

**STATE OF HAWAII**  
**DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS**

**OFFICE OF**  
**COMMUNITY SERVICES**

**COMMODITY SUPPLEMENTAL**  
**FOOD PROGRAM**

**State Plan**

**November 2016**

# Community Supplemental Food Program (CSFP)

## **Introduction**

The Commodity Supplemental Food Program (CSFP) initially authorized under the Agriculture and Consumer Protection Act of 1973, to improve the health of low-income pregnant and breastfeeding women, new mothers up to one year postpartum, infants, children up to age six, and elderly people at least 60 years of age by supplementing their diets with nutritious United States Department of Agriculture (USDA) foods.

However, the Agricultural Act of 2014 (P.L. 113-79, the 2014 Farm Bill) phases out all services under CSFP for pregnant and breastfeeding women and new mothers. New admissions for services under CSFP are now limited to low-income “elderly” adults at least 60 years old. Accordingly, CSFP in Hawaii is limited to this demographic alone.

This document is the State of Hawaii’s revised submission and implementation plan for Fiscal Year 2015. It includes USDA regulations, State and Sub-grantee responsibilities, staffing, individual’s eligibility requirements, plan descriptions, benefit levels, client rights, and complaint procedures, and other such State plan requirements as addressed in 7 CFR 247.6.

The CSFP Program is administered by the State Office of Community Services (OCS), which is administratively attached to the Department of Labor and Industrial Relations (DLIR). Under Hawaii Revised Statutes Chapter 371K, OCS is charged to serve “low-income, disadvantaged, immigrant, and refugee” populations in the State. OCS has considerable experience in administering Federal food distribution programs, including The Emergency Food Assistance Program (TEFAP) and the Senior Farmers’ Market Nutrition Program, both of which are also run by the USDA.

## **Statement of Need**

Hawaii has an estimated population of 1.4 million people. Out of those 1.4 million people, there are 237,918 seniors who reside in Hawaii. But out of those 237,918 seniors, 7.4% of seniors ages 60 or above live below the 200% poverty threshold<sup>1</sup>. This means that around 17,606 seniors 60 years old or older are making less than \$27,340<sup>2</sup> annually.

The State of Hawaii has one of the highest costs-of-living in the nation, with the Federally-approved Cost-of-Living adjustment for Federal employees serving in this locality at 16.81%.

---

<sup>1</sup> Hawaii’s Older Adults: Demographic Profile  
([http://uhfamily.hawaii.edu/publications/brochures/OlderAdults\\_DemographicProfile.pdf](http://uhfamily.hawaii.edu/publications/brochures/OlderAdults_DemographicProfile.pdf))

<sup>2</sup> 2016 Health & Human services Poverty Guidelines/Federal Poverty Levels  
(<https://www.payingforseniorcare.com/longtermcare/federal-poverty-level.html>)

Our unique geography and little arable land necessitates the importation of most of Hawaii's food from outside the State, adding shipping costs to the price tag of each of our already costly commodities.

Programs like CSFP help those living in poverty, but the program is only offered to Oahu residence. CSFP has been administered by HFB for over a year now, and the agency has had great success and has been hitting its monthly goal. But Hawaii doesn't just consist of Oahu alone. So by expanding Hawaii's CSFP caseload from 2,400 to 4,500 the program will be able to not only help seniors living in poverty on the island of Oahu, but seniors living in poverty state wide.

### **Compliance with USDA regulations**

#### **7 CFR Part 250-Donation of Foods for use in the United States, etc.**

Under the current plan, OCS shall be the agency designated by the State to administer the program. OCS shall enter into a written agreement with USDA pursuant to 7 CFR part 247, and supplementary to any agreement now entered into under TEFAP.

Using OCS' existing network of distribution providers and Food Bank member agencies, OCS will determine a distribution schedule compatible with the arrival of commodities ordered under the program.

#### **7 CFR Part 247-Commodity Supplemental Food Program Requirements**

To fulfill the purpose and scope of the CSFP, Hawaii, as synopsized in the introduction, is requesting a maximum caseload of 4,500 seniors. This will allow Oahu and the neighbor islands to comfortably introduce, outreach, and implement the program state wide.

