

PARTNER AGENCY GUIDEBOOK



Updated: March 2023

TABLE OF CONTENTS

About the Central Texas Food Bank	3
Contact Information	3
Food Bank Sourcing	4
Partner Agency Requirements – Overview	5
Ordering, Warehouse, and Delivery Procedures	7
Handling Fees & Payments	11
Partner Agency Food Sourcing	12
Agency Operations	14
Food Storage & Handling	19
Client Eligibility & Application	22
Civil Rights	25
Grievances	30
Partner Agency Training Requirements	30
Partner Agency Record Keeping	31
Monthly Reporting	34
Holds, Suspension, Termination, & Appeal Processes	36
Programs & Resources	37

ABOUT THE CENTRAL TEXAS FOOD BANK

The Central Texas Food Bank is at the front line of hunger relief with the help of a network of more than 250 Partner Agencies in 21 counties across Central Texas. Our mission is *“To nourish hungry people and lead the community in the fight against hunger.”*

The Central Texas Food Bank is an affiliate of the Feeding America nationwide network of Food Banks. Through our Feeding America affiliation, the Central Texas Food Bank is accountable for providing the highest standards of food storage and handling, record keeping, and accurate donation tracking. In addition, we follow guidelines set by the United States Department of Agriculture (USDA), Texas Department of Agriculture (TDA), and the Internal Revenue Service (IRS).

The Food Bank appreciates that our partner agencies demonstrate a commitment to serving those who are at risk of food insecurity and are additionally dedicated to adhering to all Food Bank policies and procedures explained in this policy manual.

CONTACT INFORMATION

Physical address: 6500 Metropolis Dr., Austin, TX 78744

Telephone Number: 512-282-2111

Network Services Hotline: 512-684-2503

Fax: 512-282-6606

Network Services Email: agencies@centraltexasfoodbank.org

<https://www.centraltexasfoodbank.org/agencies/resource-center>

Please contact the Network Services team to ensure that all appropriate contacts for your agency are on our email distribution list. We send important updates and announcements on a regular basis.

Kara Hedlund	Director of Network Services	512-684-2133 737-212-4045 cell	khedlund@centraltexasfoodbank.org
Ann Do	Network Standards and Capacity Coordinator	512-684-2134 512-809-4037 cell	ado@centraltexasfoodbank.org
Sophia Copeland	Network Standards and Capacity Coordinator	512-684-2511 512-800-0920	scopeland@centraltexasfoodbank.org

Valerie Guerra	Network Standards and Capacity Coordinator	512-220-2731 512-800-0726 cell	vguerra@centraltexasfoodbank.org
----------------	--	-----------------------------------	----------------------------------

FOOD BANK FOOD SOURCING

FEEDING TEXAS/FEEDING AMERICA

The Food Bank works with the Feeding Texas and Feeding America networks to receive donated or low cost loads of food, which typically have a cost associated to them for freight and value-added processing (VAP). These loads are typically the result of a large surplus that one food bank could not distribute alone. A large amount of produce is sourced through these networks. Items received through this channel are distributed to Partner Agencies and programs at either no cost or up to \$.19/pound handling fee.

USDA TEFAP COMMODITIES

The Food Bank receives staple food items, such as shelf-stable milk, rice, beans, cereal, and canned goods through The Emergency Food Assistance Program (TEFAP), which is a federal emergency food program administered through the USDA. CTFB must allocate and distribute USDA Food to Priority 1 Partners. CTFB has ninety days to meet Priority 1 Partner needs before allowing access to Priority 2 Partners.

Priority 1 Partners: Provide emergency food assistance (i.e. hunger relief agencies, soup kitchens, and like-agencies; food pantries; alternate and additional Food Banks; and shelters for families, children or battered women).

Priority 2 Partners: Provide non-emergency food assistance (i.e. group treatment centers and other group living arrangements; charitable institutions, including hospitals and retirement homes; summer camps for children; or child nutrition programs providing meal service).

PURCHASED CO-OP FOODS

The Food Bank budgets funding for shelf-stable staple food items for Partner Agencies and programs in order to fill the gaps when needed. For example, if we know we will not be receiving any canned vegetables in a given month through TEFAP, we may decide to purchase a truckload of canned vegetables. CTFB works with vendors to buy in bulk and ensure the lowest prices possible. Then, these items are made available to Partner Agencies at a Co-Op price, usually about a 10% mark-up, but still cheaper than retail.

PURCHASED PRODUCE

The Food Bank purchases loads of fresh produce at discounted rates, which are distributed to Partner Agencies and programs at no cost. Often times, these loads are offered at a lower cost to us because they are imperfect, but still good to eat, such as “seconds” or loads with a small percentage of decay.

FOOD RESCUE

The Food Bank receives donations from local grocery stores, distributors, manufacturers, farms, and other food industry companies. These donations are no longer valuable to the donor due to short dates, surplus, cosmetic damage, or other reasons, but are still good and safe for people to eat. Agency Retail Pickup (ARP) (page 13) food rescue is the same concept, but with authorized Partner Agencies picking up directly from the donor and reporting pounds to the Food Bank.

FOOD DRIVES & EVENTS

The Food Bank receives many shelf-stable, dry grocery donations through a variety of community food drives and events (ex: Souper Bowl of Caring and Stuff the Bus).

PARTNER AGENCY REQUIREMENTS – OVERVIEW

GENERAL PARTNER AGENCY REQUIREMENTS

- Abide by policies and procedures set by The Central Texas Food Bank, USDA, TDA, Feeding America, and the IRS.
- Maintain status as a federally exempt 501(c)(3) organization or 501(c)(3) equivalent serving people in need, children, or the unwell (page 31).
- Practice the safe and proper storage and handling of food product, which conforms to all local, state and Federal regulations (page 19).
- Maintain [operational, administrative, and client records](#) (page 31). Track service totals and submit monthly reports in a timely fashion (page 34).
- Maintain required trainings regarding civil rights, client confidentiality, and food handling for applicable staff and volunteers (page 30).
- Adhere to all distribution and operational requirements (page 14), including verifying client eligibility to receive product (page 22) and distributing product free of charge.
- Prohibit staff and volunteers of the program from discriminating against any person on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age or reprisal or retaliation for prior civil rights activity.

- Require that staff and volunteers of the program show respect to all clients, and respond to complaints appropriately (page 28). Inferior, degrading or otherwise disrespectful communication to clients will not be tolerated
- Allow the Food Bank, Feeding America, and TDA to monitor food distributions, meal services, and agency records.
- Inform the Food Bank of any changes in contact information in a timely manner.

TYPES OF PARTNER AGENCIES

There are three categories of Partner Agencies: Food Pantries (PA) distribute shelf-stable and perishable product for household consumption. Onsite Kitchens (OS), such as soup kitchens, residential programs, shelters, and snack-only programs, prepare and serve meals on site. Onsite Kitchens/Food Pantries (OP) prepare and serve meals on site and distribute food for household consumption. Partners who prepare meals on site (OS/OP) are required to meet additional standards regarding health inspections and food safety training.

ANNUAL SITE VISITS

Partner Agencies will receive an annual site visit from the Network Services team. This visit will be scheduled with you to accomplish the following:

- Conduct an on-site, required compliance monitor.
- Identify challenges and opportunities of your partnership with CTFB.
- Meet with you and the dedicated volunteers/staff of the agency.
- Learn about the future plans of your agency – additional programs, wrap-around services, serving specific populations, changes to your organizations structure or leadership.

ORDERING, WAREHOUSE, AND DELIVERY PROCEDURES

ORDERING PROCEDURES

All Partner Agencies are assigned a specific day and time for food pick-ups and/or deliveries. Appointment times remain the same until your agency requests a change in advance. If a Partner Agency is unable to pick up at its appointed time, an agency representative must contact their CTFB Relationship Manager if you wish to reserve another pick up time.

Partner Agencies are required to routinely order food from the Food Bank. Partners with a six month ordering absence will forfeit partnership with the Food Bank. To regain access to food and other Food Bank resources, the organization will need to reapply as a new Partner Agency. The Food Bank will not notify

agencies with a pre-warning; it is up to each agency to ensure compliance with this policy (refer to page 35 for termination policies).

AGENCY EXPRESS

[Agency Express](#) is a web-based tool sponsored by Feeding America that allows Partner Agencies to process and manage Food Bank food orders online. Agencies can search for food items, view item details, submit orders and review the status of orders through this system. Items are available on the shopping list on a first-come first-served basis. Occasionally, the quantity of an item agencies are allowed to order will be limited.

DEADLINES FOR PLACING ORDERS

The below chart refers to all Partner Agency ordering, whether the food is received via pickup at the Food Bank, pickup at a regional delivery site, or through direct delivery.

Pick-up day	Ordering Window Opens	Ordering Window Closes
Monday	Wednesday 10:00 a.m. (the week prior)	Thursday 9:00 a.m. (the week prior)
Tuesday	Thursday 10:00 a.m. (the week prior)	Friday 9:00 a.m. (the week prior)
Wednesday	Friday 10:00 a.m. (the week prior)	Monday 9:00 a.m.
Thursday	Monday 10:00 a.m.	Tuesday 9:00 a.m.
Friday	Tuesday 10:00 a.m.	Wednesday 9:00 a.m.

SWAP (SUPPORTING WELLNESS AT PANTRIES)

Supporting Wellness at Pantries (SWAP) is a Stoplight Nutrition Ranking System that places foods into green, yellow and red categories based on nutrition guidelines. The SWAP system was designed specifically for use by food banks and food pantries who serve low-income families struggling with food insecurity. Research shows that households who go to food pantries are at high risk for chronic diseases such as type II diabetes, high blood pressure and obesity. These diseases are largely related to the foods we eat, specifically foods high in saturated fat, sodium and added sugar. Yet these diseases are preventable.

