



**STATE PLAN OF PROGRAM OPERATIONS AND
ADMINISTRATION OF
THE COMMODITY SUPPLEMENTAL FOOD PROGRAM**

2025

This document represents the administration plan of the Commodity Supplemental Food Program in the State of Maine. Under State law, and by agreement with the U.S. Department of Agriculture, the Maine Department of Agriculture, Conservation and Forestry is the state distributing agency in Maine for USDA Foods related to CSFP.

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I. LOCAL AGENCY IDENTIFICATION

The following agencies have signed an agreement with the Maine Department of Agriculture, Conservation and Forestry to operate the Commodity Supplemental Food Program in Maine in 2025:

Good Shepherd Food Bank (as distributing agency, not allocated caseload)
3121 Hotel Road
Auburn, Maine 04210

Catholic Charities Maine
307 Congress St
Portland, ME 04108
[Commodity Supplemental Food Program | Catholic Charities of Maine](#)

Central Maine Agency on Aging, dba Spectrum Generations
One Weston Court
Augusta, Maine 04338
<https://www.spectrumgenerations.org/nutrition-services/usda>

Eastern Area Agency on Aging
240 State St, Brewer, ME 04412
<https://eaaa.org/commodities-supplemental-food-program/>

Wayside Food Programs
PO Box 1278
Portland, ME 04104
<https://www.waysidemaine.org/government-food-programs>

Western Maine Community Action
20 Church Street, PO Box 200
East Wilton, Maine 04234
<https://www.wmca.org/community-services/senior-food-program/>

II. CERTIFICATION

A. Eligibility Requirements

- 1) To be certified as eligible to receive supplemental foods each applicant must meet the following criteria:
 - a. Elderly individuals certified on or after September 17, 1986, shall be sixty (60) years old or older with household income at or below One Hundred Fifty percent (150%) of the annually published federal poverty income guideline. If a higher income guideline becomes allowable, Maine would choose the highest allowable rate to ensure we can maximize access. Elderly individuals certified prior to September 17, 1986, shall be subject to the terms and conditions in effect on the date

of their certification.

b. Income eligibility determinations can be conducted and shall be based on the gross monthly household income of the family unit. The definition of a family is an economic unit which generally means a group of related or nonrelated individuals who share all significant income and expenses of its members. The economic units are characterized by the sharing of expenses, such as food, housing, medical costs and household insurance expenses. Roommates who do not share living expenses other than rent and utilities would not count in the applicant's household size.

- 2) Monthly income is defined as gross income before required or voluntary deductions.
- 3) For CSFP eligibility purposes, the following items are counted as income, per [7 CFR 246.7\(d\)\(2\)\(ii\)](#):

Definition of "Income". Income for the purposes of this part means gross cash income before deductions for income taxes, employees' social security taxes, insurance premiums, bonds, etc. Income includes the following—

- (A) Monetary compensation for services, including wages, salary, commissions, or fees;
- (B) Net income from farm and non-farm self-employment;
- (C) Social Security benefits;
- (D) Dividends or interest on savings or bonds, income from estates or trusts, or net rental income;
- (E) Public assistance or welfare payments;
- (F) Unemployment compensation;
- (G) Government civilian employee or military retirement or pensions or veterans' payments;
- (H) Private pensions or annuities;
- (I) Alimony or child support payments;
- (J) Regular contributions from persons not living in the household;
- (K) Net royalties; and
- (L) Other cash income. Other cash income includes, but is not limited to, cash amounts received or withdrawn from any source including savings, investments, trust accounts and other resources which are readily available to the family.

From the federal regulations, states are permitted to **exclude** the following from counting as income. DACF has elected to [exclude from income](#) for the purposes of CSFP eligibility:

- a) Basic allowance for housing received by military services personnel residing off military installations; and
- b) The value of inkind housing and other inkind benefits.

[The following are federally required to be excluded as income:](#)

(1) Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Pub. L. 91–646, sec. 216, [42 U.S.C. 4636](#));

(2) Any payment to volunteers under Title I (VISTA and others) and Title II (RSVP, foster grandparents, and others) of the Domestic Volunteer Service Act of 1973 (Pub. L. 93–113, sec. 404(g), [42 U.S.C. 5044\(g\)](#)) to the extent excluded by that Act;

(3) Payment to volunteers under section 8(b)(1)(B) of the Small Business Act (SCORE and ACE) (Pub. L. 95–510, sec. 101, [15 U.S.C. 637\(b\)\(1\)\(D\)](#));

(4) Income derived from certain submarginal land of the United States which is held in trust for certain Indian tribes (Pub. L. 94–114, sec. 6, [25 U.S.C. 459e](#));

(5) Payments received under the Job Training Partnership Act (Pub. L. 97–300, sec. 142(b), [29 U.S.C. 1552\(b\)](#));

(6) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94–540, sec. 6);