OCS will administer the program at the State level and, as stated above, will enter into necessary agreements with USDA upon notice of award. Contracts will also be entered into with subdistributing agencies for the implementation of the program. These agreements will clearly delineate responsibilities and service areas of each party named in the agreement. Each agreement will be signed and executed before commodities or administrative funds are provided to any agency. Agreements will include all assurances as outlined under 7 CFR 247.4 Specific responsibilities will be discussed in the State/local agency responsibility portion below.

#### **Specific Responsibilities of Agencies under this Plan**

The Hawaii Food Bank (HFB) is currently the only agency that is administrating CSFP, but if Hawaii is given the additional caseloads we request, then we will be able to administer CSFP state wide instead of only in the City and County of Honolulu. Maui Food Bank (serving the County of Maui), and the Food Basket (serving the County of Hawaii) have expressed interest in

administering CSFP and HFB would expand services to the County of Kauai should additional caseloads be available. The number and names of the subdistributing agencies is contingent on the additional caseload that Hawaii is granted.

OCS will partner with all three agencies to achieve the purpose and scope of CSFP. A broad overview of plans relating to the listed responsibilities will be discussed in the appropriate sections below. If Hawaii receives additional caseloads, then this part of the State Plan will be amended to portray in more detail the subdistributing agencies administering CSFP and their roles and responsibilities.

The agencies and their respective responsibilities are:

Office of Community Services

Rona Suzuki  
Executive Director  
Office of community Services  
State of Hawaii  
830 Punchbowl Street Rm. 420  
Honolulu, HI 96813

In compliance with 7 CFR 247.2, responsibilities not to be delegated are the following:

- 1) Establishing eligibility requirements
- 2) Establishing a management review process

Specific eligibility requirements will be outlined in the eligibility section below. Management review, monitoring requirements, and fiscal systems will be described in the management process section below.

In addition to non-delegable responsibilities OCS will achieve the following:

- 1) Draft and enter into required agreements;
- 2) Establish complaint submission and resolution procedures;
- 3) Comply with Civil Rights requirements and establish guidelines for member agencies to ensure compliance;
- 4) Complete and update the State Plan, as necessary;
- 5) Select local agencies through criteria established by 7 CFR 247.7;
- 6) Determine caseload needs and request such caseload through the State Plan;
- 7) Determine each agency's eligible caseload and assign appropriately;
- 8) Establish and maintain monitoring protocols to assure adherence to management system;
- 9) Work with Local Agencies to prevent dual participation;
- 10) Assist in plan development for each agency's nutrition education;

- 11) Establish appeals and fair hearings processes for agencies and participants;
- 12) Investigate and, when appropriate, pursue claims against agencies or participants;
- 13) Maintain communication with USDA and provide guidance to Local Agencies;
- 14) Ensure program participation does not exceed caseload limitations; and
- 15) Perform other general duties necessary for program maintenance.

The possible subdistributing agencies administering CSFP for FY2017 are:

Hawaii Foodbank

Mr. Gerald Shintaku  
President & CEO  
2611 Kilihau Street  
Honolulu, HI 96819-2021

The Food Basket, Inc.

Mr. En Young  
Executive Director  
40 Holomua St.  
Hilo, HI 96720

Maui Foodbank

Mr. Richard Yust  
Executive Director  
760 Kolu St.  
Wailuku, HI 96793

Responsibilities of the subdistributing agency include:

- 1) Determine eligibility of CSFP applicants;
- 2) Compliance with fiscal and operational requirements set out by the State;
- 3) Ensuring program participation does not exceed caseload;
- 4) Order commodities for distribution;
- 5) Issuance of foods to participants in accordance with established food package guide rates;
- 6) Assistance in plan development for nutrition education;
- 7) Implementation of the nutrition education plan, and provision of information regarding other nutrition and health assistance programs;
- 8) Informing applicants of their rights and responsibilities in the program;
- 9) Meeting the needs of the homebound elderly;
- 10) Pursuing claims against participants
- 11) Complying with all Civil Rights requirements; and

12) Other duties as necessary for the maintenance of the program.

