



STATE OF OHIO
OHIO DEPARTMENT OF JOB & FAMILY SERVICES

STATE PLAN FOR THE OPERATION AND
ADMINISTRATION
OF THE COMMODITY SUPPLEMENTAL FOOD
PROGRAM (CSFP)

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ADMINISTRATIVE SUMMARY

This State Plan of Operation sets forth the procedures to be utilized in the administration of the Commodity Supplemental Food Program (CSFP).

The Ohio Department of Job & Family Services (ODJFS) is the State Distributing Agency (SDA) responsible for the administration and oversight of CSFP in Ohio. ODJFS administers CSFP in accordance with the provisions of 7 CFR 247 and 7 CFR 250, as applicable. CSFP is in the Food Programs section of the Office of Family Assistance under the Ohio Department of Job and Family Services.

All Local Agencies participating in CSFP are required to have and maintain a copy of the Ohio Food Programs Manual on site.

LOCAL AGENCY IDENTIFICATION

ODJFS initiates grant agreements with thirteen regional foodbanks for local level administration of CSFP. A foodbank within each region is designated as a Local Agency, who is responsible for the receipt, storage, transportation and distribution of CSFP food packages within their service territory. The names and addresses of all thirteen regional foodbanks with which ODJFS has entered into an agreement are the following:

Name	Address	County Service Area
Akron-Canton Regional Foodbank	350 Opportunity Parkway Akron, Ohio 44307	Carroll, Holmes, Medina, Portage, Stark, Summit, Tuscarawas, Wayne
County Neighbor Program	39 South Maple Street Orwell, Ohio 44076	Ashtabula
Freestore Foodbank	3401 Rosenthal Way Cincinnati, Ohio 45204	Adams, Brown, Clermont, Clinton, Hamilton, Highland, Pike, Scioto
Greater Cleveland Foodbank	13815 Coit Road Cleveland, Ohio 44110	Ashland, Cuyahoga, Geauga, Lake, Richland
Mahoning Valley Foodbank	2805 Salt Springs Road Youngstown, Ohio 44509	Columbiana, Mahoning, Trumbull
Mid-Ohio Food Collective	3960 Brookham Drive Grove City, Ohio 43123	Belmont, Coshocton, Delaware, Fairfield, Fayette, Franklin, Guernsey, Harrison, Jefferson, Knox, Licking, Madison, Marion, Monroe, Morrow, Muskingum, Noble, Pickaway, Ross, Union
Second Harvest Foodbank of Clark, Champaign & Logan Counties	701 East Columbia Street Springfield, Ohio 45503	Clark, Champaign, Logan
Second Harvest Foodbank of North Central Ohio	5510 Baumhart Road Lorain, Ohio 44053	Crawford, Erie, Huron, Lorain
Second Harvest Foodbank of Southeastern Ohio	1005 CIC Drive Logan, Ohio 43138	Athens, Gallia, Hocking, Jackson, Lawrence, Meigs, Morgan, Perry, Washington, Vinton
The Foodbank	56 Armor Place Dayton, Ohio 45417	Greene, Montgomery
Shared Harvest Foodbank	5901 Dixie Highway Fairfield, Ohio 45014	Butler, Darke, Miami, Preble, Warren
Toledo Seagate Foodbank	526 High St. Toledo, Ohio 43609	Defiance, Fulton, Henry, Lucas, Ottawa, Sandusky, Williams, Wood
West Ohio Foodbank	1380 East Kibby Street Lima, Ohio 45804	Allen, Auglaize, Hardin, Hancock, Mercer, Paulding, Putnam, Seneca, Shelby, Van Wert, Wyandot

CERTIFICATION

Eligibility for participation in CSFP is based upon an applicant meeting the requirements for age, household income and residency. In accordance with 7 CFR Part 247, the state agency has developed a list of criteria for certification to be used by the Local Agency and its Local Distributors.

Income Eligibility Criteria

Program eligibility for applicants is established at 150% of the federal poverty level. Applicants self-declare their income eligibility when signing the CSFP application. Proof of income is not required.

