



**FOOD BANK**  
*of* **ALASKA**

The Emergency Food Assistance Program  
Policy and Procedures Manual

Updated June 2018



# About the Program

## Introduction and Overview

Thank you for partnering with Food Bank of Alaska as a TEFAP distribution agency. Through this program, your agency can receive and distribute nutritious foods to low-income individuals and families in your community. TEFAP food is free to participating agencies and to clients who need food assistance. The work you do in your community is invaluable to the mission of ending hunger in Alaska.

The Emergency Food Assistance Program (TEFAP) is a United States Department of Agriculture (USDA) program administered by states. It has deep ties to the agricultural industry and has been available since 1981. TEFAP provides commodity food to families and individuals in need and has become an integral part of anti-hunger efforts.

FBA is responsible for ordering TEFAP commodities for our partners, coordinating delivery, ensuring that commodities are handled properly by partner agencies, and collecting and maintaining records and reports on all commodities distributed to eligible families and individuals.

TEFAP agencies are responsible for storing and maintaining inventory, distributing TEFAP commodities equitably and free of charge to individuals for home use, and for maintaining client records and program paperwork.

## Background and History

TEFAP was originally created as the Temporary Emergency Food Assistance Program, the result of hunger advocates lobbying the federal government for use of surplus commodities purchased by USDA for price supports. In 1981, President Ronald Reagan signed an executive order providing states with a onetime distribution of surplus cheese. This action succeeded with a win-win situation for the government, which reduced storage costs, and for those in need, who received food surplus.

Distributions continued for several years, and grew to include a variety of foods purchased for price support purposes. Because TEFAP was primarily an agricultural program, some foods were packaged in bulk commercial sizes not necessarily intended for individual or family consumption. States received food allotments derived from a formula based on the number of people in poverty in the state.

There was a significant change to TEFAP in the late 1980's. A new agriculture bill cut the price support program, which supplied the source of commodity foods. However, TEFAP was seen as a benefit to farmers as well as an anti-poverty program and it was popular with legislators. Therefore, instead of eliminating the program congress modified it through the 1988 Hunger Prevention Act. The act directed USDA to purchase foods for TEFAP.

In 1990, TEFAP became a permanent federal program and the "T" in the program name was changed from "Temporary" to "The" to reflect this change. TEFAP continues to be favorably regarded for the support it provides to farmers and producers, as well as for the nutritious food supply it provides to low-income families.

## Administration

The TEFAP Policy and Procedures Manual is the policy manual for the Food Bank of Alaska TEFAP distribution program. Grantees and sub grantees of the TEFAP program are required to follow the regulations and follow the procedures included in this manual. These regulations and procedures are based on the federal regulations 7 CFR 250 and 7 CFR 251. The regulations in Section 250 apply to all commodity distribution programs and those in Section 251 are regulations specific to TEFAP.

### Federal Administration

The Welfare Reform Act of 1996 authorizes The Emergency Food Assistance Program (TEFAP) for all states. The Food and Nutrition Services (FNS) of the United States Department of Agriculture (USDA) administers the program.

### State Administration

In Alaska, the Department of Early Education Development, Office of Child Nutrition Services administers the TEFAP program.

Member agencies of the food banks that are deemed eligible for distributing TEFAP commodities can receive commodities for distribution to low-income individuals and families. Sites must comply with membership agreements with Feeding America Food Banks.

According to Federal Law, a non-profit organization that may receive TEFAP commodities is one that:

- Has obtained recognition of tax-exempt status under the Internal Revenue Code; or
- Has made application for recognition of such status and is moving toward compliance with the requirements for recognition of tax-exempt status; or
- Currently operates another Federal program requiring tax-exempt status.

The distribution site must design distribution site access to meet community and cultural needs, in a permanent location with appropriate food storage and provide food with enough variety to constitute meals for persons in need.

### Federal Allocation to States

USDA uses a formula based on number of households below the poverty level and number of unemployed persons in each state (weighted 60% and 40%, respectively) to allocate the administrative funds, the entitlement funds, and the bonus commodities to states.