(7) Payments received under the Alaska Native Claims Settlement Act (Pub. L. 100–241, sec. 15, [43 U.S.C. sec. 1626\(c\)](#));

(8) The value of assistance to children or their families under the National School Lunch Act, as amended (Pub. L. 94–105, sec. 9(d), [42 U.S.C. sec. 1760\(e\)](#)), the Child Nutrition Act of 1966 (Pub. L. 89–642, sec. 11(b), [42 U.S.C. sec. 1780\(b\)](#)), and the Food and Nutrition Act of 2008 (Pub. L. 95–113, sec. 1301, [7 U.S.C. sec. 2017\(b\)](#));

(9) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of the Yakima Indian Nation or the Apache Tribe of the Mescalero Reservation (Pub. L. 95–433, sec. 2, [25 U.S.C. 609c–1](#));

(10) Payments to the Passamaquoddy Tribe and the Penobscot Nation or any of their members received pursuant to the Maine Indian Claims Settlement Act of 1980 (Pub. L. 96–420, sec. 6, 9(c), [25 U.S.C. 1725\(i\)](#), [1728\(c\)](#));

(11) Payments under the Low-income Home Energy Assistance Act, as amended (Pub. L. 99–125, sec. 504(c), 42 U.S.C. sec. 8624(f));

(12) Student financial assistance received from any program funded in whole or part under Title IV of the Higher Education Act of 1965, including the Pell Grant, Supplemental Educational Opportunity Grant, State Student Incentive Grants, National Direct Student Loan, PLUS, College Work Study, and Byrd Honor Scholarship programs, which is used for costs described in section 472 (1) and (2) of that Act (Pub. L. 99–498, section 479B, 20 U.S.C. 1087uu). The specified costs set forth in section 472 (1) and (2) of the Higher Education Act are tuition and fees normally assessed a student carrying the same academic workload as determined by the institution, and including the costs for rental or purchase of any equipment, materials, or supplies required of all students in the same course of study; and an allowance for books, supplies, transportation, and miscellaneous personal expenses for a student attending the institution on at least a half-time basis, as determined by the institution. The specified costs set forth in section 472 (1) and (2) of the Act are those costs which are related to the costs of attendance at the educational institution and do not include room and board and dependent care expenses;

(13) Payments under the Disaster Relief Act of 1974, as amended by the Disaster Relief and Emergency Assistance Amendments of 1989 (Pub. L. 100–707, sec. 105(i), 42 U.S.C. sec. 5155(d));

(14) Effective July 1, 1991, payments received under the Carl D. Perkins Vocational Education Act, as amended by the Carl D. Perkins Vocational and Applied Technology Education Act Amendments of 1990 (Pub. L. 101–392, sec. 501, 20 U.S.C. sec. 2466d);

(15) Payments pursuant to the Agent Orange Compensation Exclusion Act (Pub. L. 101–201, sec. 1);

(16) Payments received for Wartime Relocation of Civilians under the Civil Liberties Act of 1988 (Pub. L. 100–383, sec. 105(f)(2), 50 App. U.S.C. sec. 1989b–4(f)(2));

(17) Value of any child care payments made under section 402(g)(1)(E) of the Social Security Act, as amended by the Family Support Act (Pub. L. 100–485, sec. 301, 42 U.S.C. sec. 602 (g)(1)(E));

(18) Value of any “at-risk” block grant child care payments made under section 5081 of Pub. L. 101–508, which amended section 402(i) of the Social Security Act;

(19) Value of any child care provided or paid for under the Child Care and Development Block Grant Act, as amended (Pub. L. 102–586, Sec. 8(b)), 42 U.S.C. 9858q);

- (20) Mandatory salary reduction amount for military service personnel which is used to fund the Veteran's Educational Assistance Act of 1984 (GI Bill), as amended (Pub. L. 99–576, sec. 303(a)(1), 38 U.S.C. sec. 1411 (b));
- (21) Payments received under the Old Age Assistance Claims Settlement Act, except for per capita shares in excess of \$2,000 (Pub. L. 98–500, sec. 8, 25 U.S.C. sec. 2307);
- (22) Payments received under the Cranston-Gonzales National Affordable Housing Act, unless the income of the family equals or exceeds 80 percent of the median income of the area (Pub. L. 101–625, sec. 522(i)(4), 42 U.S.C. sec. 1437f nt);
- (23) Payments received under the Housing and Community Development Act of 1987, unless the income of the family increases at any time to not less than 50 percent of the median income of the area (Pub. L. 100–242, sec. 126(c)(5)(A), 25 U.S.C. sec. 2307);
- (24) Payments received under the Sac and Fox Indian claims agreement (Pub. L. 94–189, sec. 6);
- (25) Payments received under the Judgment Award Authorization Act, as amended (Pub. L. 97–458, sec. 4, 25 U.S.C. sec. 1407 and Pub. L. 98–64, sec. 2(b), 25 U.S.C. sec. 117b(b));
- (26) Payments for the relocation assistance of members of Navajo and Hopi Tribes (Pub. L. 93–531, sec. 22, 25 U.S.C. sec. 640d-21);
- (27) Payments to the Turtle Mountain Band of Chippewas, Arizona (Pub. L. 97–403, sec. 9);
- (28) Payments to the Blackfeet, Grosventre, and Assiniboine tribes (Montana) and the Papago (Arizona) (Pub. L. 97–408, sec. 8(d));
- (29) Payments to the Assiniboine Tribe of the Fort Belknap Indian community and the Assiniboine Tribe of the Fort Peck Indian Reservation (Montana) (Pub. L. 98–124, sec. 5);
- (30) Payments to the Red Lake Band of Chippewas (Pub. L. 98–123, sec. 3);
- (31) Payments received under the Saginaw Chippewa Indian Tribe of Michigan Distribution of Judgment Funds Act (Pub. L. 99–346, sec. 6(b)(2));
- (32) Payments to the Chippewas of Mississippi (Pub. L. 99–377, sec. 4(b));
- (33) Payments received by members of the Armed Forces and their families under the Family Supplemental Subsistence Allowance from the Department of Defense (Pub. L. 109–163, sec. 608); and

