

**Arizona Department of Economic Security
Hunger Relief Program
2015**



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

The Emergency Food Assistance Program

Arizona Department of Economic Security/Division of Benefits and Medical Eligibility, Hunger Relief Program (HRP) coordinates with various federal, state and local organizations that provide food assistance to the hungry and contracts with various hunger organizations to maximize resources. Among the services provided are food stamp outreach, food bank coordination, food boxes, commodities, coordination in rescuing produce that otherwise would go to waste (also called gleaning) and information on where to obtain food when in need.

Hunger Relief Program administers The Emergency Food Assistance Program (TEFAP) that provides commodities from the United States Department of Agriculture (USDA) for low-income households and congregates meals through contracts with regional food bank warehouses and a statewide food bank organization.

TEFAP provides low-income individuals and households with surplus commodities donated by USDA. DES/HRP enters into agreements with eligible recipient agencies Regional Food Banks to serve as a distribution network for TEFAP.

TEFAP is designed to supplement the nutritional needs of program-eligible individuals and households. TEFAP is not designed to satisfy all hunger needs or nutritional requirements of individuals or households. Program-eligible recipients may receive food through congregate feeding sites, where food is prepared and meals are served in a group setting, or through Distribution Sites, where food is distributed for household consumption.

Acronyms

1. DES – Arizona Department of Economic Security
2. HRP – Hunger Relief Program
3. TEFAP – The Emergency Food Assistance Program
4. RFB – Regional Food Bank
5. FNS – Food and Nutrition Service of USDA
6. USDA - United States Department of Agriculture
7. WIC - Women, Infants and Children Program

(Definitions are located in the TEFAP Policy and Procedures Manual)

TEFAP Distribution Site Standards

- ❖ Food pantries shall distribute food to income eligible households, including food from sources other than USDA/TEFAP to relieve situations of emergency and distress.
- ❖ Food pantries shall maintain regularly scheduled and consistent operating hours for TEFAP distribution and provide emergency access to food.
- ❖ Food distribution must take place at least once per month. However, Distribution Sites should make every effort to be open at least one day per week to ensure households have reasonable access to food.
- ❖ Food pantries shall publicize the days and hours of operation. A sign must be posted at the physical location of the site to identify it as a food pantry.
- ❖ Distribution Sites must post emergency instructions for obtaining access to food when the Distribution Site is not open. This could include instructions for contacting the pantry coordinator or a community referral agency.
- ❖ 50% of all food distributed by a TEFAP Distribution Site must be privately donated or purchased food when measured over the course of a year. The RFBs can offer support to Distribution Sites that have trouble in meeting this goal. The reason for the 50% goal is that TEFAP is intended to supplement the privately donated and purchased food already distributed by emergency food providers rather than serve as a primary source of food.
- ❖ Distribution Sites may have a geographically defined service area, such as a school district, county, zip code or neighborhood. Service areas help ensure that as many low-income families as possible in each county have access to emergency food without duplicating services.
- ❖ Food assistance must be provided to households such as new residents and homeless persons or migrants, who do not have proof of living within the service area at the first visit.
- ❖ Distribution Sites should have at least one freezer, one refrigerator, good quality shelving, and an adequate, well-maintained facility, storage area and equipment.
- ❖ Distribution Sites must comply with the Americans with Disabilities Act that requires removal of architectural or structural barriers. If the agency can make the accommodations without great difficulty or expense or make accommodations (for example taking food boxes to the individuals car, drive thru model, etc.) The accommodations must be noted in the Distribution Site application and or on the monitoring visit form.

Criteria for Eligibility and Application Process

The TEFAP application process is designed to require minimal paperwork. The HRP encourages Distribution Sites to keep the process simple for many reasons; a process that eliminates unnecessary documentation can help to maintain client confidentiality and ensure Civil Rights compliance requirements are met.

Eligibility

Arizona households are eligible to receive commodities at participating food pantries if the total gross income for the household does not exceed 185% of the federal poverty level provided on the current year TEFAP Income Guidelines form.