### State Allocation to the Food Banks Commodities

USDA commodities are allocated to the food banks based on a formula that calculates a percentage using the number of persons in poverty and the population in each food bank's service area (weighted at 60% poverty and 40% population). The data for this formula is taken from the most recent census.

### Administrative Funding

- USDA provides administrative funding for “transporting, storing, handling, processing, and distributing commodities” and for other administrative costs incurred in the distribution of TEFAP commodities.
- Gross weights are determined by the USDA Commodity File Listing. If the commodity or the package gross weight is not listed in the Commodity File Listing, the gross weight will be set by

DEED-CNP based on the Forwarding Notice and the Bill of Lading. The official weights are listed in the TEFAP Web Page database.

- Food banks are reimbursed per gross pound of TEFAP commodities received at the food bank for distribution by that food bank. In the event that deliveries of commodities are in excess of the administrative funding available, food banks are obligated to continue receiving and distributing the commodities.

### Ordering Commodities from USDA Entitlement Commodities

- USDA allocates money to each state for commodity purchase based on a formula. This is an entitlement amount and each quarter states are offered a number of commodities from which to order and use entitlement funds.
- DEED-CNP forwards the list of commodities to FBA Program department along with the amount (about one-fourth of the total entitlement).
- The TEFAP coordinator at DEED-CNP places the orders with USDA – Web Based Supply Chain Management (WBSCM).

### Bonus Commodities

- USDA may offer bonus commodities throughout the year. Bonus commodities are those that USDA purchases for price support purposes and are not charged against the entitlement allocation.
- When USDA offers a bonus commodity, and if timing makes it possible, FBA will survey the food banks for acceptability of the commodity and willingness to take the allocation.
- The offer of a bonus commodity may require a quick turnaround making it impossible to contact and receive information from all food banks. In those instances, FBA and DEED-CNP will make decisions based on past distribution and knowledge of food bank needs.

## Program Requirements

### Agency Eligibility

Food pantries eligible to receive TEFAP commodities for distribution must:

- Be a public or nonprofit organization.
- Provide food to persons in need.
- Have read and signed the Alaska TEFAP Site Distribution Agreement.

### Household Eligibility

- TEFAP Income Eligibility is 185% of the Federal Poverty Guideline.
- DEED-CNP annually provides Feeding America Food Banks and food pantries with updated federal poverty guidelines.

The chart below shows current income guidelines for TEFAP. Please note that these guidelines can change annually. FBA will distribute new guidelines as they become available.

Household Size	Annual Income
1	\$28,083
2	\$38,073
3	\$48,063
4	\$58,053
5	\$68,043
6	\$78,033
7	\$88,023
8*	\$98,013

*\*For each additional member add \$9,990*

Income is considered money received by any member of the household before such deductions as taxes and Social Security including the following:

- Salary or wages
- Earnings from self-employment including fishing and farming
- Strike benefits
- Unemployment
- Welfare (but not food stamp benefits)
- Child support and alimony
- Social Security
- Pensions and retirement
- Disability payments
- Permanent Fund Dividend
- Other cash income received.

NOTE: Income does NOT include food stamp benefits; any household receiving food stamps is automatically eligible to receive TEFAP commodities.

To calculate annual income for 2017-2018 TEFAP applicants:

1. Take all income received by all members of the household during the month prior to application and multiply by 12 months.
2. IF this income was much higher or lower than usual, the expected income for the year (12 months starting from the month prior to application) should be used.
3. Add \$1000 for each person in the household receiving a PFD in 2017.

### Categorical Eligibility

Applicants that currently receive benefits from the following programs are automatically eligible to receive TEFAP benefits.

- Food Stamps (SNAP)
- TANF (Temporary Assistance for Needy Families)
- SSI (Supplemental Security Income)
- CSFP (Commodity Supplemental Food Program)

- FDPIR (Food Distribution Program on Indian Reservations)

The income eligibility guidelines for TEFAP are the same for all of the above programs, which makes any applicant on one or more of these programs automatically eligible for TEFAP.