All certification data is recorded on a certification form or an ODJFS approved electronic equivalent. Certification information includes: the applicant's name, address and phone number; income; household size; race and ethnicity; the name and address of the proxy authorized to receive the CSFP food package on the participant's behalf; date the initial application is received; the date of certification; the applicant's certification that he or she is eligible for the program; and the signature and title of the person making the eligibility determination. Local Agencies or Local Distributors will notify applicants determined to be eligible or ineligible for CSFP or being placed on a waiting list within ten days from the date of application. If eligible, the client will receive a notice with the location and scheduled dates for distributions. The notice will include the name, contact person, and phone number of the Local Agency or Local Distributor responsible for the distribution.

Household Size

Household is defined as a single individual or a group of related or non-related individuals, who are living as one economic unit, exclusive of boarders, who are not residents of an institution and for whom food is customarily purchased and prepared in common. No proof of household composition is required.

Age Verification

An individual must be at least 60 years of age to participate in CSFP. Verification of age may be obtained through any of the following sources but not limited to:

- Birth certificate;
- Driver's license;
- State issued identification;
- Social Security Administration records;
- Passport or passport card;
- Birth certificate; or
- Any other reasonable, non-questionable document establishing the participant's age.

Identity Verification

An individual must present valid identification at application and recertification. Verification of identity may be obtained through any of the following sources:

- Birth certificate;
- Driver's license;
- Passport or passport card;
- Identification card issued by another assistance or social service program (e.g., Medicaid enrollment card);
- Veterans' Health Identification card;
- Work identification card; or
- Any other reasonable, non-questionable document establishing the participant's identification.

Residency Verification

Eligibility requires a determination of the residence of the applicant within the Local Agency's service area.

Verification of residency may be obtained through any of the following sources:

- Recent utility bill;
- Driver's license;
- State issued identification; or
- Any other reasonable, non-questionable document establishing the participant's

residency.

Migrant and seasonal farm workers entering a CSFP service area will be considered as meeting the residency requirement. Homeless individuals may use the address of a local shelter or pantry.

Homebound Participants

Eligible participants who are unable to attend distributions may designate a relative, friend or caregiver as their proxy for receipt of the food package. The proxy must provide some form of identification prior to receiving the client's food package. A proxy is not required to provide a signature to verify receipt of the food package. Staff or volunteers are required to verify the identity of who picks up the CSFP food package and ensure all food packages are properly accounted for. An example of accounting for CSFP package distribution could be a printout list of participants (or some other format) to document that it was received.

Proxy Information

When a participant has authorized a proxy to obtain CSFP food package on their behalf, Local Agencies or Local Distributors are required, at minimum, to do the following:

- Obtain proxy designations in writing, including the period of time the designations are intended to cover; and
- Maintain records of all written proxy designations.

Private, For-Profit Companies CSFP Food Package Deliveries

In accordance with Policy Memo FD-150, ODJFS will allow commercial entities to provide home delivery services of food packages to CSFP participants. An agreement or contract must be in place between the company and the Local Agency which ensures that the delivery service adheres to all CSFP program regulations.

Certification Periods

Participants are eligible for CSFP for one year. A recertification review will occur with participants by the end of the last month of the certification period.

Waiting List Procedures

Each distribution site will have a maximum caseload based on the number of slots funded for the program year. When a maximum caseload is reached, the Local Agency or Local Distributor will establish a waiting list. In establishing the waiting list, certification caseworkers will include the date of application and information necessary to allow the Local Agency or Local Distributor to contact the applicant when caseload space becomes available. Unless the applicant has been determined ineligible, the person will be notified of their placement on a waiting list within 10 days of applying. For an individual, who has remained on the waiting list for greater than six months, the Local Agency or Local Distributor will perform a full certification prior to providing that individual with a CSFP food package. When certifying a participant and providing a CSFP food package for only one month, the Local Agency or Local Distributor will provide the participant notification of placement back on the waiting list.

