, can codes, pack date, ship date
- Amount received
- Amount on hold
- Vendor (if known)
- Photos of product

Out of condition product shall be isolated and shall not be disposed without approval and direction from IDOH and/or USDA.

For additional information about warehousing food, refer to 7 CFR 250.14, USDA Handbook 501, chapter VII, and FNS Instruction 709-5. *See Attachments L and U.*

IDOH Staff shall notify ERAs, via e-mail, within twenty-four (24) hours of receiving a FOOD SAFETY ALERT. ERAs shall respond by e-mail confirming the notification was relayed to all food outlets within their respective service areas.

DISTRIBUTION OF PRODUCT

Each ERA shall determine the manner in which distribution to outlets takes place within its service area. An ERA may maintain a warehouse where USDA Foods are held until outlets pick up allocated product. ERAs may deliver USDA Foods from their warehouse to individual outlets, or to a central location in each county in their service area, or a combination of methods. ERAs should bear in mind that a decrease in delivery service may be detrimental to some food outlets and recipients.

ACCESS BY IDOH AND AUTHORIZED AGENTS

USDA requires review of ERAs and outlets receiving USDA Foods. Any ERA or outlet participating in TEFAP shall allow access to program records and operations by IDOH staff, USDA staff or any other authorized governmental agents during normal hours of operation.

MAINTENANCE AND SUBMISSION OF RECORDS

All records shall be maintained for a period of three (3) years plus the current federal fiscal year. All records are subject to review and audit by IDOH and USDA during normal business hours or, upon request, sent to IDOH and/or USDA. For more detailed information refer to Section 11 of this Manual.

INSURANCE COVERAGE

Insurance coverage shall exist to cover USDA Foods loss that occurs because of fire, theft, damage, or another cause. ERAs shall provide liability coverage in an amount at least equal to the value of the average quantity of USDA Foods on hand. The cost of required insurance is an allowable expense. Verification of coverage occurs during each review.

A current Certificate of Insurance shall be on file at the ERA for each outlet as required by the Memorandum of Agreement between the ERA and the outlet. *See Attachment B.* Insurance coverage may be used to cover a commodity loss or, if the ERA/outlet chooses, an alternative funding source may be used. No TEFAP funds may be used to cover a commodity loss.

WBSCM

USDA's Web Based Supply Chain Management (WBSCM) system is an integrated, internet-based USDA Foods acquisition, distribution, and tracking system built on Systems, Applications and Products in Data Processing (SAP) commercial software and an Oracle platform. IDOH orders all USDA Foods allocated to the state by USDA through WBSCM.

Each ERA shall have, at minimum, one manager and one warehouse staff with access to WBSCM. ERAs shall request access from IDOH and follow IDOH instructions for acquiring proper authorization for access from USDA.

Order Status Report

ERAs are responsible for generating an Order Status Report (OSR) on demand. The OSR details items, quantities, requested delivery dates, and status of each delivery IDOH has requested for the ERA. IDOH provides a work instruction for ERAs. *See Attachment N.*

Receipting

ERAs are responsible for accurate receipting of goods received in WBSCM, within twenty-four (24) hours of receiving the goods. IDOH provides a work instruction for ERAs. *See Attachment O.*

Complaints

ERAs shall enter delivery and product complaints in WBSCM once they receive IDOH training and a work instruction. Details of the complaint shall be communicated to IDOH, in writing, when submitting a BOL. Documentation shall include the complaint number assigned by WBSCM.

Responsibilities

Section 6: Storage and Handling

USDA FOOD PRODUCT LIABILITY

When physical delivery of USDA food product is accepted, the receiving entity (ERA or food outlet) assumes responsibility for the safekeeping of product. The entity assumes liability for the value of the food products should a loss occur because of negligence in storage, theft, and/or handling. Although food products are provided without cost by USDA, there is a value assigned to each product that includes USDA's cost of purchasing, processing, and distribution of the food products to states. For current food product values and other product information, refer to WBSCM.

In order to guarantee its quality and safety, each ERA and its food outlets are responsible for proper storage and handling of USDA food products. Premature deterioration of food products is often the result of improper storage conditions and practices. **Every effort shall be made to reduce loss due to spoilage, pest infestation and theft by following accepted warehousing methods.** This action not only ensures the quality of products being distributed but also protects the ERA from claims action by the State of Indiana or USDA to recover the value of the spoiled or lost product.

ERAs and food outlets shall not be held liable for product quality except in cases of negligence on their part. ERAs and food outlets shall be held liable for knowingly distributing food products that are spoiled, especially if the spoilage occurred because of negligence on their part.

GENERAL PRINCIPLES OF FOOD STORAGE

ERAs and outlets shall ensure all food products are held in a secure, adequate, and proper storage facility prior to distribution, in accordance with 7 CFR 250.14(b). Storage shall be rodent and insect free.

ERAs and outlets shall provide facilities for the handling, storage, and distribution of donated food in a manner to protect them from spoilage, infestation, damage, or other condition that may jeopardize the wholesomeness or safety of the food.