### **Self-Declaration of Household Makeup and Income**

The State of Alaska accepts self-declaration as a means of documenting eligibility. No other documentation is needed to meet TEFAP requirements. Persons receiving USDA food products from a food pantry must submit a TEFAP household application to attest that they meet the income eligibility guidelines. The only other allowable factor of eligibility is residency in the State of Alaska. Signing the TEFAP household application places responsibility on the recipient for their own eligibility.

Food pantries are not required to verify client income. A household self-declares that their income falls within the income limits. Clients may qualify to receive USDA TEFAP commodity food if they are participating in any of the programs listed on the TEFAP household application. People are eligible for TEFAP commodity food in an emergency situation or distress due to a disaster as determined by DEED-CNP.

Clients must submit a TEFAP household application once per year. However, food pantries must keep a record of names and household information each time a client receives TEFAP. It is required that clients provide a signature upon receipt of TEFAP food on the Certification of Eligibility & Receipt of TEFAP Commodities. The TEFAP eligibility forms and household application must be kept on file for four years.

- Distribution sites may (but are not required to) ask for proof from recipients that they reside within the distribution site's designated area of service. Driver's License, state identification card, and utility bill with recipients address or any item that verifies recipient's identity and residency are allowed. Only one form of documentation is needed and does not need to include a photo.
- Distribution sites may not ask for social security numbers, pay stubs or income data from recipients. The State of Alaska uses an affirmative declaration for households to self-declare household makeup and income.
- In some instances, food pantries request additional information from program participants to provide other types of services, such as housing assistance, medical care, or clothing. If the participant wants only to receive TEFAP commodities, the food pantry must use the state-established criteria (TEFAP household application) in order to determine eligibility for participation in the program.
- USDA Regulation includes a requirement that households must reside in Alaska. At the discretion of the food pantry any eligible Alaska resident can be served.

### **Civil Rights and ADA Compliance and Complaint Procedures**

Food pantries receiving TEFAP commodities must be in compliance with USDA Civil Rights Regulations. In accordance with Federal law and USDA policy, food pantries are prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. Food pantry staff and volunteers must receive annual training on the Civil Rights in accordance with FNS Instruction 113-1. Local agencies must post a complaint notice with a telephone number advising clients that they may contact the DEED-CNP or the Food Bank of Alaska in the event of a complaint.

Food pantries are required to comply with the Americans with Disabilities Act (ADA). DEED-CNP requires that local agencies have an ADA plan on file. The ADA requires that barriers that prohibit people who are disabled from obtaining TEFAP commodities be removed if “readily achievable,” that is, without great difficulty or expense. The primary goal should be to allow access to the services provided by the site if access to the facilities cannot be achieved.

To file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.htm](http://www.ascr.usda.gov/complaint_filing_cust.htm), 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 by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, DC 20250-9410, by fax (202) 690-7442 or email at [program.intake@usda.gov](mailto: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.

The “And Justice for All” poster must be posted in clear view of all TEFAP Clients. Reports of alleged discrimination should be mailed to the USDA address listed on the poster. DEED-CNP may be assigned to investigate such allegations on behalf of USDA.

A written grievance procedure must be posted where it can easily be seen by recipients. A policy must be in place, approved by the board and posted for recipients to know the process to use should there be a grievance.

### **Access for non-English speakers**

Entities that administer TEFAP are prohibited from providing unequal treatment in priority, quality or method of service. To ensure meaningful access for people with limited English proficiency, service providers must make free language assistance available that results in accurate and effective assistance. A mix of language assistance services should be based on what is reasonable and necessary in the area served to ensure meaningful access by Limited English Proficiency (LEP) customers to critical services.

This requirement relates to participants who cannot or do not make an appointment for services for any reason including for participants who do not speak English or English is not a first language.

### **Supplemental Nutrition Assistance Program (SNAP)**

The distribution site must have SNAP (Food Stamp/Food Support) information and referrals available, consistent with federal TEFAP requirements.

### **Intake Process**

Distribution sites must maintain an intake process that allows a pathway for people that want only food, for walk-ins, for people who do not speak English, and for homeless people who may not have access to a phone or means to make an appointment. Consultation with an outreach worker must be voluntary and cannot be required in order to receive food in accordance with USDA Regulations 7CFR Part 251.10 Limitation on unrelated activities.