(34) Payments received by property owners under the National Flood Insurance Program (Pub. L. 109–64).

(35) Combat pay received by the household member under Chapter 5 of Title 37 or as otherwise designated by the Secretary.

- 4) Eligibility determinations shall be made based on income received by the household during the month prior to application. If the income received during the month before application is not representative of current income, the certification staff may consider income received for a longer period of time, up to the past year, if it more accurately reflects the applicant household's current situation. See [7 eCFR §247.9](#)
- 5) CSFP income eligibility may be demonstrated by applicants above 150% of federal poverty guidelines if they are participating in any of the following five federal programs:
 - The Supplemental Nutrition Assistance Program (SNAP),
 - The Food Distribution Program on Indian Reservations (FDPIR),
 - Supplemental Security Income (SSI),
 - The Low-Income Subsidy Program (LIS), and
 - the Medicare Savings Programs (MSP).
- 6) Per 7 CFR 247.9(b)(3), applicants who are determined to be income eligible based on their participation in any of the five above programs shall not be subject to the income limits set at 7 CFR 247.9(b). CSFP local agencies should not request additional income information (e.g., monthly income) from participants who are determined to be income eligible via another Federal or State-level program per 7 CFR 247.9(b)(1) or (2). To demonstrate income eligibility via participation in federal programs conferring CSFP income eligibility, the State will allow self-attestation of the applicants' participation.
- 7) Participants must report changes in household income or composition within 10 days after the change becomes known to the household, unless the change does not affect eligibility. This also includes notifying the local agency if a loss of eligibility occurs for one of the five federal programs above if participation was used as CSFP income eligibility.
- 8) No nutritional risk requirement or criteria shall be imposed. The State intends not to restrict eligibility beyond what is federally required.
- 9) No fixed residency or duration requirement shall be imposed as a condition for eligibility.
- 10) Certification site staff may verify and document participants' income, identification,

age, and residency before certification if deemed necessary. Identification does not need to include a photo. Allowable types of identification or verifiable documents include, but are not limited to:

- a. Driver's License or other state-issued identification card;
- b. Birth certificate;
- c. Medicare/ Maine Care card;
- d. Check/pay stubs or statement from employer verifying wages;
- e. Award letter or other official document, verifying participation in a federal, state, or local program for low-income persons.
- g. Tribal ID from federally recognized tribes residing in Maine
- f. A Social Security card **IS NOT** an acceptable source of verification.

11) Documentation of verification may be a copy of the information provided, or a notation on the application with an indication of what type of identification was seen.

12) Re-certification: Certification is valid for 3 years. **Annually**, each distribution site shall coordinate with its local agency, which is the month in which the local agency will monitor the site. During this visit, local agency staff will check in with participants and verify their continued interest in the program, as well as their addresses and phone numbers. Re-certification can happen at this time if it has been 2 years since applicants last signed up or last certification. During recertification, staff will assist participants in filling out a new CSFP application.

B. Assessment

On the CSFP application, participants are allowed to self-identify race and ethnicity. If the participant chooses not to self-identify race and ethnicity, the certifier must record it based on visual observation. This information is entered into the computer during certification and submitted to DACF each year when the FNS-191 report is due.

C. Certification Notification

The local agency shall either certify the applicant, or notify eligible applicants that they have been put on a waiting list, or notify the applicant of eligibility or ineligibility for the program within 10 days of the applicant's first visit to the local agency to apply for participation in the program. Notification will be mailed unless specifically requested by the participant to be emailed. A person determined as eligible shall receive supplemental foods at the next monthly distribution if the caseload allows or be put on the waiting list.