- ✓ A household can be a single person or a group of persons (related or not) who live as one economic group and customarily purchase and prepare food together. Assets are not included in the gross household income.
- ✓ Eligibility is based on current income status and self-declared eligibility for participation.
- ✓ Homeless people are eligible to participate and must meet state income eligibility requirements in order to receive TEFAP food that is not served in prepared meals.
- ✓ Homeless people can receive prepared meals served in a congregate setting without eligibility guidelines. Recipients of prepared meals are considered needy and are not subject to income requirements.
- ✓ Participants must live in Arizona and there is not a minimum length of stay required to prove living within the service area.

Application Process

- ✓ The application process requires the participant to complete the Household Distribution Sign-In Sheet with their name, household address and the number of people in their household.
- ✓ A utility bill or a piece of mail can be used to demonstrate that they live in the Distribution Site service area.
- ✓ Households must not be required to show proof of income. Participants self-declare eligibility upon signing the application.
- ✓ Households are not required to show proof of dependents.
- ✓ Households must not be asked or tracked by their Social Security number.
- ✓ Participants may be asked at subsequent visits if anything has changed about their situation; if not, pantries are only required to have the participants sign for receipt of the commodities.
- ✓ Participants must sign for the receipt of commodities each time they receive food.

Identification

- ✓ Pantry staff and volunteers should request ID from the household member or proxy who is providing the signature for the receipt of commodities.
- ✓ HRP does not require households to provide documentation for proof of their dependents.

- ✓ ID can be a Driver's license, a State ID card, another form of a picture ID, or any other form that proves identity.

Income Eligibility

HRP updates forms every spring with the new guidelines. These forms are available from the regional RFB and are available at the <https://www.azdes.gov/TEFAP/>. New forms must be in use by the beginning of the new state fiscal year, July 1st. Forms must be replaced even if forms currently in use have not been completed because participants do not get food every month.

Once proof of living within the service area is established, it is not necessary to re-verify this again at each subsequent visit. Many pantries have an annual intake process to update information. The pantry can ask whether any information has changed since the last visit.

Frequently Asked Questions

Can TEFAP pantries impose other eligibility criteria? Food pantries that distribute commodities agree to use only household income and proof of living within the service area as the basis for determining eligibility for all food they distribute. Civil Rights Laws prohibits discrimination in the delivery of services on the basis of race, color, age, national origin, sex or disability. The only time it is reasonable to decline food assistance to a person who is otherwise eligible is if they act in a belligerent or threatening fashion, appear to be intoxicated or using illegal drugs. Persons exhibiting irresponsible behavior may be invited to return when they can be cooperative.

TEFAP household Distribution Sites, proxies receiving a food package on behalf of a TEFAP client are required to show identification before receiving the TEFAP commodities. There is no federal regulation requiring that clients provide proof of identity, residency and income, and clients cannot be denied services for not providing these. If clients are not required to provide proof of identification, can sites require that proxies provide such information?

A1: In accordance with 251.5(b), States are required to establish uniform statewide criteria for determining the eligibility of households to receive TEFAP foods. These criteria must include the methods by which households may demonstrate eligibility. If the State agency does not require proof of identification for TEFAP participants, then a food pantry may not require this proof for participants or proxies.

Are migrant families eligible for TEFAP at food pantries? Yes, migrant families that meet TEFAP income limits are eligible. Because migrant earnings fluctuate widely throughout the year, migrant households may use either monthly or annual gross income to meet income limits. For this reason, the Spanish version of the Household Distribution Sign-In Sheet shows both monthly and annual income limits.

How do food pantries serve non-English speaking people who request food assistance? Generally, service must be provided – but there can be flexibility in how it is provided.

Volunteers may be used, but make sure they understand participant confidentiality. Contact the regional RFB if an interpreter is needed for a participant. Distribution Sites are required to develop methods for ensuring meaningful and accurate communication for Limited English Proficiency (LEP) groups in the Distribution Site service delivery area.

Different treatment based on a person's inability to speak, read, write or understand English may be a type of national origin discrimination.

How can food pantries serve homebound participants and determine eligibility?