USDA Federal Regulations do not allow TEFAP distributions sites/food pantries to place additional requirements for participants, in addition to requirements stated in this document. Additional forms, meetings with outreach workers and other processes must be voluntary. There must be a pathway for

participants to access food with the lowest possible barriers in compliance with USDA's limitation on unrelated activities.

Full and meaningful access for all participants including walk-ins, homeless or others without a phone or participants who do not speak English and may not be able to make an appointment on the phone, is required.

### **Fees**

Distribution sites cannot charge fees or require membership as a condition for receipt of commodities. Requests for donations, donation boxes, bins, envelopes, etc., shall not be in view, or accepted at the time of client service.

The requirement of membership in any organization (church, political, fraternal, union, block club, etc.) or attendance of same as a requisite for receipt of commodities is not allowed.

### **Solicitation and Membership Required**

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

### **Fraud**

The sale, exchange, or use of commodities for personal gain or use as a means to further the political interest of any individual or party or any other form of fraud or abuse of commodities is subject to Federal and State prosecution.

### **Publicity**

The distribution site agrees it will publicize within its designated area the hours the site is open to make potential participants aware of the availability of food assistance. Methods to publicize hours include, but are not limited to, placing notices in local newspapers, posters or pamphlets. Distribution sites must have a phone message informing clients of hours of services provided and must advise the food bank of regularly scheduled hours of operation.

### **Homeless**

Distribution sites must to serve homeless recipients and use discretion in providing the types of foods that are appropriate, easy to use and prepare. Homeless persons may lack documentation to verify identity or residence. In case of lack of documentation for homeless persons, the distribution site should indicate "none" in the address section of the signature sheet.

### **Investigations**

Distribution sites agree to cooperate fully with FBA and DEED-CNP in the investigation of all complaints received in connection with the distribution of commodities. The distribution site agrees to correct any irregularities disclosed. The distribution site shall report promptly, in writing to FBA and to DEED-CNP detailing all corrective measures taken.

## Sale of Commodities

USDA requires agencies to give commodities to eligible households at no charge. Selling commodities or trading commodities 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 may not make political appearances at distribution site's hours of service. Campaign literature and signs must not be evident. Bags or boxes advertising candidates or political causes may not be used to carry commodities and staff may not wear buttons or political inspired apparel.

## Religious Proselytizing

Religious proselytizing in any form is prohibited at the time USDA TEFAP commodity food is being distributed. TEFAP distribution sites may not require any religious activities or religious instruction in order for a participant to receive a food package or a prepared meal containing USDA commodity food. DEED-CNP may be assigned to investigate such activities or allegations.

## Commodities as Compensation

Volunteers and staff are entitled to USDA products only if they meet income eligibility requirements. Eligible volunteers and staff may not be given extra food to encourage their help. Issue rates established by the outlet must not be exceeded for volunteers.

## Household Distribution

Many agencies in Alaska are authorized to distribute TEFAP commodities for household distribution. To be eligible, households must be at or below 185% of the current federal poverty guidelines or be eligible for programs such as SNAP (Food Stamps,) Temporary Assistance to Needy Families (TANF), Supplemental Security Income (SSI), Commodity Supplemental Food Program (CSFP ) or The Food Distribution Program on Indian Reservations (FDPIR). Most household distribution programs are administered through the Food Bank of Alaska.

## Types of Food

In combination with food donated by individuals and businesses, TEFAP commodities help provide a well-rounded food package for food pantry visitors. TEFAP food consists of a variety of canned and dried goods, fresh and frozen fruit, and meat and dairy products.

TEFAP food is high in quality and nutritional value. TEFAP products include items not often donated to food banks or food pantries. Some goods are too costly to purchase at retail value, so their availability through the TEFAP program allows food pantries to obtain certain foods that are important to people. Recently USDA launched an initiative to purchase foods that are low in sodium and sugar. This effort seeks to further improve the quality and nutrition of TEFAP.