The goal of the SWAP system is to provide a practical way to implement nutrition standards, using clear and appropriately tailored nutrition guidance for the food bank and food pantry audience. SWAP provides detailed

guidelines for eight food groups with specific levels for saturated fat, sodium and sugar so they can be classified as green, yellow or red as follows:

- Green = Choose often; low in saturated fat, sodium and sugar; builds health
- Yellow = Choose sometimes; can contribute to health
- Red = Choose rarely; high in saturated fat, sodium or sugar; view as treats

To view the SWAP ranking, please click on the item detail to view the ranking in the extra info section of your shopping list.

CTFB PICK-UP PROCEDURES

- Partner Agencies must sign in at the CTFB Agency Dock check-in desk prior to all order and shop-for pickups.
- All agency staff and volunteers will need to be knowledgeable of the account name and account number.
- Food Bank staff reserve the right to contact any agency director to solicit permission on suspect representatives.
- Partner Agencies may back up their vehicle to an empty dock. Only two vehicles may be backed up to the dock at a time.
- Partner Agencies must adhere to all instructions given by Food Bank warehouse staff and regional drivers and treat them with respect.
- Partner Agencies that are more than 20 minutes late may not be allowed to add Shop-For items to their order. Agencies more than 20 minutes late without prior notification may be asked to reschedule the pick-up day at the discretion of warehouse staff.
- Partner Agencies have a maximum of 30 minutes to load and Shop-For.
- The Food Bank schedules two pick-up appointments every 30 minutes, so it is important that each Partner Agency loads its vehicle(s) in a timely manner.
- Partner Agencies that do not arrive at the designated pick-up time without contacting the Food Bank may be subject to a \$35 restocking fee. If a Partner Agency is unable to pick up at its appointed time, an agency representative must call the Network Services Hotline at 512-684-2503.
- Agencies are permitted to order for pick up at the warehouse during the weeks not scheduled for delivery, as scheduling allows.
- Partner Agencies are responsible for ensuring orders are correct. It is recommended that each case or box be checked by an agency representative as it is loaded into the vehicle. When an agency representative signs the order invoice, they accept it as correct and will pay the handling fee for all items
- Shortages on orders need to be reported to dock staff prior to leaving or no more than 24 hours after picking up the order in order to receive a product credit.
- Partner Agencies are required to return all CTFB banana boxes either to regional delivery sites or to the receiving docks at the food bank.

- Partner Agencies are responsible for loading orders. Only individuals loading the vehicle should be on the dock; all others should wait outside of the loading area.
- The Partner Agency should provide a vehicle(s) large enough to transport orders. The agency may be charged a \$35 re-stocking fee if it cannot pick up the entire order.
- Food Bank personnel reserve the right to limit the amount of product leaving the Food Bank dock if the product load appears to exceed the safety limitations of the vehicle's capacity.
- Partner Agencies without refrigerated vehicles or coolers with ice/cold packs must utilize insulated freezer blankets for transporting perishable food to comply with safe food handling policies.
- After all food is loaded, the Partner Agency representative must bring the signed copy of the invoice to the warehouse staff.
- Agency staff/volunteers are required to sign out before leaving.

WAREHOUSE & DOCK REGULATIONS

- Arrive no earlier than 20 minutes before your scheduled pick-up.
- Only 3 people per Partner Agency permitted inside of the CTFB dock/warehouse area.
- Smoking and chewing tobacco is prohibited.
- Food and drinks are prohibited.
- Electronic devices (cell phones) are prohibited.
- Only individuals 18 or older are permitted.
- Jumping on/off dock is prohibited. Use side ramp or stairs to get on dock.
- Partner Agencies operating warehouse equipment is prohibited.
- Acknowledge special notices posted in and around the warehouse.
- Notify the warehouse staff of any irregularities or potentially hazardous conditions (spills, etc.).
- Warehouse hours are subject to change at the discretion of the Food Bank.
- Closed-toe shoes required (no sandals or flip flops allowed).

SHOP-FOR

- The Shop-for area of the food bank includes free, fresh produce, dairy, and bread. Shop-for is limited to 30 minutes.
- Partner Agencies are able to utilize Shop-for at the Food Bank during regularly scheduled appointments, or may schedule additional appointments with the Network Services Team, as scheduling permits.
- Shop-for items must be boxed separately by category and weighed by Food Bank warehouse staff.
- For safety purposes, please only shop for items that are on the ground (single level). Only warehouse staff may move boxes from the cooler shelves to replenish the product that is below

REGIONAL DELIVERY

The Food Bank provides free delivery of food orders to Partner Agencies outside the greater Austin area through regional food delivery (RFD). The procedures for pickups at a regional food delivery are as follows:

- Each Partner Agency must arrive at the designated RFD drop site on or before the scheduled time and must be knowledgeable of their account name and number. The Food Bank driver is not obligated to wait for a late arrival. Late arrivals will be served last. If the driver has to bring the order back to the Food Bank, that agency will be charged a \$35 re-stocking fee.
- Children under the age of 12 are prohibited at a RFD site.
- Agency staff/volunteers should never enter the Food Bank truck. Only Food Bank staff are authorized to operate Food Bank equipment.
- It is the Partner Agency's responsibility to provide a vehicle large enough to accommodate the order. The Agency should provide enough help to load its order in a quick and timely manner. Agencies are encouraged to help each other.
- Trash should be put in containers and boxes and pallets neatly stacked.
- Partner Agencies receiving dairy and/or frozen items must bring coolers and/or insulated freezer blankets to transport these items. Agencies will not receive these items without the appropriate insulated containers or freezer blankets.
- Partner Agencies must check orders against the ordering invoice as the order is loaded into the vehicle. Any discrepancy must be brought to the attention of the Food Bank driver at the time of delivery or reported to CTFB within 24 hours of receiving your order in order to receive a product credit.
- Pick up procedures are subject to change by the Food Bank driver. Agencies will be notified in writing before new policies take effect.
- RFD Partner Agencies are permitted to schedule an order for pick up at the Food Bank warehouse on the weeks where no delivery service is available.
 - Example: If an agency receives an order in Marble Falls on the 1st and 3rd Tuesday of the month, the agency is able to schedule a pick up at the Food Bank on the 2nd and 4th week of the month.

Food Bank delivery drivers bring pallets of the product and unload them at a pre-determined location. Partner Agencies are responsible for breaking down the pallets and moving the product to the distribution area. The recipient Agency agrees to provide necessary training to their staff and volunteers for distribution and delivery of product.

HANDLING FEES & PAYMENTS

HANDLING FEES

Partner Agencies pay a handling fee to help defray miscellaneous operational costs (warehouse, freight, administrative expenses). This is not a charge for food. The fee is assessed on the gross weight of products received. The Food Bank can charge a maximum of 0.19 cents/pound. The Food Bank may reduce or eliminate this fee on certain products at its discretion. The Food Bank may pass on “value-added processing” (VAP) costs related to packaging or processing certain highly desirable products.

INVOICES

Partner Agencies will receive an electronic invoice each month if there is a balance due. All payments are due within 30 days of the invoice date or it will be considered past due. After 60 days, the unpaid invoice is considered delinquent. Partner Agencies may contact the Food Bank Accounts Receivable Specialist at 512-684-2103 to arrange for payments of past due invoices.

PAYMENT METHODS

Partner Agencies are encouraged to pay invoices online. Feeding America requires Partner Agencies to make product payments through an agency check or credit card. Payments are **NOT** accepted through personal checking accounts, personal credit cards, cash, or money orders. Partner Agencies may use agency credit cards from Visa, MasterCard, American Express and Discover. The Partner Agency account number and invoice number(s) must be included with payment, either by writing these numbers on the check or by enclosing a copy of the invoice. There is a \$25 charge for returned checks, which will not be re-deposited. The Partner Agency must maintain good credit with the Food Bank by keeping its handling fee payments current. All Partner Agencies are given a credit limit based on size and order frequency, so keep this limit in mind when ordering and making payments.

If you prefer to pay by mail, please address payments to:

Central Texas Food Bank
c/o Partner Agency Billing
6500 Metropolis Drive
Austin, TX 78744

Please note that credit card payments can take up to 3 business days to process and post to agency accounts. Payments through PayPal or made by check take 1-2 weeks to process and post to agency accounts. If you need to request an emergency credit balance adjustment, please call our agency hotline at (512) 684-2503.

RETURN POLICIES/CREDITS

Food products that carry a handling fee charged to the Partner Agency may be returned for credit if its conditions are unsafe for consumption or if it is damaged. Such condition includes excessive rust, dents or

infestation. Partner Agencies may also receive a credit if product is missing from an order. Shortages or damaged product on orders need to be reported to dock staff prior to leaving or to the Network Services Team no more than 24 hours after picking up the order.

- To report damages or missing product on your orders, please contact agencies@centraltexasfoodbank.org or 512-684-2503. If warranted, credit will be issued on the agency's next monthly statement

Recommendation: Photos are very helpful for making determinations about product credits. If product is damaged or unsafe for consumption, please take a photo to include in your request for credit.

PARTNER AGENCY FOOD SOURCING

In order to supplement their own inventory, Partner Agencies may choose to secure food items outside of ordering from CTFB, including through donations or by participating in CTFB's Agency Retail Pick-up program. For a comprehensive list of guidance related to the handling of this food see the 'Food Storage and Handling' (page 19) section of this manual.