Food pantries shall allow authorized persons (proxies) to pick up food for participants if they present a valid proxy note. Proxy letters are required for a client to pick up commodities for another client unable to pick-up for themselves. The letters will need to be accompanied by a copy of a picture identification and also a copy of a utility bill or any document that shows the person's name and address, for example a driver's license. The letters need to have as much information as possible not just "This is Gloria and Linda can pick up a box for me." The letter needs to include number of adults and children live in household as well. Letters will be valid for 6 months only and maintained on file at the agency, for reference purpose.

Example below:

March 20, 2014

My name is Gloria Garcia-Hernandez; I am requesting that Linda Hamman pick up a box for my family and me. There are 4 children and 2 adults in the household. Please contact me with any questions at 123-456-7890 if you have any questions.

Gloria Garcia-Hernandez

1789 W. Food Bank Way

Phoenix AZ 85042

For Distribution Sites that make home deliveries, the participant simply signs the Household Distribution Sign-In Sheet form.

Can Distribution Site staff and volunteers receive commodities? Pantry staff and volunteers may receive commodities if they meet TEFAP income and proof of living within the service area requirements. They must complete the TEFAP eligibility form just like any other participant. They cannot receive preferential treatment or larger food packages than others. Staff and volunteers at meal sites and shelters may receive meals prepared with commodities if it is the Distribution Site's practice to serve meals to workers and the site serves predominately low-income people.

What if a participant lives outside a pantry's service area? It is the policy of HRP that participants seeking food assistance at TEFAP Distribution Sites must be provided food

assistance at the first visit. At that time, they should be given information about pantries serving the area where they live for the second visit. If they return the following month, they may be declined service at the site's discretion. Participants from outside the service area may sometimes ask to receive commodities only because their regular pantry does not have them. TEFAP pantries should not do this because it encourages participants to disregard pantry service boundaries and commodities are intended to be integrated with private food packages.

What if it is suspected that a pantry participant is misrepresenting their income? Contact the regional RFB TEFAP manager. They have the experience and a solid foundation in Civil Rights compliance. The RFB manager can help the food pantry manager decide upon next steps and a plan of action if the situation warrants attention. The situation may or may not require intervention and a personal interview with the participant. Any concerns about abuse must not be discussed among volunteers – this can lead to a breach of confidentiality.

Are private interviews required? Interviews offer an ideal time to learn more about a participant's circumstances and needs and give referral information. Some pantries have sufficient space to interview participants in private rooms, while others do not. In either case, all pantries must have sufficient space between waiting areas and interview areas so participants can provide personal information to workers without being overheard by others. Participant information is confidential and staff and volunteers must take care to protect participant's identity to the extent allowable in a food pantry setting.

Are there guidelines for preparing Emergency Food Boxes? Yes. Emergency Food Boxes should be as nutritionally balanced as possible and should ideally contain a 3-5 day supply that is adjusted for the size of the household. The recommended distribution is as follows: one "box" per household. Additional "large family/supplemental bags" can be distributed to households of 5 or more based on the breakdown below:

Household Size: 2-4 = One Box

Household Size: 4-6 = One Box and supplemental bag

Household Size: 6-8 = One Box and 2 supplemental bag

8-up = Two Boxes and Two supplemental bags (2 signatures will be required on the household distribution sign-in sheet)

The actual amount and type of food in each package will of course depend on exactly what and how much food is in storage. Do consider appropriate foods for individuals with reduced ability to prepare foods (i.e., persons with disability), inadequate cooking facilities and for homeless individuals.

What is a "nutritionally balanced" food package? A nutritionally balanced food package contains a meat or protein, fruit and/or fruit juice, vegetables, and grain (bread, rice, cereal or pasta). The USDA's food guide pyramid is available on the Internet at

<http://www.usda.gov/cnpp/pyramid.html> and includes an explanation of the basic food groups and how much of each group constitute a healthy diet.

Can pantries decide whether to give fixed food packages or let participants choose the food? It is up to the pantry to decide what works best for them. Many pantries have become “Participant Choice” - allowing families to choose the food they want within limits set for each household size. “Participant Choice” pantries usually find that there is less waste because participants take only the food they can use. Food pantry staff will encourage households to say “no thanks” to food items they do not want.