## Bonus Food

TEFAP commodities consist almost entirely of purchased food, the result of changes to agriculture policy in the late 1980's. At the federal level, TEFAP is authorized to buy food to support struggling industries. In this case, goods are designated as "bonus" because they were provided in addition to the regular allocated dollar value of TEFAP. Bonus products are often more expensive fresh fruits and meat. Through

TEFAP bonuses, additional food products are made available and offer tremendous benefit. However, due to the erratic nature of bonus products, the amount of food received each year varies widely. Bonus commodities change due to economic issues. USDA sometimes steps in to purchase commodity goods to support producers.

## Ordering and Receiving Commodities

TEFAP commodities are ordered by the State of Alaska. Food Bank of Alaska uses a Fair Share system to determine the quantity of commodities that each agency will receive. Your allocation is based on the numbers of individuals you serve quarterly as reported in the “Monthly TEFAP Report” and how that relates to the total individuals served by FBA’s TEFAP program.

### Orders

All agencies are to keep an updated “TEFAP Agency Capacity Form” on file with FBA. Any restrictions that you have on product you cannot receive (because of storage capacity, client preferences, etc.) must be stated on this form.

When you receive an order or shipment, please be sure to follow these steps:

1. Immediately count and record the types of product received and the quantity of each.
2. Record that information so that it can be entered on the TEFAP Monthly Inventory Report. This information should be compared to the invoice you receive upon delivery of your commodities.
3. Check the product for damages and record any damages on the TEFAP Monthly Inventory Report in the Loss/Gain column.
4. Notify FBA immediately with any discrepancies, damages, questions or concerns. It is also important to list these discrepancies on the TEFAP Monthly Inventory Report in the Comments/Explanations section.
5. Clearly mark each case of a food item with the date of receipt so that it is easier to identify when an item arrived.
6. Put the new product away on your shelves and in your refrigerators/freezers BEHIND any existing TEFAP inventory. The purpose of this is to follow First In, First Out (FIFO) procedures.

Agencies located in Anchorage and Mat-Su (agencies that pick-up or receive delivery from FBA) that are unable to accept and store their full allocations, may store a limited amount of product at the FBA warehouse. Stored inventory can be accessed by placing an order with the Director of Food Programs. Orders should be placed a week before your regularly scheduled delivery day. Stored product that is not accessed within three (3) months will be reallocated to other TEFAP agencies.

For all local agencies, it is the agency’s responsibility to ensure they have the proper storage space to store the commodities per food safety guidelines. It is also the agency’s responsibility to ensure there is someone on site to receive the delivery. Please monitor your inventory and manage it accordingly.

### Commodity Shipping

There is no charge for TEFAP commodities distributed by DEED-CNP to eligible member direct service agencies, however a recipient agency may be liable for shipping expenses. Commodities are shipped at no

charge to the recipient agencies to the following locations: Anchorage, Bethel, Dillingham, Fairbanks, Juneau, Ketchikan, Kodiak, Kotzebue, Mt. Village, Sitka, Soldotna, Unalakleet, and Wasilla.

Recipient agencies located outside of these distribution points must make shipping arrangements for commodities products. If commodities are not picked up within 48 hours, they will be delivered to the recipient agency and an additional charge may be imposed.

## Food Storage and Handling

When delivery of commodities occurs, the food pantry assumes responsibility for the safekeeping of commodities until the commodities are given to eligible recipients. This obligation includes proper distribution and any loss or damage caused by failure to provide proper storage, care and handling. DEED- CNP may require the food pantry to replace donated food in kind or re-pay the value of the donated food as determined by USDA. Losses must be immediately reported to DEED-CNP and FBA.

The food pantry must have secure and adequate facilities for proper storage and distribution for all commodities. Storage facilities and temperature must meet state and local health department standards. The food pantry must assure that foods are held in a secure, adequate and proper storage facility prior to distribution. Storage is to be rodent and insect free.