AGENCY RETAIL PICK-UP

Agency Retail Pick-up (ARP) is one of the many ways the Food Bank is working to reduce food waste and ensure the families we serve have access to the fresh, healthy foods they need to thrive. This initiative saves time and resources by empowering partner agencies to pick up food donations directly from retailers near them. These pick-ups are coordinated with the food donor by CTFB Food Industry Team. Participation in ARP is considered a privilege, not a right, of partnership. All Partner Agencies who are ARP partners will be subject to additional monitoring, reporting, and policies & procedures for that program. Interested Partner Agencies may contact the Network Services department for more information.

PREPARED FOOD DONATION GUIDELINES

Prepared food donations should only be accepted from donors that adhere to all local and state food safety guidelines. Examples of prepared foods are items made at the donor site, such as fresh bagels, whole pizzas, and trays of catered food.

Acceptable Donations:

- Completely wrapped in approved food grade packaging.
- Proper labeling.
- Cooled quickly if previously held hot.
- At 41F or below. Fully frozen is preferred.

Unacceptable Donations:

- Previously served or put on a buffet table.
- Previously reheated items.
- Kept in the danger temperature zone for more than 2 hours.
- Not completely wrapped.
- Not in approved food grade packaging.
- Unlabeled / no ingredient statement or allergen disclaimer as required.
- Over 41F.
- Not cooled down to 41F if previously held hot.

Labels must contain the following components:

- The name and location of the Food Bank (6500 Metropolis Dr. Austin, TX 78744)
- The name and location of the donor.
- The food description.
- The date of donation.
- Allergen disclaimer statement or a list of ingredients. (Example of disclaimer: *Warning! This container holds rescued food. This food may contain, have come in contact with, or have been produced in a facility which also produces milk, eggs, peanuts, tree nuts, fish, shellfish, wheat, soybeans, and/or sesame seeds.*)

DONATED MEAT

Partner Agencies may not accept donated meat unless it has been processed at a state or federal certified meat processor (Ex: Hunters for the Hungry).

AGENCY OPERATIONS

All products (food or otherwise) donated to the Food Bank must be considered as having been donated under the provisions of Section 170(e)(3) of the U.S. Internal Revenue Code. The Food Bank requires Partner Agencies to follow IRS Code 170(e)(3) requirements at all times and mandates donated product is intended for the ill, needy or infants. Partner Agencies may only distribute donated products to clients, regardless of how they receive the donation (i.e. directly from Food Bank or retail pick-up program, etc.). Partner Agencies may not distribute donated products to non-Food Bank partner agencies. It is permissible, and encouraged in order to reduce waste, for one Partner Agencies to re-distribute excess product to other Food Bank Partner Agencies (see 'Sharing Food' below for specific guidance on this topic). In addition, Food Bank partners must follow these guidelines:

DISTRIBUTION REQUIREMENTS

- All Partner Agencies with an emergency food pantry must be open twice a month for a minimum of two hours each distribution. New Partner Agencies (as of 2016) must be open once a week with a minimum of two hours each distribution. Partner Agencies must serve a minimum of 25 households per month.
- Partner Agency hours of operation must be made public (sign on building, website, 211, etc.) and shared with CTFB.
- The following posters and notices must be displayed in an unobstructed location that is visible to clients:
 - “Justice for All” Civil Rights poster.
 - Central Texas Food Bank Guidelines for Perishable & Non-Perishable Food Items [poster](#).
 - TEFAP [Written Notice](#) of Beneficiary Rights (if your organization is affiliated with a religious organization).
- Food pantries are required to determine the eligibility of any client who wishes to receive food assistance (page 22).
- Partner Agencies may not solicit or accept donations from clients during a food distribution (i.e.: donation jar present during distribution).
- Partner Agency distributions that are open to the public may not exclude the participation of any protected class.
- Example: One day serves women but discriminates against men – sex is a protected class. One day serves seniors but discriminates against everyone under a certain age – age is a protected class
- Suggestion: Provide additional assistance on certain days for elderly, or make accommodations, such as providing seating, for clients if there are long lines that make it difficult for the elderly to stand

SERVICE ANIMALS

The Texas Health and Safety Code, Chapter 437, Section 437.023 requires a food establishment to allow people with disabilities to bring their service animal into all areas of the facility where customers are normally permitted. If a person’s disability is not readily apparent, for purposes of admittance to a public facility with a service animal, a staff member or manager of the facility may inquire about:

- 1) Whether the service animal is required because the person has a disability
- 2) What type of work or task the service animal is trained to perform.

U.S. Department of Justice’s regulation implementing Title III, 28 CFR Part 36, of the ADA section 36.302(c)(6) states “A public accommodation shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal.

The person with a disability cannot be asked to remove the service animal from the premises unless: the animal is out of control and the animal’s owner does not take effective action to control it; or the animal poses a direct threat to the health and safety of others.

PUBLIC NOTICE

Partner Agencies must give notice to the public of distribution of foods. Public notices must meet the following requirements:

- Target eligible households whose members are unemployed or have low incomes and households that include elderly or disabled people.
- Include the locations of sites.
- Provide the days and hours of distributions.
- If applicable, Partner Agencies should post a public notice to explain why a distribution is canceled.

TDA encourages Partner Agencies to inform the public of all USDA/TEFAP Food distributions through their own established and customary communication methods. Suggested methods to advertise the availability of USDA/TEFAP Foods include, but are not limited to, the following:

- The media (TV, radio, and newspaper)
- Civic and religious organizations
- City and county governments
- Social service organizations

Additionally, Partner Agencies must provide a public phone number with an up-to-date voicemail message that notifies the public about current distribution dates, times, and any other relevant information related to their food distribution when they call. This means no personal phone numbers or general organization numbers that are not monitored or prepared to assist people seeking food assistance are allowable for this purpose.

If Partner Agencies have any changes to the phone number for the public, or to distribution days and times, the Food Bank must be notified immediately so that we can provide accurate and up to date information to the community and those in need.

Partner Agencies may use an appointment system for distributions but may never refuse an eligible client who does not have an appointment. Agencies must include a process for serving walk-up clients, without an appointment, in their written procedures. Agencies must provide clear public notice explaining how to make an appointment, and the process must include multiple scheduling methods (such as online, in-person, telephone, etc.).

ALTERNATIVE DISTRIBUTIONS

Partner Agencies may offer alternative distributions in addition to their primary distribution. All alternative distributions must adhere to the general Partner Agency requirements to ensure compliance and must be approved by the Food Bank.

- Partner Agency should notify CTFB of any alternative distribution(s).

- Must adhere to safe and proper handling of product, which conforms to all local, state and Federal regulations and permitting requirements (this includes adhering to approved means to ensure temperature control is being practiced and monitored).
- Ensure that all client rights signage is posted and visible during all distributions.
- Partner Agencies must allow the food bank to monitor the alternative distribution.
- Alternative distribution service totals must be added to the monthly report.
- Partner Agencies participating in off-site backpack programs (not through Food Bank or Feeding America) may not use USDA TEFAP product in backpacks.
- Partner Agencies offering home delivery must have a written process in place that:
 - Explains the circumstances under which your organization will offer delivery, outlines how you will fulfill delivery, and how you will apply the process fairly and consistently to all participants.
 - Acknowledges that you will only deliver food directly to the client or the client's proxy. (For example, you cannot leave food on a doorstep if the client is not home).
 - Ensures the individuals fulfilling the deliveries have the same training required of pantry staff and volunteers, including Civil Rights training.
 - Ensures all clients complete the annual intake process.
- Partner Agencies collaborating with other organizations to serve shared clients must oversee all aspects of the intake process, food handling, distribution, storage, and reporting. Food may only be stored at the Partner Agency's site, and the Partner Agency must include all individuals and households served in their monthly reporting. All individuals interacting with clients must be trained by the Partner Agency and must complete Civil Rights training. All clients must complete the annual intake process.
- Partner Agencies distributing food in a different county from where the organization is physically located must notify the Network Services team in order to establish a plan for accurate monthly reporting. CTFB and Feeding America analyze food insecurity data based on county, so attributing distributions to the correct county is essential.

SHARING FOOD

The Food Bank may permit Partner Agencies to distribute donated product obtained from, or enabled by, the Food Bank to other approved agencies if the following conditions are met:

- The product being sub-distributed is in excess to the normal distribution, needs to be distributed to maintain quality, or be distributed while it is safe for human consumption.
- Product can only be sub-distributed to other Food Bank approved Partner Agencies.
- Product may only be re-distributed one time.
- All sub-distributions must be tracked accurately by partner agencies to facilitate trace and recall procedures.
- No fees can be charged in relation to sub-distributions (e.g. VAP, handling fees, delivery, transfer, referral or any other fees paid to the sub-distributing organization).

- USDA TEFAP product can never be shared.

BARTERING OR SELLING

Bartering or selling of donated products is strictly prohibited under Section 170(e)(3) of the Internal Revenue Code.

OPERATIONAL IN-HOUSE USE OF NON-FOOD PRODUCTS

The Partner Agency may use non-food items (such as toilet paper, soap, or cleaning supplies) in moderation for its operations, as long as those operations relate to the charitable mission of the Partner Agency (not entire organization or church). Orders are screened by the Food Bank for signs of abuse.

Specific in-house regulations:

- Snack or beverage items obtained from the Food Bank may be served to volunteers in moderation during meetings or trainings at the partner's facility. Donated product may not be ordered specifically for staff and volunteer usage.
- Donated product may not be used during a meeting when fundraising is being conducted.
- Donated product may not be used for the purpose of fundraising either as prepared food (ex: spaghetti dinners, bake sale) or as "prizes."
- Volunteers may not be rewarded with donated product.
- Partner Agencies may permit staff/volunteers to consume donated product (in moderation) for the following reasons:
 - To become more familiar with the product (to be in a better position to advise clients about uses, nutrition education).
 - To test the product for safe consumption (ex: Product nearing or passed code date).