Food storage areas shall provide protection from weather, fire, theft, and pests. Aisles between pallets shall be wide enough to provide easy access for inspection, inventory and pulling of product. All USDA food products shall be stored at the ERA or at a storage facility contracted by the ERA. ERAs and their outlets shall follow standard warehouse and storage practices. Such practices include, but are not limited to:

- Keeping food 6" off floor, stored on pallets, platforms or shelves
- Keeping food 4 inches away from walls to allow good air circulation and pest control

- Food not remaining in storage for a period longer than six (6) months unless authorized by IDOH
- Keeping non-food items separate from food
- Keeping toxic items (soap, bleach, cleaning supplies, etc.) in a separate storage area from food
- Keeping floors, pallets and shelving clean
- Keeping doors, windows, and roofs well sealed to prevent pest entry and water damage
- Maintaining proper temperatures
- Maintaining good pest control
- Having a staff person in charge of pest control that maintains a service log or having a contract with a licensed firm to handle pest control management
- Inspecting and maintaining equipment
- Keeping thermometers in freezers, refrigeration units and dry storage areas
- Maintaining temperature logs

Dry Food Products

Dry food storage shall be:

- Away from direct sunlight
- A minimum of 6 inches off the floor for circulation
- At least 4 inches away from walls for circulation
- A least 2 feet from the ceiling to avoid high temperatures
- In a clean, secure area that is inspected regularly
- In the desirable temperature range of 50°F to 70°F

A thermometer is required in all dry storage areas.

Refrigerated Food Products

Food products requiring refrigeration shall be stored:

- To allow for proper air circulation
- In a refrigeration unit that is clean and inspected on a regular basis
- In the desirable temperature range of 36°F to 40°F

A thermometer is required in all refrigeration areas.

Frozen Food Products

Frozen food products shall be stored:

- To allow for proper air circulation
- In a freezer unit that is clean and inspected on a regular basis
- At temperature of 0° or below

A thermometer is required in all freezers.

Temperature Logs

Wherever USDA foods are stored, temperature readings shall be taken and recorded at least weekly both outside and inside refrigerated and freezer storage, and more often if there is difficulty maintaining the desired temperature. Recording refrigeration or freezer unit set points is not equivalent to taking temperature readings. **Best practice:** temperature of frozen and refrigerated areas is taken daily.

STORAGE GUIDELINES FOR STACKING FOOD PRODUCTS

Basic rules for stacking food products include:

- Stretch wrapping to provide added stability
- Limiting the height of the stack so cases of food on bottom layers will not be crushed
- Cross-stacking cases on pallets to ensure the stack will be sturdy, solid, and will not tip when being moved
- Stacking cases away from potential damage by heat, steam or water

STORAGE AREA MAINTENANCE

An ongoing system of pest control shall be in place. Rodent controls such as traps and glue boards are recommended. Place traps along walls and near doorways, moving the traps monthly.

Poisons shall not be used except by a licensed professional. Prevent rodent infestation by thorough cleaning and maintenance of the warehouse.

A cleaning schedule shall be established that includes the necessary frequency of cleaning for each location. Floors, including under pallets, should be swept and cleaned at least monthly. Floors in high traffic areas require regular cleaning. Areas soiled by spillage or breakage shall be cleaned immediately. Broken pallets shall be discarded and dirty pallets cleaned.

Empty pallets shall be stored apart from food products.

The exterior of the warehouse shall be maintained. The building and grounds shall be inspected regularly for signs of fire hazard, pest infestation, security problems and needed repairs. Garbage, waste, or rubbish shall be disposed of frequently and not allowed to become nesting areas for pests.

STOCK ROTATION

All storage facilities used to store USDA Foods shall practice have documented process to ensure the practice of first in/first out (FIFO). Food shall be stored in a manner that ensures products with the oldest pack dates are used first. Most USDA Foods have a pack date on each case. Pack dates or

lot numbers are also printed, stamped, or embossed on individual cans or containers. In instances where pack dates are not visible, warehouse staff are responsible for ensuring stock rotation occurs, such as marking cases with the date they were received. IDOH staff routinely assess inventory levels to ensure supplies are reasonable and appropriate for distribution activities.

Section 7: Food Outlets

Food outlets are locations at which USDA Foods are distributed to eligible households. TEFAP outlets are food pantries and soup kitchens. Legacy sites such as domestic violence shelters and homeless shelters exist but no new shelters may be added. Private residential facilities and correctional facilities are ineligible to participate in TEFAP.

ACCEPTING AND UNLOADING TRUCKS

Distribution sites in Indiana may receive USDA Foods by various methods. Each ERA determines the method of delivery. The following are different and acceptable examples:

- Outlet picks up USDA Foods at the ERA with an appropriate vehicle and personnel furnished by the ERA or with outlet personnel.
- ERA personnel deliver USDA Foods to the individual outlet in trucks furnished by the ERA.
- ERA makes a delivery for one or more outlets to a designated place at a designated time.
- ERA makes a delivery to each county in their service area (may or may not include the county in which the ERA resides).