When our pantry prepares food packages, do we mix commodities with private food or bag them separately? It may be done either way. However, unless there are many participants being served whose income exceeds TEFAP income limits (see below), there is no reason to stock or bag commodities separately from private food. There is also no requirement that individuals receive a certain percentage of commodities or private food in a particular food package. The important thing to consider is to provide packages that are nutritionally balanced and contain a variety of foods.

How often can participants be served? TEFAP pantries must serve income eligible participants at least once a month. However, pantries may serve participants more often than that if they choose. Regardless of how often in a month participants are served, all food packages may contain TEFAP commodities. This does not concern meal sites and shelters that usually serve all participants multiple times in a month.

If a household has an exceptional need for food, can we give them more than our standard package? Yes, the household may be given a larger quantity of food than the standard package or they can be invited to return later in the month. Food pantries that provide extra food in the same month to families in crisis should have some criteria for deciding if a household’s financial situation warrants extra food. All households should be made aware of the policy and pantries should be careful to apply it in a fair and a non-discriminating manner.

What if a household needs food assistance but their income is too high for TEFAP? The food pantry may serve households whose income is higher than 185% of the poverty level, but should not include TEFAP commodity items in the food package. Although there are many reasons why a higher income family may require food assistance, federal law requires states to set a gross income limit for receipt of commodities.

Are Distribution Sites required to publicize their services? All Distribution Sites must post an exterior sign noting the days and hours of operation, the main phone number, and where to call after hours in an emergency in English, in languages of the LEP groups in the Distribution Site’s service area, and in alternative formats for the visually impaired. A signage interpreter should give the hearing impaired. Distribution Sites should also make reasonable efforts to inform low-income people in the community of their services, hours and eligibility criteria. Examples of outreach include articles in organizational newsletters and newspapers, public service announcements in the media, contacting community agencies that make referrals such as social services, school counselors, churches, police, and other low-income serving organizations, placing posters in stores, Laundromats, and libraries, etc. Outreach to potential

participants is especially important when a Distribution Site has a large service area or serves people in more than one community.

Why is participant referral so important? Households seeking food assistance are frequently eligible for other assistance programs that may provide much needed resources and reduce the need for emergency food. This includes nutrition programs (SNAP/food stamps, WIC, school meals, elderly meal sites, meals-on-wheels,), as well as non-nutrition programs like health care, energy assistance, cash assistance and child care, child support, disability assistance, and tax credits. Participation in non-nutrition programs can improve household food security by reducing other expenses and leaving more money in the household budget to purchase food at grocery stores.

Distribution Sites should provide participants with written resource materials or distribute them in with food packages on a regular basis. When pantry workers encourage participants to apply for programs, it helps them to overcome stigma and reluctance.

Where can I get eligibility information on federal assistance programs? HEAplus is the HRP website where people can find out in less than 15 minutes if they may be eligible for important federal health and nutrition programs. Visitors to the site simply type in basic information about the people in their household, their income and expenses, and HEAPLUS determines if they might qualify for Nutrition Assistance (food stamps), WIC, medical assistance, AHCCCS), and other programs. People can also use HEAPLUS to apply for benefits, check their benefits and report changes. If the pantry, meal site or shelter has Internet access, assist participants to use the site or provide a computer terminal where they can use HEAPLUS themselves. The addresses are www.healtharizonaplus.gov or <http://arizonaselfhelp.org>.

How often do Distribution Sites receive commodities? Food is delivered at a minimum once a month.

How does the RFB determine the amount of food a Distribution Site receives? Each county is offered a percentage of the commodities available to the entire state based on both the number of low-income and unemployed people who live there. Regional Food Banks will usually give food to Distribution Sites based on the number of people served monthly or similar criteria. The RFB also may adjust the amount of food for a Distribution Site based on the Distribution Site's inventory, local demand, availability of private food, and storage capacity.