VOLUNTEER USE OF DONATED PRODUCT

Partner Agencies must use extreme caution to not give the perception that volunteerism is rewarded or compensated with donated product. This would appear that you are paying for volunteers with donated product which is a direct IRS violation. The Food Bank understands that some clients volunteer and some volunteers may find themselves as clients, so partners should implement internal volunteer procedures that address these situations. Best practice: If a volunteer is food insecure, receiving food assistance should be priority over volunteering. If the only available volunteers are clients, Partner Agencies must ensure the following:

- The client/volunteer receives the same items and amount as all other clients
- The client/volunteer may not receive any preferential treatment
- The client/volunteer may not "cherry pick" product
- The client/volunteer is recorded as receiving assistance
- The client/volunteer receives food assistance after all other clients

MEALS FOR VOLUNTEERS AND STAFF

Site volunteers and staff (referred to here as volunteers) may eat at the site if doing so still allows distribution to all participants. For example, closing a site for volunteers to eat a meal limits distribution to participants. Volunteers' meals may be claimed as an allowable cost as long as the costs meet the following criteria.

- Reasonable: Reflecting the cost of an average lunch
- Adequately documented: The site must maintain records with the following information:
 - 1) Each volunteer's name
 - 2) Hours each volunteer worked
 - 3) Receipts, invoices, or other documents showing the cost of feeding volunteers
 - 4) Each volunteer's signature for each meal

FOOD STORAGE & HANDLING

All Food Bank food storage and handling regulations must be followed to ensure client safety. It is imperative that Partner Agencies take the appropriate steps to ensure product quality and know the procedures for accepting donations from sources other than the Food Bank. Partner Agencies should have cold storage (cooler and freezer) on site for perishable product, a secure food storage space, and should not be located in private residences. Shelf-stable product must be stored at temperatures recommended by state and local health codes.

FACILITY EVALUATION

- Outside is free of debris/contaminants.
- There should be no holes or gaps in the pipe conduits, screens, floor, ceiling, or doors to allow insects or rodents access to the food.
- Food must be prepared, stored, and distributed in a Food Bank approved facility. Food Bank food may never be stored or distributed at an alternate location temporarily without prior notice and approval.

DRY STORAGE AREA

- The food storage area should be locked when not supervised to prevent possible theft.
- Food items must be stored at least six inches from the floor and walls and two feet from the ceiling.
- Maintain a clean and dry storage area that is well ventilated and climate controlled. The shelves should remain clean with no debris on the floor.
- Garbage cans must be covered and emptied frequently to prevent unwanted pests.
- Cleaning or toxic supplies must be stored lower than food items or in a separate storage area. Paper goods, diapers and feminine hygiene products should also be isolated from chemicals.

- Any agency that repackages food must comply with applicable rules regarding prepared food within the county and city of the pantry. This includes the requirement for a current health department inspection and Food Manager's Certificate.
- *Please note: under no circumstances will USDA TEFAP commodities be permitted to be repackaged.* The repackaging of flour and sugar is strongly discouraged due to the possibility of cross contamination.
- The Partner Agency must take adequate steps to ensure that food items obtained from sources other than the Food Bank have adequate labeling and are free of serious defects that may pose a health hazard to the Partner Agency's clients.
- No severely dented/rusted cans.
- Personal or volunteer food should be kept in a separate area to avoid confusion.
- Baby food must be discarded after the expiration date.
- The Partner Agency should rotate, label or take periodic inventory of the food items to ensure freshness. Remember, FIFO (First In First Out).
- Food items meet local & federal health standards.

REFRIGERATOR/FREEZER AREAS

- Refrigerators and freezers should either be in a locked area, or they must be lockable.
- Units clean and odor free.
- Items stored in walk-in unit 6 inches from floor and walls, and two feet from the ceiling.
- There must be a thermometer in all cold storage units. Refrigerators must be kept at 40 degrees F or below, while freezers at 0 degrees F or below (Exception: Temperatures may vary for designated produce-specific cold storage).
- No sources of contamination.
- Each year, USDA TEFAP flour, grain, and pasta products must be refrigerated during the months of May through September.
- Personal or volunteer food should be kept in a separate area to avoid confusion.
- Food must be clearly labeled with the item name, ingredients, date, and/or a food allergen statement.
- The Partner Agency must take adequate steps to ensure that food items obtained from sources other than the Food Bank have adequate labeling and are free of serious defects that may pose a health hazard to the Partner Agency's clients. All protein products must be frozen before the sell by date. Only properly refrigerated or frozen items may be accepted.
- The Partner Agency should rotate, label or take periodic inventory of the food items to ensure freshness. Remember, FIFO (First In First Out).
- Food items meet local & federal health standards.
- Food items obtained from another source must maintain the same health standards as product obtained from the Food Bank.

PERISHABLE FOODS

Perishable foods are defined as any food that requires refrigeration or that is frozen. If a Partner Agency wishes to receive perishable foods from the Food Bank, the Partner Agency must meet the following criteria:

- The Partner Agency must have an adequate number of appropriately insulated containers to transport refrigerated or frozen products from the Food Bank or regional distribution site.
- Refrigerated products must be stored at 40°F or below and 0°F or below for frozen products.
- Thawed perishables must be cooked or eaten immediately after thawing and never refrozen unless cooked first.
- Eggs should be stored on the bottom shelf in the refrigerator to avoid cross contamination in case of breakage.

PREPARED FOODS

Partner Agencies must meet the following criteria when preparing and distributing food products:

- Onsite kitchens must meet all state and local health department regulations and hold all applicable licenses. The Partner Agency must provide an up-to-date copy of the most recent health inspection report to the Food Bank. The Partner Agency must immediately notify the Food Bank of any changes in its status.
- There must be a designated hand washing sink for all staff and volunteers handling food. This sink cannot be a food preparation sink and must be clearly labeled with a sign instructing staff and volunteers to wash their hands.
- Prepared foods must be cooked, reheated and held for serving at safe temperatures: 160° F or higher for cooking, 140° F for holding, and 165° F when re-heating. A probing thermometer should be used to accurately monitor the temperature of the food.
- All frozen foods must be thawed in the refrigerator at temperatures between 35 and 40° F and cannot be re-frozen unless cooked at the appropriate temperatures. Food should be placed in a pan to catch drips while thawing.
- Repackaged or opened food must be stored in rodent and insect proof containers. All non-produce food must be labeled with the name of the item and the date the package was opened or prepared.
- Any agency that repackages food must comply with applicable rules regarding prepared food within the county and city of the pantry. This includes the requirement for a current health department inspection and Food Manager Certificate. Please note: under no circumstances will USDA TEFAP be permitted to be repackaged. The repackaging of flour and sugar is strongly discouraged due to the possibility of cross contamination.

CLIENT ELIGIBILITY & APPLICATION

At the time of the initial application and when reapplying for USDA TEFAP foods annually, clients must agree to provide the following federally required information to determine eligibility: (a) name (b) address (c) number of persons in household (d) the basis for eligibility. A household may be eligible based on annual household income, enrollment in other federal benefits, or household crisis. Partner Agencies may not impose their own eligibility criteria. Partner Agencies must use the Pantry Intake Form or other CTFB-approved intake form in order to qualify all clients for food assistance. Partners using Oasis Insight will complete the Intake Form electronically within the database.

All information may be self-declared. Partner Agencies may request but **must not require** proof of application information, including, but not limited to, the following:

- Identification
- Address
- Income

As of June 2022, clients are no longer required to provide a signature on the intake form. Intake staff/volunteers are required to sign the form in order to certify the eligibility period.

Partner Agencies must clarify the following points to applicants and participants:

- 1) The inability or unwillingness to provide proof of ID, Residency, or Income is **not** a barrier to participation.
- 2) Participants will receive USDA Foods without proof of ID, Residency, or Income.

Clients (households) must agree to cooperate (to the extent the household is capable) to clarify or provide information needed to establish eligibility. Clients must repay the value of USDA TEFAP foods received if an error in eligibility is found because of erroneous information provided by the household. Clients must not sell or exchange USDA TEFAP food and must report changes in circumstances, such as income or household size. A Household is defined as an individual or group of related or non-related individuals (excluding boarders and residents of institutions) who live together as a single economic unit and customarily purchase and prepare food in common.

Partner Agencies may collect additional data (such as employment status) for other services – for example, clothing aid or assistance with bills. The federally required information to determine USDA TEFAP eligibility must be collected **before** the Partner Agency requests additional data. **The collection of additional data must not be a real or perceived barrier to participation in USDA TEFAP.**

Partner Agencies may not impose their own eligibility criteria for food assistance. Agencies may target specific populations (for example, veterans/active military families), but must not deny access to any client who requests food assistance and who is otherwise eligible based on the standard TEFAP criteria. Agencies who target special populations must include this information in their public notice, and must have a procedure in place to serve and provide appropriate referrals to all clients seeking food assistance.

Partner Agencies must protect the confidentiality of any information that has been provided on an application for eligibility, whether the application is paper or electronic. The intake and recertification processes must be conducted in an environment that would ensure confidentiality. Clients completing their own forms should be allowed a physical space in which others will not see their information. Intake workers completing intake on a client's behalf should do so in a separate area where they will not be overheard.

CITIZENSHIP

There are no citizenship requirements. Partner Agencies must not request nor require any applicant or participant to prove citizenship through any means whatsoever.

RESIDENCY

Applicants must reside within the Central Texas Food Bank's 21-county service area. If a client does not live in your agency's service area, the client must be referred to a different site in their service area. The Food Bank suggests providing emergency food assistance to individuals before referring them elsewhere.