ERAs shall account for USDA Foods released to each site. ERAs shall maintain accurate distribution and allocation records. ERAs may generate their own forms containing the following required items:

- Site name and address
- Receipt date
- Products and quantities
- Receiver's signature
- Temperature (if applicable)

Outlets (including migrant pantries) may use volunteers and/or paid staff to unload trucks. Outlets may have income-eligible recipients who are willing to volunteer to help unload. However, unloading the truck may not be made a requirement to receive USDA Foods nor can it be used as an in-kind agreement for volunteers to receive more USDA Foods than they would normally receive. Arrangements may be made with county agencies, Township Trustees, or Police Departments for volunteers performing Community Service. Various service organizations may be willing to help unload trucks, prepare meals, or provide other types of volunteer services.

ERA staff shall ensure USDA Foods totals are accurate. Unloading should be supervised. Damage, shortage, or overage in USDA Foods shall be noted and reported immediately.

STORAGE REQUIREMENTS

All outlets shall provide proper storage facilities for USDA Foods received from an ERA. All outlets shall comply with the same storage and handling regulation that apply to ERAs, including any

directives from USDA, IDOH and the local health department within the jurisdiction where the outlet is located. ERAs and the outlet shall be held financially liable for lost USDA Foods resulting from damage, theft or spoilage caused by improper storage and handling. The MoA signed with the outlet does not relieve the ERA of its contractual obligations to IDOH. The ERA remains responsible for ensuring that outlets under agreement provide proper handling, care and storage of USDA Foods.

Outlets shall conduct their operations in a responsible manner to keep losses at a minimum. Most outlets in Indiana are staffed completely by volunteers. The lead volunteer shall train other volunteers to carefully follow approved storage and handling procedures.

No USDA Foods may be stored in an outlet for more than six (6) months. Outlets in possession of food approaching the six-month deadline shall contact the ERA to transfer product that will not be used or to request permission to retain product past the six-month deadline.

Best practice is to distribute USDA Foods within thirty (30) days of receipt.

For details, see *Section 6: Storage and Handling* in this Manual.

ACTIVITIES UNRELATED TO TEFAP

Activities unrelated to the distribution of USDA foods or meal service may be conducted at distribution sites as long as:

- The person(s) conducting the activity makes clear that the activity is not part of TEFAP and is not endorsed by USDA;
- The person(s) conducting the activity makes clear that cooperation is not a condition of the receipt of USDA Foods for home consumption or prepared meals containing USDA Foods (cooperation includes contributing money, signing petitions, conversing with the person/s);
- The activity is not conducted in a manner that disrupts the distribution of USDA foods or meal service; **and**
- The activity is separated in time and/or space from TEFAP distributions or meal service.

IDOH shall immediately terminate from participation in TEFAP operations any ERA or outlet that distributes or permits distribution of materials in a manner inconsistent with the above unless there is no suitable substitute ERA or distribution site in the area, in which case IDOH shall monitor the subject ERA or distribution site to ensure no further violations occur.

FAITH BASED FOOD OUTLETS

Rights of Religious Organizations Operating TEFAP

FNS and TEFAP/CSFP State agencies, in the selection of service providers, are prohibited from discriminating for or against an organization based on that organization's religious character or affiliation.

- Decisions about awards of USDA assistance must be free from political interference.
- Organizations retain their independence.
- Organizations may use their facilities to provide services without removing religious materials.
- Explicitly religious activities shall be separated in time and/or space from TEFAP activities.

Responsibilities of Organizations Participating in TEFAP

Organizations shall not discriminate against program participants or prospective participants on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

Organizations may not engage in explicitly religious activities as part of TEFAP. This includes activities that involve overt religious content, such as worship, religious instruction, proselytization, or distribution of religious materials.

Organizations shall not require program participants or prospective participants to participate in explicitly religious activities in order to receive TEFAP. If there is an explicitly religious activity that takes place at the outlet, it shall be separate in time or location.

Organizations shall make clear that explicitly religious activities are not endorsed by the USDA.

Organizations shall not use TEFAP funds to support any explicitly religious activities, speech, or materials.

Beneficiary Protections – for more information see Policy Memorandum FD -138: Clarification on Written Notice and Referral Requirements for Religious Organizations. *See Attachment M.*

Written Notice of Beneficiary Rights – Instructions

- Display the "Written Notice of Beneficiary Rights" poster prominently where it is visible when entering the facility.
- Place organization information in the top portion of the poster using a label or handwritten with a marker.
- Provide a list of TEFAP outlets to recipients who want a referral.
- Maintain referral records for four years.

Example Do's and Don'ts for Religious Organizations Operating TEFAP

It is acceptable to…	*It is unacceptable to…*
Have a cross hanging on a wall at the food distribution facility.	Require participants to stand by the cross and recite a prayer prior to receiving USDA foods.
Have a menorah on a table at the food distribution facility during the holiday season.	Refuse USDA foods to participants who do not practice the Jewish faith.
Have a display stand at the front/back of the facility that contains faith-based pamphlets for anyone interested.	Insert faith-based pamphlets in bags or boxes when distributing USDA foods.
Have a pastor or other religious official assist with the distribution of USDA foods.	Force or encourage participants to have a religious conversation with the pastor or official prior to receiving USDA foods.