D. Termination/Ineligibility

Written notification to participants of termination/ineligibility will be sent 15 days prior to the termination date. This notice will include the reason for termination, ineligibility and the participants' right to a fair hearing, including the method to request the fair hearing and the right to be represented at the hearing. The documented reasons for

ineligibility are held on file by the local agency. Applicants will be advised of their rights, including nondiscrimination, fair hearings, and nutritional education.

E. Waiting Lists

Local agencies should contact the State Office before placing potential participants on a waiting list, as additional slots may be available. The State Office is responsible for ensuring that the State's assigned caseload is fully maximized. Therefore, caseload assignments to local agencies may be shifted from one region to another to ensure 100% statewide participation.

F. Rights and Responsibilities

The local agency is responsible for informing the applicant, orally or in writing, of the following. These items are embedded in the statewide CSFP application:

I AGREE TO:

- Provide proof of my income, address, and identification if requested.
- Give staff correct information about my current household and its income.
- Let staff know if my address, income or household composition changes or if I plan to move within 10 days.

I UNDERSTAND THAT:

- CSFP will provide supplemental foods.
- The CSFP local agency will provide information on other nutrition, health, or assistance programs, and make referrals as appropriate.
- The CSFP local agency will provide nutrition education to all program participants and will encourage participation.
- I will be dropped from this program if I participate in another CSFP.
- I have the right to appeal through the fair hearing process, any decision made by the local agency regarding denial, disqualification, or termination from the program.
- If I do not pick up food 2 months in a row, without telling staff, I will be taken off the Program if there is a waiting list.
- I may be taken off the program if I sell or barter with CSFP foods.
- I may be taken off the program if I intentionally make false or misleading statements, orally or in writing.
- I may be taken off the program for intentionally withholding information pertaining to eligibility in CSFP.
- I may be taken off the program if I physically abuse or threaten to physically abuse program staff.
- Improper use or receipt of CSFP benefits due to dual participation or other program violations may lead to a claim against you to recover the value of the benefits. It may also lead to disqualification from CSFP

III. DISTRIBUTION AND USE OF CSFP COMMODITIES

- A. Good Shepherd Food Bank will receive in all freight and build boxes (see fuller explanation in part VIII (A)). GSFB will coordinate with local agencies to schedule and deliveries. The local agency will distribute a CSFP box of food to all clients 60 years of age or older at next monthly distribution after receiving a certified application.
- B. The local agency must require each participant, or participant's proxy, to present some form of identification before distributing CSFP foods to that person. To keep records current, the best contact information including participant's phone number and address (and if applicable, proxy phone number) will be verified monthly during distribution.
- C. Applicants shall have their contact information confirmed each month during distribution. Applicants shall be recertified at least every three years. Each distribution site will work with its local agency to determine a month every year to check in with its clients. During this check-in, local agencies shall:
 - (1) Verify the address and continued interest of the participant; and
 - (2) Have sufficient reason to determine that the participant still meets the income eligibility standards, which may include a determination that the participant has a fixed income.
 - (3) Seek feedback about CSFP foods or anything in the CSFP process.
 - (4) Recertify interested applicants if they are within 1 year of expiration of certification.

Staff will verbally ask participants if there have been any changes in their income or household size at each recertification. Verification of address can also be done verbally during the annual checks.

- D. Local Agencies must not require, or request, that participants make any payments, or provide any materials or services, in connection with the receipt of CSFP. State and local agencies must not use the distribution of CSFP as a means of furthering the political interests of any person or party.
- E. CSFP foods may not be used for outreach, refreshments, or for any purposes other than distribution to, and nutrition education for, CSFP participants.

IV. CASELOAD MANAGEMENT & CERTIFICATION PERIOD

- A. There is an inherent need to have a management system to effectively and efficiently control caseload to ensure caseload is not surpassed .
 - 1. The waiting list policy is established when the program has reached or is very near its maximum caseload.
 - 2. The waiting list will include:
 - a. Applicant's name and status,
 - b. Address

- c. Telephone number
- d. Date applicant is placed on list.

B. Local agencies should contact the State Office before placing potential participants on a waiting list, as additional slots may be available. The State Office has a responsibility to ensure that the State’s assigned caseload is fully maximized. Therefore, caseload assignments to local agencies may be shifted to ensure 100% statewide participation. Every effort should be made to provide CSFP benefits to the neediest applicants. When the maximum caseload has been reached, the local agency must keep a list of all potential applicants who contact the agency and apply. Applicants should be informed of the income standards, process, and waiting list at the initial contact to avoid later screening effort. Certification from waiting lists will be on a first come, first served basis and a waiting list notification letter must be sent within 10 days of receipt of application. While waitlists are in effect, local agencies may offer temporary certifications to new applicants. This would allow for some participants to get a box on a month-to-month basis if a current participant is not able to get their box. Once a caseload slot opens, a temporarily certified participant would be able to fully enroll.