### General Principles of Food Storage and Handling

Food storage should provide protection from weather, fire, theft and pests. Aisles between pallets should be wide enough to provide easy access for inspection, inventory and pulling of product. All USDA commodities are to be stored at the food pantry. Food pantries must follow good warehouse and storage practices and meet applicable rules and regulations. Practices include, but are not limited to:

- Keep food six inches off the floor, on pallets, platforms or shelves.
- Keep food four inches away from walls to allow good air circulation and pest control.
- Keep non-food items separate from food. Toxic items (soap, bleach, cleaning supplies, etc.) must be kept separate from food items.
- Keep floors, pallets and shelving clean.
- Keep doors, windows, and roofs well sealed to prevent pest entry and water damage.
- Maintain a good pest control system. Have a qualified person on staff or contract with a licensed firm to handle pest control management.
- Maintain equipment, regularly check for leaky compressors in freezers and refrigeration units; hydraulic forklift leaks, etc.
- Maintain proper temperatures. Thermometers must be kept in the freezer, and refrigeration units and dry storage areas. Maintain temperature logs.

### Storing Dry Commodities

Dry commodities must be stored:

- In cool areas (50 to 75 degrees F).
- Away from direct sunlight.
- At a minimum of six inches off the floor.
- At least six inches away from walls.
- With at least a two foot ceiling clearance to avoid high temperatures at ceiling; and storage area must be clean, secure and inspected regularly.

## Storing Refrigerated and Frozen Commodities

Commodities requiring refrigeration must:

- Be kept at temperatures between 34 to 40 degrees F.
- Be stored allowing for proper air circulation; and be stored in a refrigeration unit that is clean and inspected on a regular basis.

Frozen commodities must:

- Be stored in a freezer that can maintain a temperature below 0 degrees F.
- Be stored to allow for proper air circulation.
- Be stored in a freezer unit that is clean and inspected on a regular basis.

## Food Bank Storage Guidelines for Stacking Commodities

The basic rules for stacking commodities are:

- Limit the height of the stack so cases of food on the bottom layers will not be crushed: cross-stack cases on pallets to ensure the stack will be sturdy and solid and will not tip when being moved.
- Shrink wrapping provides added stability.
- Stack cases away from potential damage by heat, steam or water.

## Maintenance of Storage Area

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

- Poisons must not be used except by a licensed professional. Prevent rodent infestation by thoroughly cleaning and maintenance.
- Ensure there is a cleaning schedule established listing the 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 spoiled by spillage or breakage must be cleaned immediately. Broken pallets should be discarded and dirty pallets cleaned.
- The exterior should be inspected regularly for signs of fire hazards, pest infestation, security problems and repairs. Garbage, waste or rubbish must be disposed of frequently and not allowed to become nesting areas for pests.

## Rotation of Stock

To help assure the quality and freshness of USDA commodities, the practice of first in/first out (FIFO) must be followed. Food must be stored so cases with the oldest pack dates are used first. All USDA commodities have the pack date on the case. Pack dates or lot numbers are also printed or stamped on individual cans or containers. Staff must routinely asset inventory levels to assure that supplies are reasonable and appropriate for distribution activities.

## Product Packaging Dates

As a general rule, distributing agencies should use a first in, first out (FIFO) system of inventory management. Distribution agencies should also be aware of dates placed on food products by the manufacturers that help to determine how long food products can be expected to remain in optimal condition. Such product dates must be considered, along with FIFO, in management of donated food inventories. Listed below are the different types of packaging dates that can appear on food products.

### Expiration and Use-by Dates

Generally, “expiration” dates and “use-by” dates are the last dates that the manufacturer recommends a food item be consumed to ensure peak quality and nutrient retention. However, there is no regulation requiring that manufacturers mark their product with such dates.

The one exception to these general rules is infant formula. The Food and Drug Administration (FDA) requires manufacturers mark infant formula with a “use-by” date. Additionally, the FDA prohibits the sale of infant formula after the use-by date.

In accordance with FDA rules, infant formula that is past its use-by date must not be distributed to program recipients. Similarly, per manufacturer recommendations regarding other foods, other TEFAP commodities that are past their expiration date or use-by date must not be distributed to program recipients. Accordingly, distributing agencies must manage their inventories to ensure that program recipients have an opportunity to consume all TEFAP commodities before their expiration dates or use-by dates have passed.