CATEGORICAL ELIGIBILITY (ENROLLMENT IN BENEFITS)

A household is automatically (or categorically) eligible for USDA Foods if it currently receives assistance from one of the following programs:

- Supplemental Nutrition Assistance Program (SNAP), formerly Food Stamps
- Temporary Assistance for Needy Families (TANF)
- Supplemental Security Income (SSI)
- National School Lunch Program (NSLP) free or reduced-price meals
- Non-institutional Medicaid

INCOME ELIGIBILITY

A household is eligible based on income if they have an annual household income at or below 185% of federal poverty guidelines. USDA annually publishes the TEFAP Income Eligibility Guidelines, which contains household qualifying income cut-offs for annual, monthly, and weekly income levels per number of household members. The eligibility guidelines cover the period from July 1 through June 30 of the following year. Current income guidelines and intake forms must be utilized by Partner Agencies by July 1 of each year.

HOUSEHOLD CRISIS ELIGIBILITY

Clients who are not eligible based on income or enrollment in government benefits are asked to indicate that they are in an emergency need for food on the intake form. If the client indicates that they are in emergency need, they eligible to receive USDA TEFAP food for up to 6 months. This time frame can be decided by the intake counselor but cannot exceed 6 months per emergency case without TDA approval. If the client does

not wish to indicate that they are in an emergency, the client cannot receive USDA TEFAP food. Partner Agencies should use recent invoices to decipher what food product is USDA TEFAP product. In general, ALL clients should receive USDA TEFAP food unless they do not wish to declare they are in emergency need for food.

Characteristics of a Household Crisis	Unexpected Costs of a Household Crisis
1. Unexpected	1. Necessary medical treatment of a household member
2. Temporary	2. Burial expenses of a household member
3. Beyond the household's control	3. Uncontrolled loss of employment
	4. The repair or replacement, because of a household disaster ¹ , of the household's <ul style="list-style-type: none">• home,• home contents, or• vehicle

To continue receiving USDA/TEFAP Foods after a certification period has ended, the household must be recertified by reapplying and meeting eligibility requirements again. A certification period begins the first month the household receives the USDA Foods, and may not exceed 12 months. All staff/volunteers must indicate the client's certification period on all intake forms and sign the certifier section. The certification period for categorical and income eligibility is 12 months, while the certification period for crisis eligibility is 6 months.

THE PROXY

A proxy is a person designated by a participant to act for the participant as necessary throughout every process of TEFAP. For example, proxies can provide a signature on forms. Proxies may also act for the participant at application, certification, food distribution, and recertification. A proxy must provide proof of identification prior to picking up a food package.

A client may designate a proxy by listing the proxy's name on the annual Pantry Intake Form, or by providing a written statement that contains at the least the following:

- 1) Participant's name
- 2) Name of distribution site
- 3) Authorization, including proxy's name
- 4) Duration of proxy

The Partner Agency must maintain each written proxy designation on file. Proxy identification must be reviewed at each application, certification, food package distribution, and recertification. A client may designate more than one person as his or her proxy if necessary. In addition, multiple clients may designate the same person as their proxy. If a Partner Agency wishes to limit the number of clients for whom a single proxy can pick up at each distribution, this must be clearly outlined in the Agency's written procedures.

There are two ways to change a proxy:

- 1) In a written statement.
- 2) In person at the CE or site, where proxy changes are noted and maintained in the participant file (for example, on the Pantry Intake Form or within the Oasis Insight database).

Recommendation: Partner Agencies should provide clients with a proxy document for their records and to use at other distributions if necessary. This document can be a proxy card or a copy of their proxy form. Please contact your CTFB Relationship Manager for more guidance on how to operate a proxy system.

The above eligibility and application policies apply to all Central Texas Food Bank Food Pantry partners, regardless if they distribute USDA TEFAP product or not. Please note: Onsite Kitchen partners are not required to complete an intake form with clients receiving prepared congregate meals.

WRITTEN PROCEDURE

Partner Agencies must maintain written procedures for the application process, referral process, and for reporting fraud, negligence, and misuse of foods. The procedures must be available for monitor and compliance reviews at all levels of distribution. The Central Texas Food Bank has provided this [procedure](#) for all partners, but we suggest making your own to fully encompass your organization's unique operations and to be best prepared for transition in the event of staff or volunteer turnover in the future. CTFB has provided a [checklist](#) to assist Agencies in documenting written procedures. In addition, Feeding America has provided useful [resources](#) to assist your agency with transition planning.

CIVIL RIGHTS

Partner Agency staff and volunteers must not engage in discrimination against any person on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age or reprisal or retaliation for prior civil rights activity.

SITES LOCATED AT RELIGIOUS ORGANIZATIONS

Federal civil rights laws address explicitly religious activities at religious organization sites:

- 1) Organizations must not engage in explicitly religious activities, including overt religious content such as worship, religious instruction, or proselytization.
- 2) An explicitly religious activity at a site must be separated in time or location from food distribution services.
- 3) Organizations must not require participants or applicants to participate in explicitly religious activities to receive food assistance.

The following table provides examples to guide explicitly religious activities at sites.

It is acceptable to...	It is unacceptable to...
Have a cross hanging on a wall at the food distribution facility.	Require clients or volunteers to stand by the cross and recite a prayer prior to receiving food assistance.
Have a menorah on a table at the distribution facility during the holiday season.	Refuse food assistance to clients who do not practice the Jewish faith.
Have a display stand at the front/back of the distribution facility that contains faith-based pamphlets for anyone interested.	Insert faith-based pamphlets in bags or boxes without asking for clients' permission.
Have a pastor or other religious official assist with the food distribution.	Require or encourage clients to have a religious conversation with the pastor or official prior to receiving food assistance.
Have a prayer service on the second level of a church or in a separate building while the distribution of food is happening on the lower level or different building.	Have a prayer service in the same room or area and at the same time the distribution is taking place.
Invite clients to participate in a voluntary prayer before, and clearly separate from, a food distribution.	Lead clients and/or volunteers in prayer at the beginning of a distribution.

WRITTEN NOTICE OF BENEFICIARY RIGHTS

Sites located at faith-based or religious organizations must protect applicants' and participants' rights regarding participation in religious activities. Sites must display the TEFAP Written [Notice](#) of Beneficiary Rights near the "And Justice for All" poster to inform participants of the following information:

- The site must not discriminate against participants on the basis of religion or religious belief; a refusal to hold a religious belief; or a refusal to attend or participate in a religious practice.
- The site must not require participants to attend or participate in any explicitly religious activities. Participants' participation in these activities must be purely voluntary.
- The site must separate, in time or in location, any privately funded, explicitly religious activities from activities supported with USDA direct assistance.

- If the participant objects to the religious character of the site, then the site must make reasonable efforts to make a referral to an alternative provider to which the participant has no objection, with the understanding that the site cannot guarantee that an alternate provider will be available in every instance.
- Applicants and participants may report violations of these protections (including denials of services or benefits) to TDA at www.Squaremeals.org.

Upon the request of a participant, Partner Agencies must provide a copy of the written notice.

BENEFICIARY REFERRAL REQUEST

When an applicant or participant objects to the religious character of a site, the site must make reasonable efforts to refer them to an alternative site. “Reasonable efforts” depend on the situation. At a minimum, the Partner Agency must 1) attempt to identify an alternative provider and 2) determine the service that the provider offers. A referral may be made to non-USDA funded providers if necessary and if the provider has the capacity to accept the beneficiary.

The TEFAP and CSFP Beneficiary Referral [Request form](#) documents the referral efforts. Copies of the form must be available at each site. The Partner Agency must keep the Referral Request onsite for 3 years and make records available to TDA and CTFB upon request.

DISABILITY ACCOMMODATIONS

The Food Bank requires all Partner Agencies to provide reasonable accommodations to clients with disabilities during food distributions. If distribution locations are inaccessible for individuals with disabilities, all services must still be provided (deliver to car, etc.)

CIVIL RIGHTS “JUSTICE FOR ALL” POSTER

The Food Bank requires all Partner Agencies to post the provided “Justice for All” poster in an unobstructed location visible to clients. All older versions of this poster must be removed. The current poster is green. If your organization does not have a “Justice for All” poster the Food Bank will provide one at no cost to your agency. The Justice for All poster contains the nondiscrimination statement, advises clients of their civil rights while receiving food assistance, and contains instructions for how to file a Civil Rights complaint.

CIVIL RIGHTS AND PROGRAMMATIC COMPLAINTS

CTFB recognizes the difference between a program complaint and a civil right one. Civil rights complaints can be filed directly with the Texas Dept. of Agriculture, USDA or with CTFB. Program complaints are filed directly with CTFB. CTFB respects the confidentiality of all its PAs, clients, and PA clients. To provide an environment in which all feel safe registering a grievance, complainant information is never shared.

Grievances against Partner Agencies: The Agency is required to provide a CTFB Agency Grievance Form to any client who requests it. This process also applies to applicants, program participants, agency staff and volunteers. If the complaint prefers to remain anonymous, this form can be turned in to CTFB by the client.

The procedure for investigating the grievance against the Agency is as follows:

- CTFB must respond to and investigate the client grievance.
- CTFB will notify the Agency, by telephone or visit, of the specific complaint that was received, if deemed appropriate and only for minor issues reported.
- Multiple complaints may result in an unannounced site visit by CTFB to ensure the Agency is operating in accordance with all CTFB guidelines.
- The conclusion of the investigation is at CTFB's sole discretion, and any recommendations will be documented in the Agency's file. The Agency will be notified in writing of the conclusions and any actions taken.