How do Distribution Sites physically receive delivery of commodities? The USDA delivers TEFAP food directly to four Regional Food Banks, St. Mary's Bank Alliance, United Food Bank, Yuma Community Food Bank and Community Food Bank of Southern Arizona—which are under contract with HRP. From there they distribute the food at least monthly to individual Distribution Sites. In counties with only one TEFAP Distribution Site, commodities are usually delivered directly to the Distribution Site. In counties with multiple TEFAP Distribution Sites, commodities are usually delivered to a central drop off location – such as a food bank, warehouse or large pantry. Either from there the regional RFB will deliver it to individual Distribution Sites or Distribution Sites will pick it up. It is the responsibility of staff and volunteers at the receiving site to unload and store the food.

What if food is damaged, “out-of-condition” or the quantity is wrong at the time of receipt. USDA commodities are very high quality and rarely in poor condition. However, when Distribution Sites take receipt of commodities they should always verify the kind, quantity and condition of the food. “Out-of-condition” products are those that come from the processor contaminated, deteriorated, spoiled, infested or with packaging defects. Cans that are leaking, bulging, have sharp dents, or have rust on the seams are also considered out-of-condition. Any discrepancies (shortage, overage, damage or out-of-condition) must be noted on the Bill of Lading form and signed by both the driver and Distribution Site representative. Damaged or out-of-condition food must be accepted from the trucker but should be reported immediately to the regional RFB.

What are the basic storage requirements for TEFAP food? All TEFAP Distribution Sites must...

- ✓ Maintain food within optimal storage conditions, including monitoring and logging temperatures of freezers, refrigerators and dry storage.
- ✓ Store food on racks or pallets that keep it at least 6 inches off the floor, 4 inches from the wall and 2 feet from the ceiling.
- ✓ Keep rooms and shelving clean, well maintained, and free of toxic items (like cleaning supplies, paint or hazardous chemicals) that could contaminate food.
- ✓ Keep storage areas free of pests such as rodents and insects. Distribution Sites must either contract with a professional pest control company or regularly inspect storage areas themselves, taking all necessary steps to prevent and safely control any infestations that might occur.
- ✓ Insulate any heat generating pipes or ducts.
- ✓ Ensure the food storage area is secure to prevent access by unauthorized persons.

When should temperatures be reviewed and recorded? Check temperatures and record in the log at the beginning of the day when the Distribution Site is first opened and food distribution begins. Many Distribution Sites may be closed for days or even weeks in between open hours of operation. If the Distribution Site is open every day, it is still necessary to check temperatures daily. Refrigerator and freezers must be checked for appropriate temperatures.

What temperatures are required to safely store food? “Frozen” food must be stored at or below zero degrees Fahrenheit. “Refrigerated” food must be maintained between 35 and 41 degrees Fahrenheit. Food requiring “dry” storage must be kept between 40 and 70 degrees Fahrenheit. Maintaining food within these temperatures prevents spoilage and the growth of bacteria and helps food retain its optimal flavor, quality, color and texture. At higher temperatures, some products can deteriorate or spoil. For instance, the yeast in Bakery Mix packages can activate above 70 degrees Fahrenheit, causing packages to swell or break.

What if the storage area gets warmer than 70 degrees in the summer? The site may need to increase ventilation, install air conditioning or add fans. If the refrigerators and/or freezers are in the same room as dry storage, they may be contributing to the problem due to the large amount of heat they give off. If possible, keep refrigerators and freezers in a different room than dry storage, and make sure heat generating pipes and ducts are fully insulated.

What is FIFO? Inventory should be managed so that food received first is the first to be distributed. This is referred to in warehouse management as FIFO – First In, First Out. The best way to ensure this happens is to mark cases when they arrive with the month & year of receipt. It also helps to rotate the oldest stock to the front where it will be used first and place recently received food above, below or to the back.

How long can commodities be kept in storage? Commodities should be distributed promptly. A 2 to 3 month supply based upon the numbers of people served is an appropriate inventory. Distribution Site coordinators should manage their inventory carefully so that commodities are distributed promptly. Clearly marking cases with the month and year of receipt will help ensure food is distributed in a timely manner. If the inventory is becoming too large, ask the regional RFB to reduce the volume of monthly deliveries.