**Staffing**

The State proposes a total of .5 FTE OCS personnel to administer the program. This will consist of:

1 Program Specialist	.15 FTE
1 Senior Accountant	.15 FTE
1 Fiscal Staff	.10 FTE
1 Supervisory staff	.10 FTE

The Program Specialist is directly responsible for drafting agreements, , drafting plans related to nutrition, outreach, and other applicable activities, establishing appropriate provisions for compliance Federal requirements with guidance from USDA, maintaining open communication both with USDA and sub-grantee agencies, determine and distribute caseload as appropriate, conduct on-site program monitoring to ensure compliance with applicable Federal and State requirements, and pursue necessary action relating to claims against any member agencies or participants.

The Senior Accountant and fiscal staff are responsible for accurate accounting of administrative funds allocated for each agency, on-site fiscal monitoring to ensure compliance with Generally Accepted Accounting Principles (GAAP), review of single audits or other appropriate documents submitted by sub-grantee agencies, and timely processing and issuance of payments requested for administrative reimbursements.

OCS supervisory staff will oversee the work of the program specialist to prepare and revise the CSFP Policies and Procedures and State Plan, and help in problem-solving and quality assurance.

The position title, position description, and the position full time equivalent, for the subdistributing agency, is contingent on the amount of additional caseloads FNS grants Hawaii. Once Hawaii gets the new caseload amount, then we will be able to determine the position title, position description, and the position full time equivalent for FY2017.

**Eligibility**

Eligible participants during the initial year of the program shall be low-income persons at least 60 years of age. To be eligible, each applicant must provide documentation of household income at or below 130% of the Federal Poverty Income Guidelines for Hawaii; each person must provide documentation that he/she resides in the City and County of Honolulu; and each person must provide information sufficient to ensure that OCS and the Local Agencies can verify that the person is not receiving benefits under CSFP at more than one location.

## Certification Protocol

All subdistributing agencies will provide staff or trained volunteers to conduct Intake and Assessment activities. Each volunteer or staff will inform the applicant as to their Civil Rights and responsibilities under CSFP. A written statement will be included in the application materials regarding non-discrimination based on Federal protected classes. Upon completion of the application of the materials by the applicant or their adult caretaker, the applicant will certify by checking “YES” on their form that they have either read or been read the dual participation and information sharing statement, and have fully-understood the consequences of their actions. The applicant must also verify they will notify the agency within 10 days of any changes to their household income or household size. Agency staff will also provide relevant information on other programs designed to supplement nutrition, as well as other programs pertinent to the particular case.

All agency staff will then verify each application for accuracy by checking Income Verification, Proof of Residency, and Proof of Age. Single documents may be used to verify multiple categories. Acceptable documents include, but are not limited to:

### Identification

- Government-Issued Identifications including,
  - Passport
  - Driver’s License
  - State Issued Identification

### Income

- Income tax statement for prior year
- W-2 Wage Statement
- Social Security Check, Direct Deposit Statement, or award letter
- Other Deposit statements
  - Trust Fund Payments
  - Taxable Annuities
  - Personal Retirement funds
  - Private Pensions
  - Child Support/Alimony
  - Allowance
  - Royalties
  - Other Cash Income
    - Gaming winnings, etc.
- Receipts of other Federal Aid, excluding those exempted by Legislation
  - Unemployment benefits
  - Student Aid, except expenditures on qualified costs including tuition, books, fees, transportation, and supplies.

## Residency

Housing lease or rental agreement or receipt for rent showing local address  
Recent (3-month) utility bill showing a local address for service  
Local, Government-issued identification showing local address  
Ballot stub for local area election

There is no citizenship requirement for CSFP. Any person lawfully present in the United States and residing in the service area – the City and County of Honolulu – who meets the income and age requirements may participate, subject to the caseload limit of 2,400 persons.

HFB staff will review each document or combination of documents which substantiate identity through at least one (1) photo ID, and one document from the residency list above. HFB will also tabulate total income by adding tallying the individual amounts of funding from each source. When calculating total household income, certain sources of Federal and private funds may or must be excluded from income as provided by Legislation, specifically 7 CFR 246.7(d)(2)(iv)(C).