C. A form denoting the period of certification will be given to each participant upon approval of the application.

D. Applicants shall have their contact information confirmed each month during distribution. Applicants shall be *recertified every three years*. Recertification is done by either having the applicant/proxy/staff fill out a new form or just the 2nd page to capture a new signature and write in other changes from page 1. If a local agency has an abridged version they’d like to use, they may send requests for review to the State Office. Recertifications must capture all the information from [247.8](#), including a signature (which may be paper or electronic). Furthermore, each distribution site will work with its local agency to determine a month every year to check in with its clients. During this **annual** check-in, local agencies must:

- (1) Verify the address and continued interest of the participant; and
- (2) Have sufficient reason to determine that the participant still meets the income eligibility standards, which may include a determination that the participant has a fixed income.

Staff will verbally ask participants if there have been any changes in their income or household size at each recertification. Verification of address can also be done verbally during the annual checks.

E. CSFP demand is dynamic, and the state will assess caseload allocation as needed. In times with waiting lists, caseload allocation will be considered monthly. DACF hosts a quarterly virtual meeting with local agencies and the food bank. During the fall virtual meeting, DACF will gather input regarding caseload from local agencies if we are eligible to apply for more statewide caseload. As of this writing, Maine’s caseload is 5,302 participants, but due to an expected reduction in funding, the tentative aim is to serve 5,170 participants. The State believes this level is manageable to achieve at least 95% participation levels of the 2024 caseload. We believe we have growth potential

beyond our caseload but do not want to bite off more than we can chew and anticipate a funding reduction.

V. OUTREACH

- A.** The State Agency administering CSFP also administers TEFAP. TEFAP participants aged 60 and over will be screened for possible eligibility for this program. Criteria of eligibility will be posted at distribution sites, and announcements will be made through present communication channels.
- B.** CSFP information will also be available to Maine Office of Elder Services programs provided by the Local Area Agencies on Aging and the Meals on Wheels food delivery program. This is a great way to expand CSFP to the homebound.
- C.** Coordinate and communicate client information between the Senior Farmers Market Nutrition Program (known as the Maine Senior FarmShare Program in ME) and CSFP to capture eligible clients. DACF created a postcard cross-promoting both programs and will offer them to any library, town office, area agency on aging, or any other establishment willing to take a stack. CSFP distribution sites and farmers' markets will also hand out postcards to ensure awareness of both programs and spread the word.
- D.** Our CSFP partners' websites, social media accounts, and DACF's GovDelivery.
- E.** News articles, television, and radio broadcasting.
- F.** We host quarterly meetings amongst DACF, GSFB, and local agencies. Outreach is a standing topic.

VI. NUTRITIONAL EDUCATION

Nutritional education is a dynamic process through which health and dietary information is exchanged with the individual in a manner which will promote both his/her knowledge and application of the dietary practices required for attaining and maintaining positive nutritional and health status. In order to be effective nutrition education must be tailored to the needs, interests, experiences, capabilities, and life styles of the individuals or groups taking part in this process. Nutrition education stresses the promotion of the dietary guidelines and reduction of the risks of disease. CSFP Program nutrition education should be integrated into and coordinated with other community nutrition programs.

A. Assessment of Nutritional Education Needs

1. Prior to initiation of nutrition education services, the CSFP staff must determine if the participant is receiving nutrition education services through other

community based nutrition programs.

2. CSFP participants who are not receiving nutrition education services from another source must be assessed for:

- a. Known risk factors which can be affected by nutritional practices or diet therapy
- b. Adequacy of the food supply and other sources of food assistance
- c. Usual dietary intake by food frequency, diet recall, or food record

B. CSFP Nutrition Education Services

1. Nutrition education is to be considered a benefit of the program and is to be provided to each participant at no cost. Nutrition education may be provided by another community based nutrition program.

2. Participants must be encouraged to participate in nutrition education services, and the long term benefits of utilizing such services must be stressed.

3. No participant shall be denied supplemental food for failure to participate in the nutrition education services offered through the CSFP or other community nutrition programs.

4. Nutrition education must be offered to all adult participants and must include:

- a. An explanation of the importance of the consumption of the supplemental foods by the participant.
- b. Reference to any special nutritional needs of participants and ways to provide an adequate diet.
- c. Information on the use and nutritional value of supplemental foods.
- d. Referral to other social and health programs when indicated.

5. A nutrition education contact is defined as an activity designed to improve health status, achieve positive change in dietary habits, and/or emphasize relationships between nutrition and health, all in keeping with the individual's personal, cultural, and socioeconomic preferences.