What if products pass their expiration date? Cases of USDA commodities may contain an expiration date. If a product passes its expiration date, contact the regional RFB for guidance. All Distribution Sites should also carefully inspect non-USDA donated food products to make sure they are not outdated. The primary concern with expired or outdated food products is not necessarily with food safety, but rather concern that food may lose optimal flavor, color, texture or nutrition.

The Power is Off? Is the Food Still Safe? If the power goes out due to a winter storm or an unexpected summertime power outage, it may be difficult to determine whether the food in the refrigerator or freezer is safe to consume. It is important to inspect any food for unusual odor or appearance. Refrigerated Foods are safe as long as the power is out for no more than a few hours. Keep the door closed; food will remain chilled for 4 to 6 hours if the door is

Not opened. When power is restored, check all food according to the following guidelines.

What foods will not be safe to consume? Some refrigerated food may be unsafe to consume if stored above 40°F for more than 2 hours. These foods should be discarded:

- ✓ Raw or cooked meat, poultry, seafood
- ✓ Meat-topped pizza, lunchmeat
- ✓ Casseroles, stews or soups
- ✓ Milk/cream, yogurt, soft cheese (such as feta and Brie)
- ✓ Mayonnaise, tartar sauce, or creamy dressings, gravy
- ✓ Cooked pasta, potato, rice and salads prepared from these foods
- ✓ Fresh eggs, egg substitutes
- ✓ Cookie dough, cream-filled pastries, custard, chiffon or cheese pies

What foods can be kept? The following foods can be safely stored at room temperature (above 40°F) for a few days. These foods will be safe to consume, even if the power is out for 1 to 2 days.

- ✓ Butter and margarine
- ✓ Hard cheeses (such as Cheddar, Swiss)
- ✓ Fresh fruits and vegetables

- ✓ Fruit juices*
- ✓ Dried fruits and nuts
- ✓ Fresh herbs and spices
- ✓ Opened jars of salad dressing, peanut butter, jelly, relish, barbecue sauce*
- ✓ Mustard, ketchup, and olives*
- ✓ Fruit pies*
- ✓ Bread, rolls, cakes and muffins

*Note: These foods may spoil due to yeast and mold growth if left at room temperature.

Can I re-freeze thawed food if a freezer malfunctions? It depends on the type of food, and how long it has thawed. If in doubt, always err on the side of safety when it comes to public consumption. If the power is out for longer than 4 hours, follow the guidelines below:

Freezer section: A freezer that is half-full will keep food safe for up to 24 hours. A full freezer will hold food safely for 48 hours. Do not open the freezer door if it can be avoided.

Refrigerated section: Pack milk, other dairy products, meat, fish, eggs, gravy and spoilable leftovers into a cooler surrounded by ice. Styrofoam coolers are fine for this purpose.

What if stored food becomes damaged, spoiled or stolen while in our possession? It is important not to distribute food that is in cans that are severely dented, has torn packaging, is damaged by water or insects, is out-of-condition, or has thawed and cannot safely be refrozen. Report any commodity loss due to damage, infestation, spoilage or theft immediately to your Regional Food Bank /TEFAP contact.

Do not dispose of commodities until the RFB gives approval unless there is an immediate concern for safety. In some cases, USDA will investigate commodity loss and the commodities are required for evidence. The RFB may be responsible for the commodity replacement value if the value of the loss is more than \$100 and is due to negligence. The food pantry must take and record the temperatures in all storage areas, ensure building security, make routine inspections for spoilage, and have pest control.

Where can I find more information on TEFAP and each commodity? These links at the federal government agency website provide program facts, a list of commodities and fact sheets and recipes. <http://www.fns.usda.gov/tefap/emergency-food-assistance-program-tefap>

Where can I find additional information on food safety? Call the USDA Meat and Poultry Hotline at 1-888-674-6854 or visit “Ask Karen” at <http://www.fsis.usda.gov/wps/portal/fsis/home> and click on “I Want to...Ask a food Safety Question.”