### Best-if-used-by Dates

A “best-if-used-by” date is the last date a food item will be at its peak, in terms of flavor and quality. At some point after that date, the product will begin to undergo changes in taste, color, texture, and/or nutrient content. However, the product may be wholesome and safe to consume, and retain most of its nutrient value, long after the “best-if-used-by” date. Nevertheless, distributing agencies must consider “best-if-used-by” dates in managing their TEFAP commodity inventories, and distribute TEFAP commodities in a manner that allows them to be consumed by such date.

### Sell-by Dates and Pack Dates

A “sell-by” date is the date by which the manufacturer recommends that a store sell the food product, and is not necessarily a reliable indicator of how long it may retain its wholesomeness or nutritional value.

A “pack-date” indicates when the product was packaged or processed. While it may help to determine the age of the product, it does not necessarily provide useful information on its wholesomeness or nutritional value.

### Damaged and Out-of-Condition Product

Out-of-condition product(s) are those commodities, which appear to have come from the packer contaminated, deteriorated, spoiled, infested or having latent defects. All commodities must be inspected upon receipt. Bulging cans or cans with sharp dents and rust on the seams are examples of out-of-condition products.

## Re-packing

USDA products may not be repackaged unless specific instructions to the contrary are issued by DEED-CNP.

## Commodity Liability

When physical delivery of commodities is taken, the food pantry assumes responsibility for the safekeeping of product. The food pantry also assumes responsibility for the value of the commodities should loss occur due to negligence in storage, theft, and/or handling. Although commodities 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 commodity to states. In order to guarantee quality and safety, each food pantry is responsible for the proper storage and handling of USDA commodities. Premature deterioration of commodities is often the result of improper storage conditions and practices. Every effort must be made to reduce loss due to spoilage, pest infestation and theft by following accepted warehousing methods. This action not only ensures quality products being distributed but also protects the food pantry from claims action by the State of Alaska or USDA to recover the value of the spoiled or lost product.

Food pantries will not be held liable for product quality except in cases of negligence on their part. Food pantries will be held liable if they knowingly distribute commodities that are spoiled, especially if the spoilage occurred because of negligence on their part.

## Recordkeeping

### USDA Inventory Report

All agencies are required to keep track of the receipt, use, and inventory of all USDA commodities. To account for receipt of USDA commodities, all order receipts, which itemize USDA commodities received, must be kept for a minimum of three (3) years after the current year.

To account for the use and inventory of USDA commodities, a "USDA Inventory Report" form must be completed twice a year; January through June is due July 31, and July through December is due January 31 of each year. Child Nutrition Services will send this form out to all recipient agencies. Failure to complete the Inventory Report may result in temporary suspension from ordering commodities.

The report must include agency name, recipient ID number, and the name and phone number for the person responsible for release of the USDA commodities for use. Amounts may be reported either all in units or in full cases with loose units listed separately.

The report is to be completed as follows (by commodity):

**Amount on Hand as of Jan 1**— the count at the beginning of the year (or mid-year). This number should always agree with the count at the end of report submitted (the numbers should simply be forwarded).

**Amount Received** — Fill in the number of cases of each commodity received in the 6 month time period from USDA/Child Nutrition Services.

**Transfer In** – Add any authorized transfers received from another agency and note agency name at the bottom of the page.

**Transfer Out Line 3** — Deduct any authorized transfers sent to another agency and note agency name at the bottom of the page. Child Nutrition Services must pre-authorize any transfer. This column may also be used for spoilage/loss but a note must be made at the bottom of the page and a Loss Report must have been submitted at the time that the loss was noted.

**Amount Used** — Enter the amount of each commodity removed from inventory for meal preparation. Note: A system needs to be in place to record units removed from inventory as they are taken for use in meal preparation.

**Amount on Hand as of July 1 (or January 1)** — adding the first 3 lines and reducing by the last two lines. This number should be confirmed by a physical inventory.

## Records Management

All TEFAP records must be maintained on-site. The records are held for three years past the current year. USDA inventory reports shall be made available to federal or state staff upon request.