Retaliation: CTFB has a zero-tolerance policy against retaliation of any kind. A client will not be discriminated against, harassed, or suffer any reprisals because of filing a grievance. Agencies are offered the same privilege of voicing their opinion without retaliation by CTFB. An Agency will not harass or defame any CTFB employee who has conducted a site visit and recommended a plan of corrections. If there is an indication that anyone (agency, client, or CTFB staff) has engaged in activities that may be construed as retaliation, CTFB will investigate the claim and take appropriate action.

Agencies must have written procedures for addressing and processing complaints. A Civil Rights complaint involves any alleged discrimination on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age or reprisal/retaliation for prior civil rights activity. Clients must be informed of their right to file a civil rights complaint directly with the USDA, following the methods listed on the "Justice For All" poster. Agencies must immediately notify CTFB of any Civil Rights complaints.

A programmatic complaint is a complaint about your Agency that does not involve alleged discrimination on the basis of a protected class. Clients should be provided with contact information for CTFB should they wish to discuss any civil rights or programmatic complaints with Food Bank staff.

Service of Clients: All clients must be served fairly and equitably and at the times posted. If the determination is to serve clients "once per week" then all clients must be served once per week. Clients should be informed of distribution frequency and when a distribution is cancelled for any reason, with at least three days in advance, when possible. Agencies must post a Client Bill of Rights and Agency Bill of Rights in a clearly visible area so clients are aware of their rights.

TEFAP PARTICIPANT RIGHTS AND RESPONSIBILITIES FORM

TEFAP applicants and participants have rights and responsibilities that are listed in the TEFAP Participant Rights and Responsibilities form. Partner Agencies must make the form available during the application and

recertification process. Partner Agencies may read the form to applicants if necessary, or applicants may read it themselves. Partner Agency must provide a copy if requested by the applicant.

Recommendation: Present a laminated copy of the TEFAP Participant Rights and Responsibilities form to each applicant and instruct them to read as part of the application process. Post the form near the intake area and instruct the applicant to review.

USDA NONDISCRIMINATION STATEMENT

This statement is included on the “Justice For All” poster and on the CTFB intake form. If your agency uses a unique intake form, this statement must be printed on the form. The nondiscrimination statement must be printed in its entirety on all public TEFAP documents. If the material is too small to permit the full statement, the following statement must be included at a minimum: “This institution is an equal opportunity provider.” The statement should also be included on your website and social media.

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

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

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

- 1) **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
- 2) **fax:**
(833) 256-1665 or (202) 690-7442; or

- 3) **email:**
Program.Intake@usda.gov
- 4) This institution is an equal opportunity provider.”

GRIEVANCES

GRIEVANCES AGAINST PARTNER AGENCIES

- The Food Bank Network Services Department must respond to all public Partner Agency complaints.
- Network Services may notify the Partner Agency and/or board of directors about the complaint, and if action is required, will initiate investigation protocols.
- Network Services reserves the right to visit any Partner Agency unannounced to investigate complaints made by the public.
- Investigation results will be documented in the Partner Agency’s file, and the Partner Agency will be notified in writing if any action needs to be taken.

GRIEVANCES AGAINST THE FOOD BANK

- Partner Agencies may submit a written grievance statement to the Director of Network Services. The statement must include the reasons for the grievance, pertinent facts, and what the Partner Agency believes would be an acceptable solution to the problem.
- The Director of Network Services will develop a plan of action in writing within seven working days of receiving the grievance notice.
- The Partner Agency may appeal this decision to the Food Bank CEO within ten working days. The decision on appeal will be given to the Partner Agency in writing within seven working days of receiving the appeal. The Food Bank CEO’s decision is final.
- A Partner Agency will not be discriminated against or suffer any reprisals by the Food Bank as a result of filing a grievance

Losses and Damages: The Agency will report loss/damage of commodities to Central Texas Food Bank, as Central Texas Food Bank is responsible for filing all loss claims with the USDA regardless of whether the loss occurred at its facility or at the Agency’s facility. If the Agency: A. Improperly distributes or uses any TEFAP commodities; B. Causes the loss of or damage to TEFAP commodities through its failure to provide proper storage, care, and handling, including poor or lack of pest control; and/or C. Experiences a loss of TEFAP commodities due to excessive inventory, as determined by Central Texas Food Bank. CTFB will pursue a claim (payable by the Agency) for the value of the lost TEFAP commodities.

PARTNER AGENCY TRAINING REQUIREMENTS

Partner Agencies are responsible for documenting their training records and maintaining certificates of completion on file, which will be requested by the Food Bank during annual inspections. If Partner Agencies conduct their own trainings, they should maintain records containing the date and location of the training, training topics and trainer name, and signatures of attendees.

FOOD SAFETY TRAINING

Feeding America and USDA require all Partner Agencies to be trained in Food Safety. A member of your agency staff must either be a certified food manager (onsite partners-OS/OP) or certified food-handler (pantries-PA) from an accredited school or the local health department while adhering to all local and state food safety guidelines.

CIVIL RIGHTS TRAINING

Feeding America and USDA require all Partner Agencies to be trained in Civil Rights. All staff and volunteers who ever handle clients' personal information or who regularly interact with program participants must receive an annual Civil Rights training, which is offered for free [online](#) through the Texas Department of Agriculture.

All other volunteers must review the limited Civil Rights [training document](#) each time they volunteer. We recommend creating a sign-in sheet for volunteers to sign and date for verification.

OASIS INSIGHT USER CONFIDENTIALITY

In order to protect client data, all Oasis Insight users must be trained on Client Confidentiality. It is the responsibility of each Partner Agency's Oasis Administrator to ensure that all users complete the CTFB provided [User Confidentiality training](#). In addition, the Partner Agency must ensure that each Oasis User signs a User Confidentiality Form.

PARTNER AGENCY RECORD KEEPING

Partner Agencies are required to keep the following [records](#) onsite and make them available to the Food Bank, Feeding America, USDA, and TDA staff when requested:

NON PROFIT 501(C)(3) STATUS

All Partner Agencies receiving donated products from the Food Bank must be federally exempt 501(c)(3) organizations, be affiliated with a 501(c)(3), or be a 501(c)(3) equivalent (churches). See IRS Publication 557

for an explanation of the different 501(c) statuses. The agency must adhere to all requirements under IRS Code 170(e)(3). All Partner Agencies must show clear, complete, and current documentation of their agency's exemption under Section 501(c)(3) exemption of the Code or Church status. The following are examples of complete information:

- Current IRS determination letter where the address matches the address of the organization listed on the Partner Agency agreement, or
- Current group exemption letter with a listing of the local agency in the group exemption directory, a list of active local sites from the national/regional headquarters website, or a letter from the group exemption's headquarters or regional office attesting that the local organization is covered under their group exemption, or
- Current listing of the organization on IRS website section under Exempt Organizations Selection Check (Publication 78 data) indicating they are a Public Charity ("PC"); or
- Faith Based Organization Eligibility Form that includes documentation of the organization's ability to meet at least nine (9) of the fourteen (14) possible criteria established by the IRS to be considered a Church (i.e. "14-point criteria"); or
- A letter from the CEO or Board Chair of a qualified agency indicating that it is the Agency sponsoring such program and assuming all responsibilities (fiscal and legal) for the sponsored organization. The Member will need both the sponsorship letter as well as clear, complete and current evidence of the sponsoring organization's exemption or Church status following criteria listed above.

EXTERNAL FINANCIAL AUDIT

Any Partner Agency that receives greater than 275,000 pounds during the last fiscal year must obtain an external financial audit and submit at least the opinion page to CTFB. If your agency is unable to provide evidence of an external financial audit, you must submit evidence that the agency has practices in place to ensure the sound financial management of government funds. The Network Services team can provide details regarding acceptable documentation, as needed. Because USDA TEFAP and FEMA programs are federally funded, the Food Bank is required to comply with the Single Audit Act of 1984, 31 U.S.C., Section 7501 et seq., and OMB Circular No. 133 "Audits of Institutions of Higher Education and other Nonprofit Institutions."

BOARD OF DIRECTORS

All Partner Agencies must have a current list of directors, board members, or the equivalent. This list must contain current contact information for those listed.

AGENCY AGREEMENTS

The TEFAP Agreement binds both the contracting entity (Food Bank) and site (Partner Agency) to the terms and conditions required for distributing USDA/TEFAP foods.

The Partner Agency Agreement serves as an annual confirmation that the Partner Agency adheres to all guidelines set in the Partner Agency Policies & Procedures manual and follows the basic qualifications for being a Partner Agency.

Additional agreements may include a Service Insights/Data Sharing Agreement and other CTFB Program specific agreements, as applicable.

HEALTH DEPARTMENT INSPECTION & FOOD MANAGER CERTIFICATE

If the Partner Agency is a meal provider (Onsite Kitchen - OS/OP) or repackages food, a member of the agency must hold a certified Food Manager certificate and either a city, county, or state Health Department inspection. A current copy must be provided to Food Bank for the agency's files. A health inspection is required regardless if the agency's staff or clients prepare the meals. The Food Bank requires a health inspection at all onsite feeding programs regardless of particular county regulations.

Partner Agencies are responsible for being knowledgeable of and following all health department inspection and permitting requirements within their local jurisdiction. Partner Agencies in the City of Austin must be registered or permitted with [Austin Public Health](#) on an annual basis, in line with Austin City Code requirements for [Charitable Feeding Organizations](#).

ORDER INVOICES

All Partner Agency invoices must be kept onsite for 3 years. These records should be made available during monitor visits and audits. All invoices are required to be reviewed for accuracy and signed by the Partner Agency at the time of order pick-up.