What records must TEFAP Distribution Sites maintain? Federal and state rules require Distribution Sites to keep certain basic records to document participant eligibility and the receipt, storage and inventory of food. The following records must be kept for 3 years at either the Distribution Site or the regional RFB.

- ❖ Signed forms (TEFAP Household Distribution Sign In Sheet) documenting eligibility and receipt of commodities from pantries.

- ❖ Service Statistics. Pantries must maintain a count of the number of adults, children and households they serve each month. Meal sites and shelters must record the number of meals served monthly. The regional RFB collects these figures each month.
- ❖ Non-USDA food. Pantries must track the pounds of non-USDA food they collect each month. They may report an exact weight if they weigh the food they collect and distribute or they may provide an estimate using a reasonable method. For example, weigh 10 food bags or boxes packed with private food to get an average weight per package. Then multiply the number of bags or boxes of private food by the weight per container given to each customer. The regional RFB collects these figures each month.
- ❖ Temperature, cleaning, inspection logs. Distribution Sites must record the temperature at the start of Distribution Site operations. Distribution Sites also must record the dates they clean the premises and make visual inspections for spoiled food and pests. Some Distribution Sites keep temperature, cleaning and inspection logs on a single sheet. Others post temperature logs on each unit inspected for ease of recording. Regional RFBs inspect these logs whenever they conduct site reviews of Distribution Sites.
- ❖ Distribution Site reviews. Distribution Sites should keep a copy of any on-site reviews conducted by the regional RFB, including recommendations.
- ❖ Where can I get TEFAP forms? Check with the regional RFB or they are available at the <https://www.azdes.gov/TEFAP/> . For a listing of forms, please refer to the TEFAP Policy and Procedures Manual at <https://www.azdes.gov/main.aspx?menu=359&id=14706>

Can Distribution Sites give participants political or religious materials during food distributions? No. TEFAP Distribution Sites may not engage in political or religious activities when distributing food. Political candidates may not make appearances at these times and campaign signs and materials may not be evident. Bags or boxes advertising candidates or political causes may not be used for food packages containing commodities. Distribution Sites may not require or pressure participants to attend political or religious meetings or to join an organization as a condition of receiving assistance.

Can TEFAP Distribution Sites ask participants for donations? Distribution Sites that receive federal commodities may not ask participants to donate money, materials or services in exchange for food. Distribution Sites may not post signs requesting “voluntary” donations nor place donation containers in the area where participants are served.

Can TEFAP Distribution Sites choose to serve some people but not others? Federal and state laws prohibit discrimination on the basis of race, color, national origin, sex, age, religion, political beliefs or affiliation, disability, or association with a person with a disability or if the person is a Limited English Proficient applicant. State law prohibits discrimination on the basis of employment status. All Distribution Sites must display the poster “And Justice for All” where it can be seen by all participants. Please contact the regional RFB for additional copies. As already noted, it is reasonable to decline services to an otherwise eligible participant if they behave in a belligerent or threatening fashion or appear to be intoxicated or using illegal drugs. Pantries also may decline to serve participants who live outside their service area.

Can Distribution Sites or participants sell commodities? Commodities are intended solely for private consumption by eligible recipients. The sale, trade, exchange or other disposal of

commodities or use of commodities for personal gain is strictly prohibited and subject to federal and/or state prosecution.

Can Distribution Sites repackage commodities? TEFAP commodities must be distributed only in their original packaging to ensure food safety. Repackaging in any form is strictly prohibited.

Can Distribution Sites give or trade commodities among themselves? A TEFAP Distribution Site may only transfer commodities to another TEFAP Distribution Site with the approval of the regional RFB. A TEFAP Distribution Site may never transfer or trade commodities with another Distribution Site that has not been approved to distribute TEFAP.