OPERATIONS

Outlets shall be a public or private organization, governmental agency, or not-for-profit organization with a 501(c)3 tax-exempt status or church affiliation and shall not be a penal institution. The physical facility shall be safe and appropriate for storing and distributing USDA Foods or meals, shall be open a minimum of two (2) hours per month, and shall meet ADA standards.

Soup kitchens that are not homeless and/or domestic violence shelters shall conduct public outreach and serve all recipients. Services may not be restricted to special populations such as the elderly, children, or members. Residential treatment facilities, group homes, and Senior Centers that serve congregate meals do not qualify for TEFAP.

Food Pantries

Food pantries in Indiana operate in a variety of ways. Hours of operation vary widely depending upon the level of need in the area, where the outlet is located, and the resources available to the organization operating the pantry.

Larger pantries should be open several hours a day, Sunday through Saturday or any combination of days and hours. Evening and weekend hours help serve recipients whose jobs prevent them from being served during the week. Small pantries, operating on limited budgets, may operate only one afternoon or one evening a week but must be open at a minimum of two (2) hours per month and days and hours of operation must be regular and standardized. If a pantry has difficulty staffing necessary volunteers, it might help to change operating hours to evenings and/or weekends.

A pantry shall be open to the general community without appointment. The population served by a food pantry shall not be restricted by factors other than income eligibility and Indiana's geographic

border. Pantries shall not restrict an eligible recipient's access to food for more than thirty (30) days from the last date the recipient received service. Pantries shall offer all recipients the same choice of products. Product choice shall not be limited by household size. Recipients unable to visit the pantry during operational hours shall be provided with a Proxy Statement. *See Attachment A.*

Pantries encountering recipients from another state shall communicate it to the ERA. The ERA shall communicate the issue to IDOH. IDOH will work with the recipient's state of residence to ensure adequate access to TEFAP in their area of residence.

Pantries that allow recipients to receive service more frequently than once every thirty (30) days shall put in place a mechanism to track that frequency. Recipients must provide the information for an Eligibility Certificate at the first visit, when any item of household information changes, and when IDOH issues updated income guidelines annually. Recipients may self-attest that all information remains the same at additional visits other than those listed in the previous sentence. Pantries may use IDOH-provided Eligibility Certificates or, subject to ERA and IDOH approval, electronic solutions such as spreadsheets, PantrySoft, or Food Bank Manager.

Electronic systems that allow or require collection of birth dates, social security numbers, names of other household members or other invasive data collection practices are prohibited.

Pantries that serve migrant workers shall be open during hours that support the migrant work schedule. Eligibility Certificates are available in languages other than English.

Commodities are Supplemental

Whatever its size, a food pantry should have the resources to provide recipients with food items other than TEFAP USDA foods. USDA Foods should be used as a supplement and are not considered to be the singular food supply for a pantry. Other sources may include food received from food banks, privately donated food, food drives, or food purchased with monetary donations. All food products, TEFAP and donated, shall be mixed with like items in the distribution area. TEFAP products should be separated in storage areas to simplify inventory management and reviews by USDA, IDOH, and the ERA.

Outreach

Outlets shall post their schedule of operation on the outside of the building. Outreach information can be but is not limited to posters or pamphlets located in laundromats, churches, and grocery or convenience stores in the geographic service area of the outlet.

Local newspapers, radio stations, and television stations may provide public service announcements free of charge.

Word of mouth may not be the sole method of outreach.

Issuance Rates

Household breaks designate how food issuance is adjusted based on household size. Outlets shall establish a minimum of one household breaks (a minimum of two separate household size ranges). Establishing more than one household break is encouraged as best practice. Pantries may adjust household breaks if needed and shall advise the ERA of any change immediately.

Once household breaks are established, food issuance rates for each household size shall be adjusted as needed and based on available inventory by food category.

Pantries shall make every effort to distribute all USDA food items in inventory prior to anticipated receipt of the next delivery from the ERA.

Reports

Pantries shall report monthly to the ERA both number of households served, and number of individuals served. Pantries that allow service more than once in thirty (30) days shall count each visit and not number of unique households. Such reports shall be submitted on the timeline and in the manner designated by the ERA. The ERA may require additional data and/or reports at its discretion.

Soup Kitchens

Eligibility

It is assumed that anyone eating at a soup kitchen is income eligible and no certification or documentation of eligibility is required. The "And Justice for All" poster shall be in plain view of all participants. Serving hours and days shall be posted on the outside of the building so that recipients are aware of serving times.

Storage and Records

Soup kitchens shall abide by storage standards set by USDA, IDOH and the local health department. Soup kitchens shall not collect any information from recipients. Only the actual number of meals served, either by head count or by plate count, is required to be reported to the ERA at least every thirty (30) days and no later than the 10th day of each month.