- a. To ensure consistency, the local agency shall have written policies regarding basic nutrition for the elderly. Policies must be consistent with the dietary guidelines where applicable.
- b. A nutrition education contact may be provided through either individual or group education.
- c. A nutrition education contact may be made during a certification visit, visit for food pick-up, a home visit, etc. It is desirable to integrate/coordinate nutrition education services with health agency services and other nutrition education services offered in the community.

d. A nutritional education contact will usually involve a face-to-face encounter between the educator and the participant. If literature is given out or a film is shown it must be accompanied by discussion.

e. Nutritional education must be easily understood by the participant and practical in terms of the participant's household situation and cultural food habits.

f. Participants who are known to be at high nutritional risk should receive a level of nutrition intervention that is consistent with their degree of risk. The CSFP contact may refer high nutritional risk participants to the health department.

6. Nutritional education may be provided by:

- a. A nutritionist, home economist,
- b. Program participants (on voluntary basis)

7. Continuing education and training of local agency staff for the purpose of developing and/or updating the skills and knowledge necessary for the delivery of nutrition education to program participants is to be considered part of the nutrition education services provided through the local and state agencies.

C. Documentation of Nutritional Intervention

1. Where nutritional education classes or food demonstrations are offered, activity outlines should be developed. The suggested components of an outline include:

- a. Target audience
- b. Objectives
- c. Outline of the presentation
- d. Activities/materials used

2. Documentation of individual and/or group nutrition education should be an ongoing part of the participant record. Documentation should include, at the least, the following information:

- a. A summary of the basic content of the nutrition education provided or the topic of the class attended
- b. Date the nutritional education was provided and the signature and title of the person providing the service.
- c. A participant's refusal and/or inability to take part in nutritional education activities must be documented.

D. Evaluation

1. A review of CSFP nutritional education services will be conducted by the State Agency during Local Agency's review at least every other year and will include:

- a. A review of local agency written policies and procedures.
- b. A review of participant records

2. The local agency will establish an evaluation procedure to obtain the views of CSFP participants or their caretakers concerning nutrition services provided by the local CSFP agency. The purpose of the survey is to assist in program planning at the state and local level. The results of the survey will be shared at least annually to the state and will be discussed during inspection.

The procedure should be designed to obtain information regarding, but not limited to:

- a. Attitudes on the need for nutritional education
- b. Barriers to attendance at nutrition education sessions
- c. Topics participants are interested in learning about
- d. Preferred methods for delivery of nutrition education
- e. Impact of CSFP and CSFP foods on the household food choices

VII. FOOD STORAGE/DISTRIBUTION & RECORD KEEPING

A. Distributing Agency:

The Maine Department of Agriculture, Conservation and Forestry's Food Assistance Program, 28 State House Station, Augusta, Maine 04333 is the State Distributing Agency. The contracted food storage and production facility, Good Shepherd Food Bank (GSFB), has offices in Auburn and production facilities in Hampden, Maine. CSFP foods will be delivered to the Hampden warehouse. GSFB will provide storage for these commodities which will protect them from theft, spoilage, damage or destruction or other loss. The local agencies will place orders delivering from Hampden; the state will verify caseload and approve each month's orders, reassigning caseload allocation as necessary. Commodities are taken from the Hampden warehouse, put into 1 month supply boxes, and shipped to sub-distributors and designated CSFP distribution sites.

GSFB will review monthly menus and seek DACF confirmation to ensure maximum distribution rates per category are achieved. Variety will be emphasized, while prioritizing first-expires-first-out inventory management practices. Inventory will be distributed with at least 90 days remaining before best-if-used-by date to ensure the boxes have at least 60 days remaining when participants receive the food. Sub-distributing agencies will issue a pre-built CSFP box and cheese to participants monthly, distributing older boxes before newer ones if there are any leftover from the previous month. Participants arrive at designated distribution sites, and staff or volunteers record which participants receive CSFP.

The State and its local agencies will not require any participant to make payment or provide services in connection with receipt of CSFP commodities, and they will not use the distribution of CSFP commodities to further the political interests of any person or party.

Records will be maintained in a suitable place for three years from the close of the federal fiscal year to which they pertain, or longer if the records are related to unresolved claims actions, audits, or investigations. The U.S. Department of Agriculture and the Maine Department of Agriculture, Conservation and Forestry are authorized to inspect all program operations, including records and reports, at any reasonable time.

Physical inventories are taken via cycle counting at the Hampden facility. This includes regular checks and verifying counts and lot locations for all CSFP products. Frequency depends on lot location (high touch get counted weekly, other locations monthly). Annually, DACF will physically count all on-hand CSFP inventory and verify best-if-used-by dates are accurate in the system. Following the count is an after-action review and summary of accuracy of the system and inventory practices.

An inventory report will be sent to DACF monthly. DACF will review and verify for consistency, then upload relevant inventory information to assist with the FNS 153 report, which is sent to NERO via the Food Programs Reporting System (FPRS). The FNS-153 report uses data from Good Shepherd Food Bank and all the local agency distribution information for the given month.