Are TEFAP Distribution Sites required to comply with Federal and State Civil Rights Compliance Requirements? All regional food banks and TEFAP Distribution Sites receiving federal or state financial assistance/commodities must comply with the most recently published FNS Civil Rights Policy. All who work with Federal Nutrition Service funded programs must be trained in Civil Rights required training topics. Distribution Sites that receive TEFAP commodities are included as federally funded programs. First line workers (including volunteers and supervisors must receive annual training. There is flexibility in how the training is provided. Please notify the RFB TEFAP contact person if a worker has not been trained. The Goals of Civil Rights are equal treatment for all applicants and beneficiaries under the law, Knowledge of rights and responsibilities, elimination of illegal barriers that prevent or deter people from receiving benefits, dignity and respect for all.

Civil Rights Required Training Topics include....Knowledge of protected classes, the types of discrimination complaints that can be filed, complaint procedures and conflict resolution, customer service, language assistance/accommodations and effective public notification systems.

When do Civil Rights rules apply? – Civil Rights rules apply any time there is any state or federal financial assistance. Federal financial assistance is receiving anything of value from the federal government – not just cash. This can include commodities, training, equipment, and other goods and services.

Special circumstances

- ❖ Make sure people with disabilities are accommodated. Distribution Sites should be accessible to people with all types of disabilities (e.g. mobility, sight, hearing, other) OR alternate means of service delivery should be advertised and provided, such as using a proxy to pick up food or making home deliveries.
- ❖ Provide other language assistance to persons with LEP who could not gain meaningful access to the program without other language assistance. Assistance must always be provided to LEP households, but the level or type of assistance can vary based on circumstances.

Other requirements

- ❖ Treat all people with dignity and respect.

- ❖ Display the USDA “And Justice for All” non-discrimination poster in a place where it can be seen by all who visit the premises.
- ❖ Include the USDA non-discrimination statement on all materials and websites that mention USDA funded programs. There is both a “long” and “short” version.
- ❖ Use the Non Discrimination Long Statement in documents advising people of their rights: The U.S. Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual’s income is derived from any public assistant program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)
- ❖ If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.
- ❖ Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).
- ❖ USDA is an equal opportunity provider and employer.
- ❖ Use the Non Discrimination Short Statement in outreach materials or websites: “This institution is an Equal Opportunity Provider.”
- ❖ Conduct outreach to ensure that potentially eligible persons and households are aware of the program and have information on how to apply.
- ❖ Maintain confidentiality. It is not appropriate to talk about who is receiving benefits and to make remarks about them. Speak quietly with participants. Do not shout out names. Never share information with others regardless of an expression of good intentions. Refer all requests for information to managers.
- ❖ Failure to follow Civil Rights rules can lead to loss of Federal financial assistance.
- ❖ Sexual harassment is prohibited. Do not engage in or tolerate unwanted or unwelcome sexual behavior including jokes, touching, requests for sexual favors, etc. Report violations to management or to state or federal officials.
- ❖ .Advise people who allege discrimination about how to file a complaint
 - For discrimination complaints concerning Arizona’s protected classes, they should first contact the regional TEFAP Coordinator. If the issue cannot be resolved, they should contact the TEFAP Coordinator, Arizona Department of Economic Security, Division of Benefits and Medical Benefits, 1789 West Jefferson Phoenix, AZ 85007 or call (602) 602-771-2788.

Participant Confidentiality

HRP requires that participant confidentiality is acknowledged and maintained at all times. Participants seeking food assistance are providing household information at the time they complete eligibility certifications. This information is confidential and every step should be taken to ensure that the information is protected. Only immediate staff and volunteers should have access to this information. Distribution Sites must ensure that there are procedures in place to respect participant confidentiality when seeking food assistance. Participant names should not be yelled out during the food distribution process, nor should participants names be visible to others during the signing in process.

These actions must be taken to ensure that participant confidentiality is maintained.

1. Participants' files must be maintained in locked files and /or in rooms that can be locked and are secure from unauthorized entry.
2. When files are used during pantry visits, they must be handled in ways to maintain participant confidentiality; e.g., so that participants cannot read another person's file, nor may the files be left unlocked or unattended.
3. Files must not be taken home or to other places except as required for travel to commodity Distribution Sites. During such travel, files should be transported in such a way to maintain confidentiality and must be in the possession of pantry staff at all times.

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