Sources not to be construed as income include, but are not limited to:

- Military Housing Allowance
- Non-Cash benefits/transactions, including in-kind payments
- Certain Excluded Job Categories
  - Job Training Partnership Act employment
  - Census Bureau temporary employment
- Commodity values and cash values provided under Federal Nutrition Programs, the Child Nutrition Act of 1966, National School Lunch Act, as amended, and the Food Stamp Act of 1977 including, but not limited to:
  - National School Lunch Program
  - Special Milk Program
  - School Breakfast Program
  - Summer Food Service Program
  - Child and Adult Care Program
  - Supplemental Nutrition Assistance Program (SNAP)
  - Food Distribution on Indian Reservations (FDPIR)
  - The Emergency Food Assistance Program (TEFAP)
  - Temporary Assistance for Needy Families (TANF)
- Student Assistance for students attending an institution at least half-time for the following costs:
  - Tuition
  - Fees
  - Materials
  - Supplies
  - Transportation
- Such assistance includes, but is not limited to:
  - Pell Grants
  - College Work Study Programs

- National Direct Student Loans
- State Student Incentive Grants
- Any child care payments made under section 402 (g)(1)(e) of the Social Security Act
- Bank Loans
- Lump Sum payments derived from settlements or lawsuits, provided that withdrawals from the settlement or payment will be counted as income

After considering these factors, subdistributing agency staff may, if appropriate, certify the applicant at the point of application. Each subdistributing agency may either consider the household's average income over the previous twelve months or current household income, to determine the income level most reflective of the applicant's situation. If further documentation is required, the applicant may be certified upon additional documentation. If further consideration is necessary, whether from additional scrutiny of income documents, third-party verifications, or for any other reason a determination shall be made within ten (10) days of the date the applicant certifies the application.

The applicant will then be eligible to participate in the program until the last day of the sixth month following the acceptance of the application. At least one (1) month before the end of the applicant's eligibility period, a letter will be sent to the applicant to indicate the expiration of eligibility and inquire about continued interest. If the person indicates continued interest by checking the box, as well as shows no change of address or income, the person may be considered eligible for an additional six (6) months.

If any agency has any reason to believe the participant may have had a change in income, household size, or any other criteria used to determine eligibility, or, if any subdistributing agency feels it's necessary to conduct random eligibility monitoring, the participant applying for reauthorization may be requested to re-apply in person at the specific subdistributing agency or at a qualified application event. However, such a request may not be discriminatory in nature.

If a person is deemed ineligible, they must be informed in writing. The letter will include the reason for denial as well as procedures for appeal, should the applicant wish to do so. Procedures will be outlined below in the Client Rights section.

### **Accommodations for Homebound Elderly**

If a person who is disabled or for any other reason is unable to collect their own food package, a proxy may be designated on their behalf. The proxy must attend an application session, either with the homebound client or in their stead, to receive Civil Rights and other pertinent program information. Qualification documents must be presented by the proxy at the time of application. In addition, the proxy must sign a Proxy Form attesting they are authorized by the applicant to receive their share of goods on their behalf. The proxy form must be signed by the applicant during the application process. If the applicant is unable to attend, their signature on the form must be compared with a government-issued photo ID containing their signature.

The proxy form shall be kept in the approved participant's file. When receiving goods, the proxy will present to agency staff a valid, identification. Living situation, age, mobility, or disability

will not preclude any agency from serving an individual. Each subdistributing agency will consider reasonable accommodations for anyone deemed eligible for the program.

### **Nutritional Risk Criteria**

Currently, the State of Hawaii will exercise its right to choose not to establish a Nutritional Risk Criteria. Although documented well in other areas, there is little specific data for Hawaii supporting the correlation between low-income persons and poor nutrition. As the program collects more longitudinal data, low-income may be formally established as a criterion, along with other criteria that may arise. However, in order to fulfill OCS' mandate, we are required to serve low-income individuals.