Detection of Dual Participation

The CSFP application informs applicants that it is a program violation to participate at multiple CSFP sites. Simultaneous participation in CSFP at more than one distribution site will result in immediate elimination from the CSFP site where the participant does not reside. If dual participation occurs due to a client's fraudulent information or action, the Local Agency will initiate a claim action against the client to recover the value of the food package improperly received. Applicants are required to certify on the application that they understand the consequences of dual participation. This information is read to the participant or to the participant's representative if they are unable to read the information on their own.

Cost-Effective Claim Standards

ODJFS has established the following cost-effective claim standard: The pursuit of a claim against a participant to recover the value of the CSFP food package improperly received or used is cost effective when the value exceeds \$100 or 5 months of receiving a CSFP food package. Local Agencies are required to use this standard in determining if a claim is to be pursued and to pursue claims in accordance with 7 CFR 247.30 and ODJFS policy.

Notification of Fair Hearing

Applicants will be informed on the application that they have a right to a fair hearing and that they may appeal any decision made by the Local Agency regarding denial or termination from the program. This information is read to the applicant or to the applicant's representative if they are unable to read the information on their own.

Additionally, applicants are informed of the following:

- The standards for participation in the program are the same for everyone regardless of race, color, national origin, sex, (including gender identity and sexual orientation), age or disability;
- Nutrition education is available to them;
- Report changes in household income or household composition within 10 days after the change becomes known to the household; and
- Improper use or receipt of a CSFP food package as a result of dual participation or other program violations may lead to a claim against the individual to recover the value of the food package, and may lead to disqualification from CSFP.

Nutritional Risk Eligibility Criteria

Evaluation of nutritional risk is not an eligibility criteria option utilized in Ohio.

CASELOAD MANAGEMENT

Caseload Assignment

Initial caseload assignment is designated by United States Department of Agriculture (USDA), Food and Nutrition Services (FNS) based on a formula established in 7 CFR 247. FNS assigns caseload to States on December 31st of each year or within 30 days after enactment of appropriations legislation covering the full fiscal year, whichever comes later.

Based on the need within a Local Agency's service area and their demonstrated ability to administer the program, ODJFS assigns CSFP caseload to a Local Agency, who in turn, determines the allocation of caseload throughout their service region. A Local Agency will determine the method of distribution to program participants, either through an agreement

with a Local Distributor or by direct service by the Local Agency. Local Agencies must maintain a current master list of all CSFP participants and their designated proxy(ies) assigned at each distribution site.

Caseload Expansion Requests

Requests for additional caseload are completed in accordance with federal regulations. Requests for additional caseload slots identify the number of new slots being requested and the geographic area to be served.

Achieving Maximum Caseload

The ODJFS caseload distribution is monitored on a monthly basis. Local Agencies or Local Distributors, actively seek to follow-up with recipients who fail to pick up their CSFP food package each month. Local Agencies are required to annually serve at least 95% of their assigned caseload and will utilize whatever outreach measures are necessary to achieve maximum distribution. When a food package cannot be distributed to active, eligible recipients, the Local Agency or Local Distributor utilizes their waitlists.

Reassignment of Underserved CSFP Caseload

If a Local Agency under serving caseload for a sustained period of time (3 months or more), the following steps may take place to ensure maximum statewide caseload is achieved.

- ODJFS staff will establish individual calls with the Local Agency to discuss strategies and timelines to achieve maximum caseload.
- ODJFS staff will find a Local Agency with waiting lists or immediate capacity to serve additional caseload, and transfer the unused caseload to that site(s). This transfer of caseload may not impact program funding during the current state fiscal year.
- At the end of the state fiscal year, ODJFS staff will reevaluate caseload assignments and potentially make permanent caseload assignments for the new fiscal year, or return caseload as determined by the final number of caseload served. As a result, grant awards may be adjusted accordingly.