PEST CONTROL RECORDS

Food storage areas are particularly susceptible to rodent and insect infestation. A visual inspection of the Partner Agency's facilities should be done at least monthly, with prevention and treatment recommended quarterly or as needed.

- If the Partner Agency uses a professional pest control company, copies of service reports should be made available to the Food Bank representative during monitoring and records must be kept on-site for one year.
- If the Partner Agency performs self-pest control, copies of product and chemicals used should be made available to the Food Bank representative during monitoring and records must be kept on-site for one year.
- The exterior perimeter of the storage location must be kept free of tall grass, untended shrubbery, or debris to reduce the possibility of harboring pests.
- The Food Bank reserves the right to require an agency to use a professional pest control service if deemed necessary during a monitoring visit.

TEMPERATURE LOGS

All cold storage units are required to have a thermometer that is readily accessible (Cold storage units with exterior digital thermometers must also have a physical internal thermometer present). Refrigerator temperatures should be held at 40 degrees F or below, and freezer temperatures should be held at 0 degrees F or below. Three years of temperature logs should be made available to the Food Bank representative during monitoring visits. Cooler and freezer temperatures must be checked and recorded during regular business hours, and during shut-down or vacation periods:

- a minimum of every other day,
- immediately after a power loss is known or suspected,
- late each Friday afternoon and early each Monday morning (if operations are suspended during weekends).

INTAKE FORMS & SIGN-IN SHEETS

Intake forms and sign-in sheets must be kept on-site for 3 years. Electronic data tracking systems (ex: Oasis Insight) may also be used to maintain records. All hard copy intake forms containing client signatures must be kept on file for 3 years. Paper intake forms collected after the client signature requirement was waived in June 2022 may be shredded only if:

- 1) All information is entered into an electronic data system.
- 2) The data system produces an electronic copy of the intake form that contains all of the federally required TEFAP elements (for example, the Nondiscrimination statement and certification statement).

Please connect with the Network Services team before shredding any paper forms in order to review your process for compliance.

All client information must be stored securely in order to protect clients' confidentiality and privacy. Paper records must be stored in a locked cabinet with limited access. All electronic records must be protected with appropriate administrative, technical, and physical safeguards that provide a reasonable level and scope of security. All agencies handling electronic client data will adhere to the standards and requirements established by the Service Insights and Client Data Sharing Agreements.

MONTHLY REPORTING

MONTHLY REPORTS

All Partner Agencies are required to [submit monthly reports](#) in order to remain in good standing. Monthly reports share important service impact data and help the Food Bank plan ahead for the food sourcing needs of

the network. In turn, the Food Bank provides cumulative information to the Texas Department of Agriculture, which reports consolidated statewide numbers to the United States Department of Agriculture, and Feeding America. Partner Agencies may not anticipate the number of clients that will be served. Reports submitted ahead of schedule will not be accepted. Partner Agencies that did not serve food must still report zero totals in the monthly report. Depending on the type of program, either the total number of meals or the number of households and individuals served must be provided, as follows:

- **Onsite Kitchens (OS):** On-site feeding programs (soup kitchens, residential programs, shelters, snack-only programs, etc.) must report the total number of individual meals and snacks that are served each month. If accurate numbers of meals served are recorded each day, the total of the month's numbers should be reported. Otherwise, the number of meals served may be calculated as follows:
 - Count the number of times meal service was offered during the month.
 - Multiply that by the average number of clients participating in each meal. For example, a residential home may serve breakfast and dinner on weekdays, and breakfast, lunch and dinner on Saturdays and Sundays. In a sample month, there are 22 weekdays and 4 full weekends, or 44 weekday meals (22 days x 2 meals) and 24 weekend meals (4 Saturdays and 4 Sundays x 3 meals each day), totaling 68 times during the month that meals were served.
 - Finally, multiply that number by the average number of clients served at each meal. If an average of 11 clients is served at the Partner Agency, a total of 748 individual meals were served (68 x 11) and should be reported. Note: Snack service is considered a meal.
- **Food Pantries (PA):** Food pantries must report the total number of households that receive food each month. If a single person is served, they are considered to be a household. If a family is provided groceries more than once during the month, each visit should be counted separately. You should also include the number of individuals in the household served.
 - Minimum Requirement of 25 families per month: If a Partner Agency reports less than the required minimum of 25 families per month, the Partner Agency is subject to a 3 month probation period. During this time, the Partner Agency will work with Food Bank staff to meet the minimum requirement. If the Partner Agency cannot meet the minimum after the probation period, the Food Bank reserves the right to take action in form of suspension or termination of partnership.
- **Onsite Kitchens/Food Pantries (OP):** Partner Agencies that are both an onsite feeding program and a food pantry are required to report both the number of meals and the number of households and individuals served.
 - Partner Agencies that participate in feeding programs such as HOPE or Fresh Food for Families will have separate program numbers and therefore should report meals or clients served by each program separately.

MONTHLY REPORT DUE DATES

The Partner Agency Monthly Report is due on the 8th of each month. Agencies have until the end of the day

(11:59 p.m.) on the 8th to submit their report. For example, December's report is due on January 8th. Agencies that submit their monthly reports after the 8th will receive a reporting hold on their account.

The Partner Agency Monthly Report must be submitted through the online reporting form. Reports in any other form, such as emails or phone calls, will not be accepted. Contact agencies@centraltexasfoodbank.org or call the AR Hotline (512) 684-2503 if you have questions related to agency reporting.

HOLDS, SUSPENSION, TERMINATION, & APPEAL PROCESSES

If Partner Agencies violate Food Bank policies and procedures, there are three possible actions: Account Hold, Suspension, or Termination.

HOLDS

Partner Agency accounts may be placed on a “Hold” status for the following reasons:

- **Credit Hold** – Agency has exceeded the credit limit and/or has not paid bill.
- **Document Hold** – Agency has been prompted to submit documentation (Training certificates, board of directors list, 501(c)(3) / IRS documents, etc.) and is not responding to or communicating with the Network Services team in a timely manner.
- **Monitor Hold** – Agency is due for annual monitor and is not responding to or communicating with the Network Services team in a timely manner.
- **USDA Hold** – Agency has violated USDA policies and must implement a corrective action plan.
- **Report Hold** – Monthly reports must be submitted through the online reporting system on the 8th of the following month that is being reported (Example: November's report due on December 8th). Please note, Agencies may be placed on a hold for failure to submit monthly reports for any CTFB program.

SUSPENSION

- The purpose of a suspension is to discontinue a Partner Agency's Food Bank use for a specific amount of time due to a major violation. A suspended agency loses all the rights and privileges of a Partner Agency as well as its status as such.
- A Partner Agency may be suspended without first being placed on Hold for serious violations.
- A suspension shall not last more than six months.
- The suspension and corrective action plan must be communicated in writing to the Partner Agency.
- A suspended Partner Agency may regain its Partner Agency status if the Network Services Manager approves and if the Agency has completed its corrective action plan.
- Example of a suspension violation (but not limited to): Moving Food Bank resources to a new location without previous approval.

SUSPENSION: EXCESSIVE MONTHLY REPORT HOLDS

- Once an Agency has accrued 4 report holds in a calendar year, the account will automatically be suspended until the 1st of the following month. The suspension will not be removed until the 1st of the following month, even after the late report is received.
- Every late monthly report received after an Agency has accrued 4 report holds in a calendar year will automatically be suspended until the 1st of the following month. The suspension will not be removed until the 1st of the following month, even after the late report is received.

Excessive holds in a calendar year may lead to termination.

TERMINATION

The purpose of termination is to discontinue a Partner Agency's access to the Food Bank due to a violation or partner/food bank request. Termination means that an agency loses all rights and privileges of a Partner Agency as well as its status as such.

- A Partner Agency may be terminated without having first been put on hold or suspension for serious violations
- The termination notification must be communicated in writing to the Partner Agency
- A terminated Partner Agency may reapply to become a Food Bank Partner Agency no sooner than one year after termination
- Example of a termination violation (but not limited to): Partner Agency selling food that it has received from the Food Bank

APPEALS PROCESS

- A Partner Agency may appeal a suspension or termination, but not a hold
- A Partner Agency must submit a written appeal to the Network Services Director within ten working days of their suspension/termination notice. If the appeal is not received within 10 working days, an appeal hearing will be denied
- An appeal hearing of the Food Bank CEO, VP of Network Services and Programs, and Network Services Director will convene to address the appeal. The Food Bank membership privileges of the Partner Agency may be suspended pending the decision of the hearing
- A notification of the appeal decision will be sent to the Partner Agency within seven working days
- If a terminated Partner Agency is reactivated as a Food Bank Partner Agency, it will be placed on a 90 day evaluation period. At the end of the 90 days the partnership will be assessed by the Network Services Director to ensure that all minimum requirements are being met. If the Agency has failed to meet these standards the partnership will be terminated with no appeals process

HIATUS STATUS

If your agency anticipates an inability to distribute food for a pre-determined amount of time (for example, you are closed during the summer months), connect with the Network Services team to discuss moving to a Hiatus status. This temporary status may allow your organization to remain in good standing with the Central Texas Food Bank during your temporary suspension of operations.

PROGRAMS & RESOURCES

FOOD HUBS

To date the Central Texas Food Bank has identified two priority regions in need of additional access to fresh produce to meet the needs of clients in the area – Bell County and Burnet County. In order to meet this need, CTFB has established ‘Food Hubs’ in these areas. CTFB directly provides weekly/bi-weekly deliveries of fresh produce to a partner in the area with the purpose of it being redistributed to other nearby Partner Agencies. Partner Agencies are encouraged to source fresh, healthy produce through the produce hubs. This food is separate from regular Food Bank orders and is coordinated directly with the host site. All food hubs currently require no handling fees, mixed loads of a variety of produce, and flexible pick-up times. To participate, Partners must sign the Food Hub Agency Agreement online and submit a pick-up request form to the site of their choosing.