## Agency Orders and Inventory Management

FBA's TEFAP partners in Anchorage and the Valley have regularly scheduled TEFAP deliveries. Prior to the delivery, FBA staff informs them of what they have available to them (i.e., what has been allocated to them that they have not yet used). Agencies order what they would like on the delivery. Inventory may be held for agencies for up to three months, and then it rolls into a "community pot". The Community Pot may then be distributed to other agencies. FBA typically prioritizes adding the Community Pot to rural orders, but it can be made available to local sites as well.

FBA sends orders to rural partners approximately once a quarter and sends the full allocations those agencies have in inventory, plus anything we can add from the community pot.

Partners should manage their inventory for it to last about three months. Items should not be on their shelves longer than six months. Depending on the amount of TEFAP coming in to the State at any given time, there may be periods when sites have a lot of food and need to bump up the distribution on some of their inventory and times when they are low and need to cut back.

## Food Distribution

Household agencies distribute commodities to clients once a month. It is up to agencies whether they would like to have one distribution a month or multiple, but clients may only receive TEFAP once a month. Distribution amounts for each commodity are set by the State and distributed through FBA. Sites may distribute less than what is on the guidelines at their prerogative, but they must have approval from the State to distribute more than what is on the guidelines.

FBA promotes client choice shopping as a best practice; agencies may also do pre-packed boxes. They are encouraged to offer a share table for items that clients do not want or cannot use from their box. Those items may then be picked up by another client or donated back to the pantry.

Proxies are allowed to pick up food for clients; they do need a letter and ID to do so.

There are no restrictions on people participating in TEFAP and any other State or Federal programs.

## Monthly Reporting

### Agency Reporting

TEFAP agencies are responsible for submitting monthly reports to FBA by the 5<sup>th</sup> of every month for the prior month. They must include the Monthly Inventory Report (MIR) and the Distribution Sign-In sheets. FBA records the household totals and is responsible for ensuring that the sign in sheets match the MIR. If an agency is delinquent in reporting for two months, the agency will be placed on product hold until the reports are submitted. These policies are outlined in the TEFAP manual.

MIR's must be accurate – the ending inventory from one month should match the beginning inventory of the next. If there are discrepancies, they should be noted in the “notes” section of the report. If there are any losses or gains, those must also be explained. These are typically things like error correction from previous months, product getting lost/damaged, etc. If there are large quantities of lost or damaged product, the agency should fill out a Commodity Loss Report.

An important note – in the event that an agency does not open for reasons such as the community being at fish camp, not having enough food to distribute, medical emergencies, etc., FBA uses the numbers served from the last month that had service. This is so that agencies (and ultimately clients) are not “punished” by having less food due to low service numbers for reasons beyond their control, or for culturally appropriate closures. This does not include things like staffing turnover or not having enough people trained to administer the program.

### Training Requirements

Distribution site personnel are expected to attend training and meetings sponsored by FBA and Feeding America in order to ensure compliance with USDA Civil Rights, and other state and federal regulations.

### FBA's Annual Training and Materials

FBA conducts training for its partner agencies each September. All materials must be updated and approved by the State and then sent to all agencies. An emailed zip file followed by a hard copy in the mail works well. Materials should be sent with plenty of time for agencies to complete the paperwork in them and submit it to FBA. FBA can place agencies on hold if they do not have all of their paperwork in.

Annual training is conducted in September as well. Additionally, FBA staff train new agency staff as needed either when there is staff turnover or when a new site comes on board.

## Monitoring

The State of Alaska is required to conduct monitoring visits of all TEFAP agencies. The State will provide the agency reasonable notice of the visit and information on the scope of the on-site evaluation. The purpose of the on-site visit is to ensure your agency complies with all food storage, record keeping and program operations requirements. Recommendations will be offered for program improvement where necessary to support smooth operation, ensure proper record keeping practices, and protect the integrity of TEFAP and TEFAP commodity products.

Monitoring visits are also opportunities for your agency to provide feedback on TEFAP product acceptability, distribution procedures and suggestions for improvement.

If there are any deficiencies or areas of concern, the State of Alaska will send a letter summarizing the findings of the site review within 30 days of the visit detailing corrective action that needs to be taken by the agency and setting a time period for achieving compliance. The agency must respond within 30 days stating actions taken to correct deficiencies.