Food Handling and Meal Preparation

Special food handling requirements for soup kitchens include but are not limited to:

- Use non-porous countertops, preferably stainless steel.
- Disinfect all countertops and utensils (a cold water bleach solution may be used).
- Use new or properly sanitized reusable food storage containers; plastic bags may not be reused.
- All food handlers shall wash hands, wear disposable plastic gloves, and cover their hair with hair nets.
- No smoking is allowed in food preparation area or the eating area.
- Shirt pockets shall be emptied and jewelry that could fall into the food shall be removed.
- Decorative hats shall not be worn.

Food Outlets

- Area shall be free of any type of insect or other foreign matter that could contaminate food.
- Current inspection from local or State Department of Health (if applicable) shall be posted.

ERAs and soup kitchens should contact local public health officials for more information on proper food handling, preparation procedures and standards for soup kitchens.

Food Outlets

Section 8: Commodity Losses

IDOH requires that ERAs explain all losses, including those experienced by their outlets. ERAs shall balance, on a monthly basis, the amount of USDA Foods received, and the amount distributed.

OBJECTIVE

Timely, correct, and comprehensive resolution of any USDA commodity loss in compliance with USDA requirements.

PARTIES

IDOH Food Program	SA
Eligible Recipient Agency	ERA
Outlet	OL

DEFINITIONS

Claim - A demand, or basis for a demand, that restitution be made for the loss of donated foods, or for the loss or improper use of funds relating to donated foods, by the party responsible for such loss.

Claim action - Any action taken to initiate, pursue, or resolve a claim, or to collect and dispose of funds in a claim.

Claim adjustment – A revision of the original amount of the claim indicated in the notification and demand for payment, as a result of further information received.

Claim determination – A determination that a loss of donated foods, or a loss or improper use of funds, has occurred, the value of that loss, the party responsible for the loss (if any), and any other pertinent information.

In-kind replacement – The replacement of a loss of donated food with the same type of food of U.S. origin, of equal or better quality in all USDA procurement specifications as the donated food, and at least equal in value to the lost donated food.

Similar replacement – The replacement of a loss of donated food with another type of food group (i.e., dairy, grain, meat/meat alternate, vegetable, fruit, etc.) that is of U.S. origin, of equal or better quality in all USDA procurement specifications for that type of food, and at least equal in value to the lost donated food.

Commodity Losses

ORIGINATION

At the location of the commodity loss (either SA, ERA, or OL), the SA, ERA or OL shall –

- Completely document the loss on the *"TEFAP/CSFP Commodity Loss Report"* and
- Forward the properly completed document to the SA.

INVESTIGATION

Upon receipt of a properly completed *"TEFAP/CSFP Commodity Loss Report"*, SA shall –

- Immediately investigate the loss to establish:
  - The types and quantities of donated foods lost.
  - The value of the donated foods lost, or the amount of funds improperly used or lost.
  - The date and location of the loss to the extent they can be determined.
  - The cause, including theft, embezzlement, or fraud was involved.
  - The party responsible for the loss, if any.
- Determine the value of the loss, using the USDA purchase price of the food at the time the loss occurred.
- If the value of the loss is more than $500 or the loss is caused by negligence, theft, fraud, embezzlement, willful misapplication, or a failure to comply with the provisions of an agreement or contract,
- Immediately report the loss to FNSRO.
- Determine whether or not a claim action must be pursued. ***(FNS Instruction 410-1, VI.A requires that claim determination must be completed within thirty (30) days of the date of discovery of the loss, or from the date that information was first received indicating that the loss had occurred, whichever is later.)***
- If a claim action is not necessary, because the value of the loss does not exceed $500 OR because the loss did not result from theft, embezzlement, willful misapplication, or fraud, OR because there is no responsible party (as in the case of hurricane, flood, or general power outage),
  - Document the determination,
  - File it electronically.
  - Notify the ERA and/or OL of the determination, in writing.
- If a claim action is necessary because value of the loss exceeds $500 OR the loss resulted from theft, embezzlement, willful misapplication, or fraud, AND there is no statutory nor regulatory requirement that disallows a claim action,
  - Document the determination by checking the appropriate box on the *"TEFAP/CSFP Commodity Loss Report"*.
  - Initiate the claim action,
  - Immediately inform FNSRO of the action.
  - Notify the ERA and/or OL, in writing.

CLAIM ACTION

While FNS Instruction 410-1 may be interpreted to require that funds be collected by the SA and then either used by the SA or disseminated to the appropriate recipient agency or another entity, to purchase replacement food, the process involved is far less feasible than requiring the entity responsible for the loss to procure replacement food, supply proof of same, apply any required corrective action, and report in full on those efforts. Therefore, the SA shall require the entity responsible, either ERA or outlet, to replace commodity losses when claim actions are required.