FRESH FOOD FOR FAMILIES-FFFF

Fresh Food for Families provides free monthly distributions of fruits, vegetables and other fresh foods to low-income families. These distributions supplement existing grocery budgets with much-needed nutritious foods.

HOPE (HEALTHY OPTIONS PROGRAM FOR THE ELDERLY)

The mission of the Healthy Options Program for the Elderly (HOPE) is to reduce hunger among low-income seniors age 55 or older by providing them with free monthly distributions of healthy, shelf-stable foods. Each month, HOPE clients receive a 15- to 20-pound bag of non-perishable groceries as nutritious additions to their existing diets. Items include canned fruits and vegetables, canned protein, cereal and pasta

KIDS CAFÉ

Kids Cafe serves as a direct partnership between the Food Bank and existing after-school programs to provide nutritious meals to low-income children who may not otherwise have access to healthy and balanced nutrition outside of school. Kids Cafes are safe, nurturing places where neighborhood children can go after school to

receive a free meal and participate in programs such as homework assistance, physical activities and more.

SUMMER FOOD SERVICE PROGRAM (SFSP)

The Summer Food Service Program (SFSP) provides nutritious lunches and snacks to children of low-income families who lack a dependable source of nutritious meals during summer breaks. SFSP is a program of the U.S. Department of Agriculture.

BACKPACK

The Backpack program is designed to meet weekend meal needs for children in low-income families. At the end of each week, participating children receive bags of healthy, nutritious, non-perishable meals that they take home with them and eat during the weekend. Each Backpack contains approximately four meals.

MOBILE PANTRY

By taking the food directly to clients, our mobile food pantries fill geographic and service gaps in emergency food assistance by providing Central Texans in need with basic staples, fruits and vegetables, and frozen foods where local food assistance services cannot keep up with demand.

CHOICES NUTRITION EDUCATION

CHOICES is a nutrition education program that helps individuals and families make smart choices at mealtime. The classes help people eligible for SNAP (food stamps) make healthy food choices within a limited budget and choose active lifestyles. All classes are free and open to qualified individuals.

DISASTER RELIEF

When the unthinkable happens, the Food Bank is prepared to respond. We work with Feeding America, the American Red Cross, federal and state agencies and other partners to provide direct food and water assistance, transportation of emergency supplies to affected areas and more.

SOCIAL SERVICES

Social Services outreach and education provides one-on-one application assistance to families and individuals qualifying for SNAP (food stamp) benefits to help them move out of the hunger line. The Food Bank's Social Services Outreach (SSO) coordinators provide phone and in-person consultations for families and individuals in need of social services assistance. In partnership with Texas Health and Human Services, SSO coordinators educate community members and Partner Agencies on state-administered and federally-funded social services and health care programs:

SNAP (food stamps)

- Children's Medicaid
- Medicaid for adults
- CHIP (Children's Health Insurance Program)

- CHIP Perinatal Program
- TANF (Temporary Assistance for Needy Families)
- Women's Health Program (family planning and health screenings)

SSO workers help in several ways:

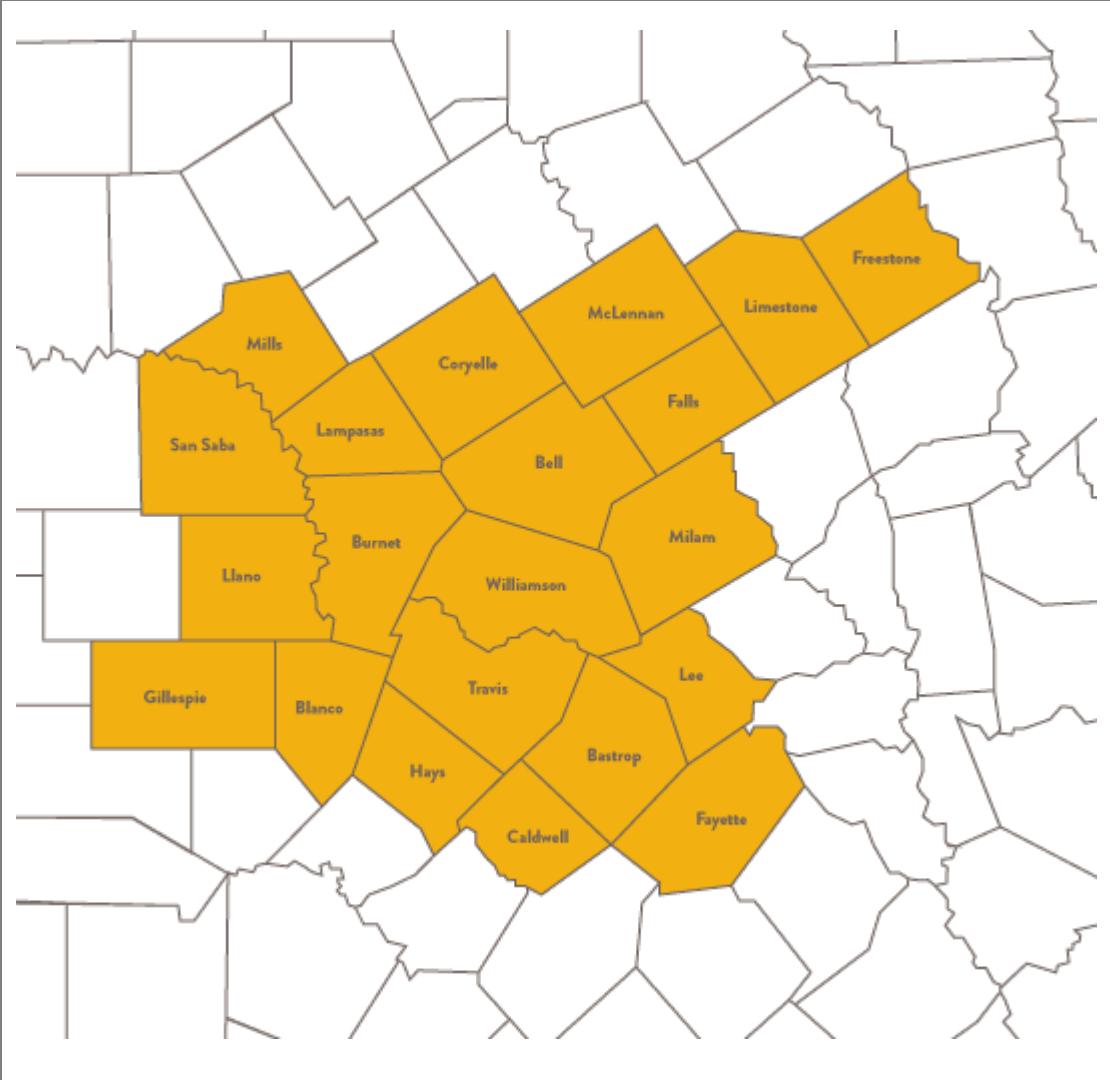
- explaining social services programs
- filling out applications completely and correctly
- delivering completed applications to HHSC
- following up on applications
- advocating on behalf of applicants

Notify your portfolio manager if you are interested in having an SSO coordinator offer the above assistance to your clients!

ADVOCACY

The Food Bank realizes hunger is a symptom of other societal problems such as economic conditions, poverty and unemployment. Other issues including drought, food and gas prices, healthcare costs and limited social service support also affect the demand on services provided by Food Banks and our Partner Agency networks. The Food Bank continues to be a leader in public policy issues affecting hunger – from City Hall to the U.S. Capitol. We work in partnership with other Texas Food Banks as well as many other organizations on behalf of the hungry, to ensure that access to healthy food is available for all Central Texans. As a Food Bank Partner Agency, we ask that you not only stay informed about our advocacy & public policy efforts, but get involved and participate in them. Advocate for hunger relief – sign up for our action alerts at <https://www.centraltexasfoodbank.org/get-involved/advocate>.

CENTRAL TEXAS FOOD BANK – 21 COUNTY SERVICE TERRITORY



APPENDIX – CHANGE LOG

The following changes were made to the November 2022 Policy & Procedures Manual:

Formatting: The format and order of information has been revised throughout the manual to support flow and clarity of information. Resources have also been hyperlinked throughout, which may be accessed when viewing an electronic version of the manual.

Contact Information: Contact information has been updated to reflect CTFB's current organizational structure and team composition (page 3).

Appointment/Scheduling Systems: Requirements regarding public notification, written procedures, and serving walk-up clients for distributions that use a scheduling/appointment system (page 16).

Alternative Distributions: Additional guidance on direct delivery models, collaborating with other organizations, and mobile distributions (page 16-17).

Facility and Food Storage Requirements: Additional guidance on facility requirements, including availability of cold storage, storage temperatures, and food clearance from walls/floor (page 19).

Client Eligibility & Application: Revisions include removal of client signature requirement, clarity regarding eligibility criteria and process, household definition, confidentiality expectations, proxy process, and guidelines for Partner Agencies serving target populations (page 22-25).

Civil Rights: Additional guidance on handling programmatic and Civil Rights complaints (page 28).

USDA Nondiscrimination statement: Includes revised USDA Nondiscrimination Statement and requirements for including the NDS on Partner Agency materials (page 29).

Training: Includes Oasis Insight User Confidentiality training requirements (page 31).

Record Keeping: Additional guidance on External Financial Audit requirements (page 32), City of Austin Health Permitting information (page 33), and record keeping practices for paper and electronic client data (page 34).

Agency Status: Additional information on available Hiatus status (page 38).