### **Outreach**

All subdistributing agencies and OCS will collaboratively provide outreach for the CSFP program. OCS staff will gather State resources to disseminate information about the program. With its mandate to serve low-income persons and long history of contracting to providers to provide services for this population, OCS has built relationships and programs designed specifically to target members of this population. Notable examples of State-funded services include:

- 1) Transportation for Low-Income Persons
- 2) Employment Core Services for Low-Income Persons

Examples of relevant Federally-funded programs run by OCS include:

- 1) Weatherization Assistance Program for Low-Income Persons (WAP)
- 2) Senior Farmer's Market Nutrition Program (SFMNP)
- 3) The Emergency Food Assistance Program (TEFAP)

Additionally, OCS is the State entity administering the Community Services Block Grant (CSBG), a formula grant directed to qualified Community Action Agencies (CAA's) within the State. This relationship allows OCS access to outreach to clients through the CAA's auxiliary programs. Notably, these include the Low-Income Home Energy Assistance Program (LIHEAP) and the Senior Community Service Employment Program (SCSEP). These two programs will provide valuable inroads to the target population.

All subdistributing agencies, through their large network of congregate feeding sites, qualified pantries, and household commodity distributors will initiate outreach through their existing network of providers. Two strategies that each subdistributing agency may use to begin direct outreach upon notice of award through existing programs. In addition, all subdistributing agency provide food, through other funds and programs, to low income individuals, and could adopt the strategy as Hawaii Food Bank.

First, each subdistributing agency will sort through existing clients to find those meeting the more stringent 130% of FPL requirement set out by CSFP.

Secondly, only seniors, as well as senior residential housing with income requirements similar to the program will be approached first. This will allow subdistributing agencies to ramp up the program quickly.

After the initial thrust, member agencies with similar objectives will be approached. For example, two in-home and homebound programs, Lanakila Meals-on-Wheels and Hawaii Meals-on-Wheels will be approached with the program. This will allow subdistributing agencies increased access to elderly homebound clients. Partnership with these agencies will use existing distribution routes to save administrative and distribution costs.

Finally, subdistributing agencies will embark upon a media campaign consisting of three components. Direct mailings to residences will target housing complexes that may not necessarily have a low-income requirement, but may have a large senior population nonetheless. Direct mailings to community centers, especially in low-income areas, have had a high degree of success for SFMNP, and can provide information dissemination and facilities for application events.

Posters will also be printed announcing the program. These will also be included in mailings to Community Centers, and will display general information about the program, as well as application and contact information useful for potential clients.

Subdistributing agencies will also utilize the network of Public Service Announcements. These are spread throughout several types of broadcast media, as well as the public transit system. Announcements will contain information pertinent to applications for the program.

Outreach evaluation shall be conducted on a yearly basis. The application form will ask by what method the applicant received notification of the program. These options will include all media outreach strategies outlined above, as well as other possible options, including “word-of-mouth,” “referral from another program,” or “prior participant. This question will assist in qualitatively evaluating outreach strategies. This will allow more effective outreach during future years of the program.

## **Service Plan**

Subdistributing agencies and OCS will provide customer-oriented service to the participants of CSFP. Direct services will not be provided to the client by the State, unless issues arise whereby the State must make a determination of eligibility due to complaint, or to investigate any of the subdistributing agency on behalf of the client. No client will be discriminated against solely on the basis of any claim made against the subdistributing agency or OCS.

Each subdistributing agency will directly assist clients during the application, delivery, re-authorization, and discontinuance process. To assure the highest level of customer service possible to the largest amount of people, the subdistributing agency and OCS will use existing contacts to provide translation, when appropriate, to those applying, receiving, reauthorizing eligibility, or being discontinued. OCS will initiate contact with translation services providers

contracted under OCS immigrant programs to provide translation in the widest selection of appropriate languages possible.

### Service Protocols

Subdistributing agency staff will serve each client in the order in which they arrive. Each subdistributing agency's staff or volunteer staff, in addition to information regarding Client Rights, will get a brief overview of other services they may access. In order to provide a holistic approach to each client's health needs, information on how to access other services will be provided with each food package. Subdistributing agency staff or volunteers will also be available during each application event to answer any questions about additional services. Should any client have questions regarding any services they may seek to access, agency staff or OCS will be available during work hours to answer any questions or refer the client to a source with the requested information.