NUTRITION EDUCATION

The goal of the nutrition education program is to enable CSFP participants to obtain better

nutritional status through increased understanding of basic nutrition principles and through effective use of food products. The following are essential to achieving that goal:

- The nutritional value of CSFP foods, and their relationship to the overall dietary needs of the population groups served;
- Nutritious ways to use CSFP foods;
- Special nutritional needs of participants and how these needs may be met;
- The importance of health care, and the role nutrition plays in maintaining good health; and
- The importance of the use of the foods by the participant to whom they are distributed, and not by another person.

Action Plan

Each Local Agency, who serves CSFP participants is responsible for providing nutrition education that can be easily understood by participants. Many materials are available for free or at a low cost from USDA and other sources. At a minimum, Local Agencies or Local Distributors must distribute either monthly or semi-monthly nutrition education information with monthly food packages, which may be in the form of a flyer, newsletter or handout. Fact sheets containing this information are available at: [Household Programs USDA Foods Product information Sheets and Recipes.](#)

The Local Agency or another agency with which it has signed an agreement may use CSFP foods to conduct cooking demonstrations as part of the nutrition education provided to program participants, but not for other purposes.

One of the key components of providing Nutrition Education is the use of existing facilities and services. The Supplemental Nutrition Assistance Education Program (SNAP-Ed) is a free Nutrition Education Program serving low-income individuals eligible to receive food assistance benefits or other means-tested federal assistance programs throughout Ohio. SNAP-Ed is funded by USDA's Food and Nutrition Service and serves in partnership with the Ohio Department of Job and Family Services and Ohio State University Extension. The goal of the program is to improve the likelihood that families and individuals will make healthy

food choices within a limited budget and choose active lifestyles. Nutrition education services are delivered by SNAP-Ed staff in participating counties throughout the state to eligible participants in multiple venues, such as schools, faith-based locations, community centers, elderly service sites, emergency food assistance sites, etc. SNAP-ED staff may provide services, such as nutrition educational classes, compiling the nutrition education informational material, onsite basic food preparation, group educational sessions, etc.

Local county health departments may also be able to assist with providing information on food safety policies pertaining to food distributors and preparers. Regularly scheduled training is beneficial to keep the network current on policies and procedures in all areas of food handling and distribution.

Evaluation of Nutrition Education

Local Agencies are required to implement an evaluation procedure to determine the effectiveness of the nutrition education. The process must allow for participant input and may be conducted by the agency or by a contracted nutritionist or other qualified professional. Evaluations should be done annually and may be a random sample of the clientele.

Client Outreach

Outreach activities are conducted at the Local Distributor level. Local Distributors will work in partnership with senior-serving organizations to inform the public about the CSFP program.

STORAGE and DISTRIBUTION of CSFP FOODS

USDA provides for the transportation of CSFP foods directly to the Local Agency's warehouse. Local Distributors, under agreement with the Local Agency, will assure that adequate care and security is provided for all USDA food packages while in their possession. USDA food packages will be stored in adequate and secured areas at each distribution site to safeguard them from spoilage, infestation, fire and other losses. CSFP food packages are to be distributed monthly, or bi-monthly with a 2 month supply of USDA food to participants. CSFP food packages cannot be distributed retroactively without permission from FNS.

Local Agencies must maintain a master list of all CSFP participants, and their designated proxy(ies) if applicable, assigned at each distribution site. Prior to distributing a CSFP food package, each participant or proxy is required to provide some form of identification. Local Agencies or Local Distributors must verify the identity of the participant or proxy when receiving the CSFP food package and ensure all food packages are properly accounted for. An example of accounting for CSFP package distribution could be a printout list of participants (or some other format) to document that it was received.

Local Agencies or Local Distributors may discontinue an individual from participation when two consecutive distributions have been missed with no communication. The participant shall receive a written notification of discontinuance of CSFP within 15 days prior to the effective date of termination. The notification of discontinuance shall include the effective date of discontinuance, the reason for the participant's discontinuance, a statement of the individual's right to appeal the discontinuance through the fair hearing process, and a statement that informs the applicant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability.