Offsetting

Under section 250.14(c) of the Food Distribution Program regulations, all storage facilities at the DA level must be reviewed annually, and the DA must ensure that sub-distributing agencies conduct annual reviews of their storage facilities. Under section 250.14(e), DAs and sub-distributing agencies must perform a physical inventory as part of the annual review, and the physical inventory must be reconciled to the book inventory. Finally, under section 250.16(a)(1), DAs and subdistributing agencies must maintain complete and accurate records with respect to the receipt, distribution/use and inventory of donated foods. (Note: a school food authority that is a subdistributing agency but that does not warehouse donated foods for another recipient agency is not subject to these requirements.)

As a result of the physical inventory and reconciliation to the book inventory, it is possible that a DA or subdistributing agency storage facility will identify shortages and overages in the inventory of specific items of donated commodities. (A shortage occurs when the physical inventory count is less than the count from the book inventory; an overage when the physical inventory count is greater than the count from the book inventory.) The overages may be used, under the appropriate circumstances, to “offset” the shortages, thus reducing the total loss recorded, and also reducing any claim against the storage facility for the loss. This memorandum details how these shortages and overages may be handled as part of the reconciliation and claims

processes, and discusses how the reconciliation of physical and book inventories must be handled. The main points are:

- The DA must approve all proposed offsets;
- If the cause for a shortage can be determined, and if the loss results from theft, fraud, or negligence, then the shortage may not be offset and the loss must be reported as required in section 250.15(c);
- Offsets will be made on the basis of value and not weight;
- Commodities included in the offset are not required to be of like or similar kind;
- Bonus and entitlement commodities may be used for offsets;
- End products may be used for offsets – value to be used is the value of donated commodities in processed product, plus any processing fee; and
- Offsets may occur as part of the annual review, or as part of any reconciliation that meets the standards of an annual review (physical inventory, reconciliation to book inventory, DA involvement).

The total amount of donated commodities to be accounted for through the physical inventory and reconciliation is the sum of the ending inventory from the previous annual review (also known as the starting inventory for this review period) plus the total donated commodities received by the storage facility, per the records maintained by the DA. From this figure the total shipments from the storage facility, per the records maintained by the storage facility, should be subtracted, resulting in the ending book inventory for this review period, which is the total remaining inventory to be accounted for (the annual review should include a review of the records maintained by the storage facility to ensure the record of shipments out is properly maintained and can be verified). To recap, the starting inventory plus receipts minus disbursements equals the ending book inventory, which should equal the physical inventory at the time of the review. Any discrepancies between the ending book inventory and the physical inventory must be recorded and must be investigated by the storage facility to determine, if possible, the cause or causes for those discrepancies.

When the physical inventory is complete, the DA may consider, as part of the reconciliation process, whether to offset any shortages identified with any overages that are discovered. The DA should compile a complete list of the overages and shortages, and include the results of the investigation into the cause or causes of the discrepancies. If the cause of any shortage can be identified, and if it results from theft, fraud, or negligence, then the shortage may not be offset and must be reported as a loss under Section 250.15(c). The proposed offset must be on the basis of the value of the commodities, using the commodity values detailed in Section 250.13(a)(5). A consistent basis for valuation must be used throughout the reconciliation and offset process. DA approval is required for any proposed offset, and the DA may make any adjustments in the proposed offset it determines are in the best interests of the program.

There is no limitation on the overall value of offsets that could be allowed as part of a single reconciliation. However, in determining whether to approve the proposed offsets the DA should consider the following factors:

- The total value of the proposed offsets;
- The percentage of the total donated commodities involved in the proposed offsets;
- The desirability of the commodities identified as overages, and the ability to distribute those commodities efficiently and without waste;
- The previous history of offsets at the storage facility; and
- The investigation by the storage facility of the cause or causes for the discrepancies, and the results of that investigation

The offset process includes all donated commodities, including entitlement and bonus commodities, and may also include processed commodities. The commodities involved in the offset process are not required to be of like or similar kind, and overages and shortages in entitlement commodities may be offset with overages and shortages in bonus commodities. For example, an overage of \$250 of bonus orange juice may be used to offset a \$250 shortage of entitlement frozen meat. In addition, processed commodities may be included in the offset process, provided the correct valuation is used, which is the value of the donated commodities included in the end product, plus any applicable processing fee that was incurred. In short, the offset should be performed on the basis of all overages against all shortages (except those caused by theft, fraud or negligence) identified through the physical inventory and reconciliation process. Any remaining shortages must be reported as a loss under Section 250.15(c) and may result in a claim being filed against the storage facility. Any remaining overages remain the property of the program and must be included in the inventory for that program going forward.

Complete records of the reconciliation of the physical inventory to the book inventory, including any offsets that are applied, must be maintained as required under section 250.16(a)(1), and these records are subject to review by the FNS ROs. If it is determined, from a review of those records, that the DA improperly approved offsets, then a claim may be assessed against the DA under section 250.15(c) and FNS Instruction 410-1.