Each subdistributing agency will provide eligible participants with nutritional education.

In order to provide excellent service, the client must be informed as to expectations for the eligible period. The client will be informed, upon successful application, details relevant to their particular distribution. Information such as time, place, and date ranges of package arrival or delivery may all be part of the orientation. In addition, a "welcome packet" will be given to the newly qualified recipient, this will contain nutrition information, a blanket statement about eligibility period, frequently asked questions, and facts pertinent to their distribution. OCS and the subdistributing agencies will continuously gather questions and update our nutritional information and other program documents as necessary.

As stated above, the client will receive a letter near the end of their first eligibility period, and each thereafter; provided each participant must re-apply in person at least once per year. Each subdistributing agency will reserve the right to call each client in to reapply in person at the end of their eligibility period for quality assurance purposes. The client will be informed of the specific subdistributing agency's right to do so when applying and enrolling in CSFP.

### **Storing and Distribution of Commodities**

OCS and the subdistributing agencies have existing protocols that meet USDA standards for the TEFAP program. Each subdistributing agency is guided by the "Feeding America Policies and Procedures Manual," which is on file with the State and may be made available to any who wishes to inspect receipt, storage, food safety, or any other procedure relevant to CSFP. These policies will be alluded to in the plan synopsis below.

Each subdistributing agency will be responsible for multi-food ordering through the WBSCM system. Throughout the course of the year, the OCS specialist will meet with the every subdistributing agency to plan food orders and ensure that the CSFP program is progressing smoothly. The projected frequency of these meetings is approximately once a month. The ordering regime will keep commodities stocked that will adhere to food package prescription guidelines.

Once the commodities arrive, each pallet will be shrink-wrapped and dated to ensure proper First-in/First-out (FIFO) procedures. The palletized commodity will be kept separate from other USDA commodity and commodities donated by the public for general distribution. None of the commodities slated for distribution through CSFP will be distributed to anyone other than qualified participants.

Before distribution occurs, each subdistributing agency's staff and volunteers will box commodities in boxes according to package guides provided by the USDA. Initially, each subdistributing agency will distribute these boxes of one-month supply monthly. However, should it become evident distribution of a two-month supply is more cost-effective and convenient for the customer, especially in rural areas, each agency has the option to provide commodities in this manner.

Distribution will be a combination of direct services through each subdistributing agency and indirect distribution through member agencies and partners. In order to conserve administrative costs, each agency will leverage administrative funds from other distributions not specific to seniors. Food for CSFP may be transported in the same truck with commodities from other programs, such as TEFAP, to maximize cargo space utilization. However, distributions will not be intermingled. Each agency may have multiple distributions at the same location in the same day, but will not distribute commodities from different programs during the same time period.

Partners, such as proxies from senior residential housing, may elect to pick up commodity for the group they serve. This will allow efficiency in the distribution process. Additional partners include those mentioned above specifically servicing homebound elderly, such as the two Meals-on-Wheels programs in O`ahu. In addition to these efficiencies, community centers may directly distribute commodities to qualified community members. If this is the case, SUBDISTRIBUTING AGENCY or OCS staff will train each volunteer or staff of the agency on regulations applicable to CSFP, as well as pertinent information or announcements clients may require.

## **Nutrition Education**

In order to quickly implement CSFP in the State of Hawaii, DLIR-OCS and all subdistributing agencies have elected to use nutrition information provided by Kaiser Permanente at no cost to the program. This information is also provided at no charge to the SFMNP through partnership with Kaiser Permanente.

The University of Hawaii-Manoa has been approached to partner up to develop a Senior-specific educational plan. This plan will include information from commodity fact sheets provided by USDA in order to assist participants in planning for their complete nutritional needs. This plan, still under development, may include: proper nutritional accompaniment to foods on the approved package guide, specific needs of the elderly as human bodies age, calorie counts of available foods, ideal weight information, recipes, and other information necessary to allow participants to make informed choices about their health.