After completing the claim determination, the SA shall–

- Provide written notification and demand for payment to the party responsible for the loss, including the following information:
    - A description of the loss, including the types and quantities of the donated foods lost and the value of the loss.
    - The date, location, and cause of the loss, if determined.
    - Evidence and documentation relating to the loss, including a certificate of inspection by health officials, as applicable.
    - Evidence of theft, embezzlement, willful misapplication, or fraud, as applicable.
    - A formal demand that the party responsible either (at the SAs discretion):
        - Make a payment to the SA for the full value of the loss of donated foods, or improper use or loss of funds, by a date not to exceed thirty (30) days from the date of the notification and demand for payment, OR
        - Purchase replacement foods.
- Make a claim adjustment, based on additional evidence provided by the responsible party, or obtained from another source, subsequent to the notification and demand for payment, if it is deemed appropriate.
- If a claim adjustment is made, the SA shall notify the party responsible for the adjustment, including any information that formed the basis for the action, and the amount for which the party responsible remains liable. A claim adjustment does not entitle the responsible party to any reimbursement for previous payments made on the claim.
- If payment, or a request for adjustment or other appeal of claim actions, or (if the SA has directed) purchase of replacement foods has not been made after thirty (30) days, send a second notification and demand for payment to the party responsible. The demand must require resolution by a date not to exceed 60 days from the date of the original notification and demand for payment.
- Submit claim actions to FNSRO in the following cases:
    - The SA receives an appeal of claim actions from the responsible party; or
    - The FNSRO directs the SA to submit such claim actions for review.
- Suggest or require corrective actions, either general or specific, as deemed necessary.
- Follow up on corrective action requests.
- Document the closeout of any corrective action.

Commodity Losses

The party responsible (SA/ERA/OL) shall -

- Purchase replacement food in-kind OR pay a claim (if the SA has determined that the purchase of replacement food is not feasible) no later than 60 days from the date of the SA's notification and demand for payment document. If in-kind replacement is not feasible then the replacement must be similar. (See definitions in this section.)
- Furnish to the SA copies of receipts for replacement food along with documentation of the source of the funds used to purchase the replacement food.
- Effect corrective action as directed by the SA.
- Document the corrective action.
- Electronically submit the documentation to the SA.

NOTE: At the time of an on-site review, if ERA or OL has had a loss in the past twelve (12) months that resulted in corrective action, the review shall include a review of all records related to loss. *See Attachment H.*

Section 9: Client Choice

No matter what the income level, recipients should be able to select their own foods and have control over what they eat. This practice is referred to as Client Choice. In Indiana, all pantries that participate in TEFAP are required to provide "Client Choice".

The choice pantry allows families the dignity of choosing their own food. Client choice also helps make the most of USDA foods. Families may choose the foods that they need instead of being given items that they may already have or be unable to consume because of dietary restriction.

IDOH may amend or alter Client Choice to protect public health.

TOTAL NUMBER OF ITEMS METHOD

A simple method for pantries to use when first switching to a client choice model. Each household is given a total number of items to choose. There are no constraints except the available amount of food. For example, shelf tags may read "up to 3 meat items per household" in order to keep enough stock available for the average number of households served monthly by the pantry.

Total number of items method example:

- 35 items to a household of 1-3
- 50 items to a household of 4-5
- 75 items to a household of 6 or more

This method is uncomplicated for volunteers because they only have to count the total number of items for the recipient to bag. Although recipients have complete freedom to choose the foods they want, this setting is ideal for volunteers to provide nutrition education by suggesting food selection.

CHOICE ON PAPER

The least preferred method for providing client choice is to give recipients a list of items and let them choose on paper. A volunteer then pulls the items off the shelf and bags them for the recipient.

There are several disadvantages to this method, especially if the recipient has trouble reading or has limited English proficiency. Client choice is designed to help with the flow of many different kinds of food. If there is a limited selection of items, the list will often be out of date. If a recipient circles green beans and there are no green beans in stock, then either the volunteer chooses an alternative for the recipient or extra time is taken to ask what substitute the recipient would like. Most people prefer to physically touch and choose the foods they want rather than pick from a list.

SAMPLE LIST

Bread items
(Circle 3)
Crackers
Tortillas
Cereal
Rice
Macaroni and Cheese
Chips or Popcorn

Protein items
(Circle 3)
Spam
Chicken and noodles
Stew
Tuna
Peanut Butter
Eggs

Canned fruits/vegetables/juices
(Circle 4)

Green Beans
Orange juice
Grape juice
Tomato juice
Tomatoes
Beets
Peaches
Pears

Free items
(Circle 3)

Bread
Cold Medicine
Soap
Sweet or pastry
Snack items
(Diapers, if available)

Client choice pantry shopping has the unique ability to create a practice shopping experience for the recipient. Many people of all income levels waste precious food dollars by not knowing how to comparison-shop. Even though the recipient is not using actual dollars, he is using points, pounds, or items, and must budget them in the same way as money. This allows the experience of choosing or putting back selected items on the shelf, because it does not fit in the shopping budget. This experience can translate to better use of money or food stamps in the grocery store.