Inventory Control

Local Agencies are responsible for maintaining a system that will account for all CSFP foods received. CSFP foods must be stored in a manner that permits them to be distinguished from other foods and that a separate inventory record is maintained.

Each Local Agency will be responsible for ordering CSFP foods through the Web Based Supply Chain Management (WBSCM) system. Food boxes will be distributed to participants in a timely manner so items can be used before the “Best-If-Used By” date (BIUB). To assure the quality and freshness of USDA food products, the inventory practice of “First-In, First-Out” (FIFO) or when applicable, use “First-Expiring, First-Out” (FEFO) must be followed.

Each Local Agency will conduct a per unit month-end physical inventory of all CSFP foods including the content of undistributed food packages located in the warehouse and at distribution sites.

Local Agencies must enter and submit their FNS-153 Inventory data on a monthly basis by the 2nd Friday of the month following the month to which the report pertains through the

online CSFP Reporting Tool. The month-end data must accurately reflect their beginning and ending inventory balances, new receipts, food losses, any products that were transferred in or out, total number of participants served, and any positive or negative adjustments.

Local Agencies must submit the FNS-191 Racial/Ethnic Group Participation Report to ODJFS no later than May 31st. This federal report compiles the racial/ethnic group participation in CSFP for the month of April in any given year. A Local Agency completes the report, profiling all participants receiving a food box in the month of April. ODJFS submits all of the reports via the Federal Program Reporting System (FPRS).

Damaged and Out-of-Conditioned CSFP Foods

Local Agencies will report all incidents of damaged and/or out-of-condition CSFP product to ODJFS on the Report of Storage Losses and/or Damages. Out-of-condition products are CSFP foods that are no longer fit for human consumption as a result of spoilage, contamination, infestation, adulteration, or other damage. Bulging cans or cans with sharp dents or rust on the seams are examples of out-of-condition products. Hidden damage may be found after the product has been accepted into the warehouse. The information required is:

- Local Agency or Local Distributor name;
- Address;
- USDA product information (material number, amount, date received);
- Type of damage or loss;
- Contact Person; and
- Date damage/loss discovered.

PROGRAM MONITORING

On-Site Visits

ODJFS is responsible for on-site monitoring of Local Agencies. The purpose of the

monitoring process is to evaluate program operations. The process includes, but is not limited to, a review of:

- Eligibility determination process.
- Food ordering procedures.
- Warehousing and storage facilities.
- Inventory control.
- Distribution and transportation.
- Approval of Local Distributors (member agencies).
- Network training and monitoring.
- Reporting and record keeping.
- Compliance and civil rights.

The review is also used to provide technical assistance for program improvement. The monitoring visit also provides an opportunity for the Local Agency to ask questions, discuss concerns and make suggestions about the program. ODJFS follows the federal program regulations set forth in 7 CFR 251.10(e) and 7 CFR 247.34 when determining the number of reviews conducted annually at participating agencies. ODJFS issues a report of review findings detailing recommended and/or required corrective action to the participating agency within 30 days of the completion of the review.

Corrective Action Plans

The participating agency will have forty-five days to respond to the findings and document compliance with corrective action. The state agency will evaluate the adequacy of the corrective action plan and follow-up with the grantee food bank to ensure corrective action measures are implemented. The state agency will send the participating agency written notification of closure of the review.

ODJFS and/or USDA may visit the state agency and any Local Agency or Local Distributor at its discretion for review purposes.

FINANCIAL MANAGEMENT

State agency staff determine administrative and grant funding allocations necessary for successful program administration within the limitations of the USDA grant.

Funds are made available to each Local Agency foodbank through grant agreements with ODJFS. The grant agreements specify the services to be performed according to federal regulations, the State Plan of Operation and the Ohio Food Programs Manual. The State agency staff generate reports of financial data monthly and reviews all financial data against the CSFP grant to ensure all activity is allowable under the program.