A storage facility that performs a full reconciliation at times other than the required annual review may be permitted to offset overages and shortages at those times, provided that the reconciliation performed meets the same standards as the reconciliation performed as part of the annual review. Thus, the DA would have to be involved in the reconciliation process, and the book inventory and physical inventory would have to be reconciled as indicated above. In addition, as noted above, DA approval is required for any offsets.

Valuation System for Audit Purposes

The value of USDA Foods must be considered when determining federal awards. The CE must

consider the following:

1. Federal awards received
 - Directly, from one or more federal agencies
 - Indirectly, via pass-through entities
2. Cash and non-cash awards
 - USDA Foods are a non-cash federal award

The value of USDA Foods must be considered part of federal awards.

For audit purposes, expended USDA Foods include those distributed or used during the relevant fiscal year.

The State has selected a method determining the value of USDA Foods via Food Programs Reporting System (FRPS). The State will use FNS-153 analyze function to determine monthly value of distributed foods. This is the CSFP version of the rolling average method referenced in policy memo FD-104. The State will send out emails in the fall, after being certain that September distribution totals are finalized. This calculated figure will inform the LAs of the cost value of each CSFP box, specific to month as well as averaged for that fiscal year. If a new system to assess CSFP box value arises the State still will inform all LAs of the price each fall for the most recently completed federal fiscal year.

The value applied to USDA Foods for audit purposes does not apply for other purposes.

For example: FNS Instruction 410-1 (Rev) is used when determining and pursuing claims for USDA Foods losses.

VIII. DETECTION & PREVENTION OF DUAL PARTICIPATION

Participants are to receive benefits from the CSFP clinic site closest to their residency and within their county's service area. Local agencies may make exceptions to this if the client is initially enrolling on the program and the next clinic date at their assigned site is not timely. The participant must agree to attend an alternative site belonging to this agency. Local agencies may also make exceptions for clients that find other sites more desirable due to transportation needs or proxy convenience. On a monthly occurrence, local agencies will enter roster data into their roster software. The software is set up to notify if a client is already in the system. Applicants outside the normal local agency area require staff to work with the other local agency to ensure there is no dual participation. Local agencies shall notify the State Office if they have any reason to suspect a participant may be participating in more than one CSFP program. The State Office will follow-up on the information provided to them.

IX. CLAIMS

The local agencies and subcontracted service providers are responsible for any improper or negligent issuance of supplemental foods and will make restitution for any improper or negligent authorization. When a loss of food occurs after delivery to the local CSFP agency, a claim determination must be made. If the value of the lost food exceeds \$500, documentation must be forwarded to the USDA FNS Regional Office for concurrence with a claim determination by DACF. If the CSFP agency or contracted vendor is found to be negligent, or the loss occurred as a result of theft, embezzlement, willful misapplication, or fraud DACF must pursue a claim for the value of the food, or forward the claim determination to the USDA Northeast Regional Office (USDA-NERO) for further action, regardless of the value of the loss. All claim payments must be paid by check, payable to Maine Department of Agriculture, Conservation & Forestry. The SDA will not assess any claim against the local agency or a CSFP participant less than \$500.00 or against charitable institutions unless the loss was due to theft, fraud, or willful misapplication. The SDA feels any other reason for a claim less than \$500.00 is not cost-effective to pursue.

If the State Agency determines the loss didn't result from action or negligence by a specific party (for example, if the loss occurred because of a natural event, such as a hurricane or flood, or a general power outage), it is not required to pursue a claim or to forward a claim to USDA-NERO for further action. However, the State Agency must notify USDA-NERO if the value of such a loss exceeds \$500.

If a party is responsible for the loss, the State Agency must pursue further claim actions if the loss exceeds \$500 and notify USDA-NERO.

X. HOMEBOUND

1. Homebound elderly participants are eligible for CSFP and can sign up via their local distributing agency but it is the participant's responsibility to have a proxy deliver the commodities for them.
 - a. A proxy form signed by the participant, the proxy and a CSFP staff member must be on file for proxy pickup. The state imposes no limit to the number of participants a proxy may assist.
 - b. The CSFP participant is responsible for informing the proxy of food distribution schedules. Maintaining accurate contact information is imperative. Establishing alternate or backup contact information is encouraged.

2. Certain Meals on Wheels participants with a documented need may have a home delivery option if the Local Agency offers this service.
3. Rideshare 3rd party delivery services are acceptable if the driver gets training, including civil rights, and can verify ID of the participant during delivery. If a participant is not home, the box must be returned to the CSFP distribution site and stored in a protected manner, prioritizing cheese refrigeration.

XI. SDA’S CONTRACTS WITH GSFB & LA’S.



Catholic Charities
FY25 CSFP CT 202406



Eastern Area Agency
on Aging FY24 CSFP (Bank



Good Shepherd Food
FY25 CSFP CT 21



Spectrum
Generations FY25 CSF



Wayside Food
Program FY25 CSFP (C



Western Maine
Community Action FY