SENIORS AND CHOICE

Seniors may require special consideration when planning a client choice pantry. A client choice pantry can be especially helpful to someone trying to plan a special diet around high blood pressure, cholesterol issues, or diabetes. In addition, extra thought may need to go into the physical space at the pantry to make allowances for physical impairments brought about by aging. Some examples of typical problems experienced by seniors are:

- Items are placed too high on shelves for someone with limited range of arm motion.
- Items are placed too low for someone with back problems or balance issues.
- Baskets or carts may be needed, or at least a table to set items on while choosing grocery selections.
- Special tools such as a grab claw may be useful for items placed high on shelves.

- Frozen items may be preferred over canned items because of the high sodium content of canned items and ease of opening the container. (Joint and hand problems due to arthritis may make using a can opener difficult.)
- Frozen items also allow less food waste for a person living alone as a single serving can be taken out of the package and the rest returned to the freezer.
- Seniors may need assistance to their car or just walking around the pantry.
- Single serving containers are preferred whenever possible to help prevent food waste.

Other considerations for seniors struggling with finances include:

- Offering personal care products at no additional points such as denture cleaner or hair-care products.
- Pet foods should be offered if at all possible since many seniors who live alone will sacrifice valuable food dollars at the grocery store to make sure a beloved pet receives the food it needs.
- Offering some over the counter medicines at one or no points to help conserve grocery dollars for food.

Provide information to seniors at pantry sites about hot meal sites for seniors, home delivered meals, free or reduced priced prescription drug programs, Commodity Supplemental Food Program* (CSFP), Senior Farmers Market Nutrition Program* (SFMNP), and other programs locally available. These are all excellent opportunities for pantry volunteers to interact with seniors visiting the pantry and form lasting relationships with the recipients while making a real difference in the quality of their lives.

*** Not available in all counties.**

Volunteers who make deliveries with the use of a proxy form can easily have an extra box or cooler along with alternate foods to quickly trade apple sauce for peaches, green beans for corn, or a different canned meat. These small changes can boost nutrition for an older person whose appetite is lagging or for whom certain foods do not taste good. It is best to carry along the extra foods, and document exchanges, rather than using a paper and pencil method.

Client Choice

Section 10: Prohibited Activities

SALE OF FOOD PRODUCTS

USDA requires agencies to give food products to eligible households at no charge. Selling food products or trading food products for services is strictly prohibited. Violators are subject to Federal and /or State prosecution.

POLITICAL ACTIVITY

Political activity in any form is prohibited during commodity distribution. Candidates shall not make political appearances during hours of operation or when recipients are at the food outlet. Campaign literature and signs shall not be evident nor distributed. Bags or boxes advertising candidates or political causes shall not be used to carry food products. Staff and volunteers shall not wear buttons or politically inspired apparel.

SOLICITATION AND MEMBERSHIP REQUIRED

Recipients shall not be solicited for contributions and shall not be required to attend, participate, or join the organization distributing the food. Eligibility is based solely on income eligibility and state residency.

FOOD PRODUCTS AS COMPENSATION

Volunteers and staff are entitled to USDA products only if they meet income eligibility requirements. Eligible volunteers and staff shall not be given extra food nor allowed to receive food prior to publicized hours of pantry operation. Issuance rates established by the food outlet shall not be exceeded. Food outlets shall not reserve product from distribution in favor of volunteers.

RE-PACKAGING

Repackaging of any TEFAP USDA foods is prohibited. Bagging of bulk produce such as apples, oranges, and potatoes is not considered “re-packaging”.

DISCRIMINATION

USDA’s Nondiscrimination Statement for use by state and local agencies and their subrecipients for all FNS programs:

Prohibited Activities

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or
2. **fax:**
   (833) 256-1665 or (202) 690-7442; or
3. **email:**
   program.intake@usda.gov

This institution is an equal opportunity provider.

AMERICANS WITH DISABILITIES ACT (ADA)

The potential impact the Americans with Disabilities Act (ADA) may have on not-for-profit organizations has been a concern for many agencies. Unhoused shelters, soup kitchens and food pantries that are covered under Title III of the ADA as "places of public accommodation" and that lease or occupy donated space from a religious organization remain subject to ADA. Accordingly, a distribution site that occupies leased or donated space in a church, synagogue or temple or facilities owned by a church, synagogue or temple is subject to the ADA and Section 504 of the Rehabilitation Act of 1973.

Removal of architectural and structural barriers such as stairs or narrow doorways in existing buildings is required when such removal is "readily achievable", that is when the modifications can be easily accomplished without great difficulty or expense. A variety of factors are considered in making this determination, including the overall financial resources of the organization and the extent of the action required. Also included is the impact of the action on the continued operation of the facility.

If the expense of removing structural barriers will prove too costly for the distribution site, other ways to comply with ADA still exist. Installation of a buzzer or intercom at a stairway would allow the recipient access to the services of the site. Recruitment of additional volunteers to provide home delivery through use of the proxy system is acceptable. "Readily achievable" removal of barriers might include installing grab bars, ramps for steps, adding Braille marking to existing signs, rearranging tables or chairs, or making other modest adjustments.