The State agency staff ensures the quality and timeliness of financial data reported to USDA, FNS. The State agency staff retrieves applicable financial activity from the State accounting system, prepares and submits required financial reports, responds to questions concerning the data, and maintains adequate documentation to support the reported data.

All program records are maintained for a period of five years from the close of the federal fiscal year to which they pertain or longer if related to an audit or investigation in progress. The records must be reasonably accessible at all times for use during management evaluations, site reviews, audits or investigations. The records are subject to be reviewed and audited by the ODJFS and or USDA during normal business hours or be sent to ODJFS and/or USDA upon request.

COMPLAINTS

ODJFS, Local Agencies and Local Distributors must promptly investigate discrimination complaints received in connection with the distribution of USDA foods. All agencies shall maintain a record of complaints, investigations and resolutions. USDA reserves the right to conduct investigations and make the final determination on the proper handling of all complaints.

CIVIL RIGHTS and NONDISCRIMINATION

Civil Rights

The program is open to all eligible persons regardless of race, color, national origin, (including gender identity and sexual orientation), sex, age, or disability. All agencies are required to post at their facility, in plain sight, Form AD-475A “And Justice For All” poster available on the web at <https://www.fns.usda.gov/cr-justice-all-posters>.

All CSFP information materials and sources, including websites, used by Local Agencies and Local Distributors to inform the public about CSFP are required to contain the full non-discrimination statement. It is not required that the non-discrimination statement be included on every page of the program website. At a minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information. When the material is too small to permit the full non-discrimination statement to be included, the material shall, at a minimum, include the following statement in print size no smaller than the text: “This institution is an equal opportunity provider”.

Civil Rights Training

ODJFS provides annual Civil Rights training for Local Agencies in accordance with FNS Instruction 113-1. Local Agencies are responsible for participating in the annual training and training their Local Distributors and front line staff who interact with program applicants or participants. The Local Agency must document in an agency service file:

- Names of staff in attendance
- Brief summary of information provided.

Provisions for Non-English or Limited-English Speakers

Local Agencies and Local Distributors are required to develop a plan to ensure the LEP population has meaningful access to all USDA and/or state funded programs. The plan shall include:

- A determination of the language(s) other than English that is/are most likely to be encountered at the facility(ies).

- An explanation of the methodology used to make the languages determined to be LEP.
- The methods for providing service to the LEP population. Examples include, but are not limited to:
 - Bi-lingual or multi-lingual staff employed by the agency.
 - Contract with a third-party entity who provides interpreting and/or translation services.

Local Agencies and Local Distributors shall review their LEP Plan every two years and update accordingly.

ATTACHMENTS:

1. Ohio Department of Job and Family Services Subgrant Agreement with Akron-Canton Regional Foodbank
2. Ohio Department of Job and Family Services Subgrant Agreement with Country Neighbor Program
3. Ohio Department of Job and Family Services Subgrant Agreement with Freestore Foodbank
4. Ohio Department of Job and Family Services Subgrant Agreement with Greater Cleveland Foodbank
5. Ohio Department of Job and Family Services Subgrant Agreement with Mahoning Valley Foodbank
6. Ohio Department of Job and Family Services Subgrant Agreement with Mid-Ohio Food Collective
7. Ohio Department of Job and Family Services Subgrant Agreement with Second Harvest Foodbank of Clark, Champaign and Logan Counties
8. Ohio Department of Job and Family Services Subgrant Agreement with Second Harvest Foodbank of North Central Ohio
9. Ohio Department of Job and Family Services Subgrant Agreement with Second Harvest Foodbank of Southeastern Ohio
10. Ohio Department of Job and Family Services Subgrant Agreement with The

Foodbank

11. Ohio Department of Job and Family Services Subgrant Agreement with Shared Harvest Foodbank

12. Ohio Department of Job and Family Services Subgrant Agreement with Toledo Seagate Foodbank

13. Ohio Department of Job and Family Services Subgrant Agreement with West Ohio Foodbank

Laura A. Harper

(Signature)

1/22/2025

(Date)