All of the above can be accomplished with little or no expense to the site. The primary goal should be to allow access to the services provided by the site if access to the facilities cannot be achieved. For information regarding a survey of your facilities and what could be done to make a site more accessible, contact the Disability and Business Center at 1-800-949-4ADA.

CONFIDENTIALITY

The Identity of Persons Making Complaints or Allegations Against Individuals Participating in or Administering the Program

TEFAP regulations at 7 CFR 251.10(c)(3) require State agencies and ERAs to limit the disclosure of the identity of persons making a complaint or allegation against an individual participating in or administering TEFAP. State agencies and ERAs must protect the confidentiality, and other rights, of any person making allegations or complaints against another individual participating in, or administering TEFAP, except as necessary to conduct an investigation, hearing, or judicial proceeding, as applicable.

Prohibited Activities

Section 11: Records and Reports

ERA REPORTS TO IDOH

Excess Inventory Reports

Every six (6) months, in January and July, ERAs shall submit a completed form FNS-155 "Inventory Management Register" listing any and all USDA Foods in inventory longer than six (6) months. Data required includes commodity description, commodity code, quantity in cases, and disposition or comments. *See Attachment S.*

Bills of Lading

Bills of Lading including the following information must be receipted in WBSCM by ERA staff within 24 hours of receipt of delivery. Bills of Lading shall be submitted to IDOH, via email, within two business days of receipt of delivery.

- Date received
- Printed name of receiver
- Receiver's signature
- Confirmation of quantity received
- Seal condition
- Any shortages, overages, damages
- Temperature upon arrival (frozen and refrigerated loads)

Workbooks

IDOH provides a distribution workbook for each shipment received by each ERA. The ERA is responsible for accurately completing the workbook and submitting it to IDOH no later than thirty (30) days after the shipment is fully distributed to outlets. ISDH provides a work instruction. *See Attachment P.*

Distribution Workbook Process

The ERA shall –

- Use the correct distribution workbook to determine distribution of USDA Foods to food outlets (pantries and soup kitchens).
- Submit the completed workbook for each distributed commodity to the SA no later than 30 days after all product from a specific shipment is distributed.

Outlet Information Worksheet

ERAs shall notify IDOH of new, removed, and changed outlet details on the Outlet Information Worksheet form, provided by IDOH. *See Attachment Q.*

Service Statistics

ERA shall provide, no later than the 20th day of each month, service statistics for all active outlets within their service area, for the prior month. IDOH provides a form and work instruction for the purpose. *See Attachment P*.

Food deliveries and/or grant reimbursement may be withheld or reduced if required reports are not submitted within specified time frame.

NOTE: if an outlet allows services more than once per month, each visit counts as a "household" and all household members count at each visit with regard to service statistics reporting. Collecting only unique households and members does not accurately reflect service activity nor service need.

RETENTION OF RECORDS

All records related to TEFAP shall be retained for three (3) years from the close of the federal fiscal year to which they pertain and the current federal fiscal year. ERAs are responsible for proper maintenance and retention of all records required of outlets. Records shall be available for inspection by USDA, IDOH, and/or their designees.

MANDATORY REPORTING OF SUSPECTED ABUSE

The state agency and its grantees are mandatory reporters. If an ERA learns of suspected abuse, they must report it to the authorities. The state agencies encourages ERAs to request their outlets notify the ERA of any suspected abuse.

For minors, they should report the abuse to Child Protective Services (CPS) (https://www.in.gov/dcs/child-protective-services/).

For older adults they should report the abuse to Adult Protective Services (APS) (https://www.in.gov/fssa/da/adult-protective-services/)

Section 12: Public Health Protection

This section applies to allowable alteration of processes in response to public health emergencies as determined by IDOH. IDOH shall notify ERAs of alterations allowed in each situation, the time frame for each allowance, and shall provide guidance on execution.

Process changes shall be temporary in nature, determined by IDOH, and based on the needs of ERAs, outlets, and recipients, and program flexibilities allowed by federal regulations.

Attachments

A	Proxy Statement
B	Memorandum of Agreement for ERA and Food Outlet
C	Map of TEFAP ERAs
D	FNS instruction 113-1
E	Eligibility Certificate
F	"I Speak"
G	LEP Guidance
H	Commodity Loss Report
I	Code of Federal Regulations for TEFAP (7 CFR 251)
J	Outlet Assessment Form
K	Written Notice of Beneficiary Rights
L	FNS Instruction 709-5, Rev 3
M	Policy Memorandum FD-138
N	Work Instruction - Order Status Report
O	Work Instruction - Receipting in WBSCM
P	Work Instruction - Workbooks and Service Statistics
Q	Work Instruction – Outlet Information Worksheet
R	Annual Storage Facility Review Form
S	FNS-155
T	TEFAP Outlet Monitoring Review Indicator Sheet
U	FNS Handbook 501, Chapter 7
V	Outlet Information Worksheet