## Dual Participation

A provision of the Federal regulation relating to the CSFP State Plan, 7 CFR 247.6(c)(8), requires Hawaii OCS to provide “a description of the means by which the State agency will detect and prevent dual participation.” OCS has developed a set of procedures to prevent CSFP participants from enrolling in the program at more than one location and receiving commodities in excess of the quantity allotted to that participant. The following is an outline of the procedures to be followed for the prevention, detection and resolution of dual participation:

1. The CSFP law and regulations prohibit a person from receiving CSFP more benefits than those to which the person is entitled. This usually occurs because the person enrolls for CSFP benefits at more than one location without disclosing that he/she is enrolled elsewhere, and then collects commodities at both places. The CSFP regulations require the State agency and Local agencies to take measures to prevent such “dual participation.” See 7 CFR 247.19 and 247.20.
2. Hawaii OCS requires its local agency to take the following measures to prevent dual participation, to detect it when it occurs, and to take remedial action to prevent its recurrence:
  - (a) No person may enroll for CSFP benefits unless the person fills out an application form that contains the following language: “I recognize that I may not receive CSFP commodities at more than one CSFP site. I agree that, while I am enrolled at the CSFP site located at \_\_\_\_\_, I will take my commodities from that site only, and I will not try to obtain commodities from any other CSFP site. If I relocate to another home, I will notify Hawaii Foodbank and arrange for my CSFP participation to be transferred to another location. I recognize that, if I receive more commodities than I am entitled to, or if I engage in other program violations, I may be required to pay for the excess commodities that I take and I may be disqualified from further participation in CSFP. Furthermore, I am aware that the information that I have provided may be shared with other organizations to detect and prevent dual participation.”
  - (b) The Local Agency shall ensure that the applicant for benefits reads and understands this provision on the application form or that it is read to him/her in English or in another language if the applicant has limited English proficiency.
  - (c) The Local Agency shall obtain identification information from the applicant that will help ensure that the applicant cannot enroll at more than one location without detection. The Local Agency shall obtain the applicant’s Social Security number (or at least the last four digits thereof), if available. The Local Agency will obtain photo identification of the applicant. Alternative forms of acceptable photo identification include, but are not necessarily limited to, driver’s license, State ID, Alien Resident Card (“green card”), passport, or other form of government-issued photo ID. The Local Agency shall also obtain the applicant’s residence address (or location, if homeless) and telephone number (if the applicant has a telephone number).
  - (d) Not less than every six months, the Local Agency shall cross-check this identification information to detect dual participation. This cross-check process shall take place during the months of October and April.

- (e) If the Local Agency detects a case of apparent dual participation, either through periodic cross-checking or otherwise, the Local Agency shall promptly contact the participant, via telephone or in person, and discuss the matter with him/her.
- (f) If the participant admits to dual participation, or cannot be contacted, or if the Local Agency believes that the participant has not adequately explained the apparent dual participation, the Local Agency shall mail to, or hand-deliver to the participant a Notice of Adverse Action in the form set out in the Hawaii OCS Policies and Procedures for CSFP.
- (g) The Notice of Adverse Action shall be mailed or hand-delivered at least 15 days before the effective date of disqualification, which shall be set by the Local Agency. Documentation of the notification shall be maintained in a log or a copy retained in the individual's file. The Local Agency shall promptly notify the relevant sub-agency or sub-agencies of this finding of apparent dual participation. The Local Agency shall also promptly notify the State of this action.
- (h) The Notice of Adverse Action shall contain notice to the participant of the right to a Fair Hearing.
- (i) The Local Agency shall promptly hold a fair hearing in accordance with 7 CFR 247.19, 247.20, and 247.33.
- (j) The Local Agency shall take action to disqualify the participant from CSFP for a period of up to one year, unless the Local Agency determines that disqualification would result in a serious health risk to the participant.

### **Participant Rights and Responsibilities:**

Each participant or authorized representative will be informed during the certification process of his/her rights and responsibilities as set forth in 7 CFR 247.9 and 247.13 of CSFP regulations, including in a language other than English where a significant number or proportion of the eligible populations needs this information in a language other than English. Additionally, OCS' contact information will be included in application materials as the chief contact for filing grievances and complaint resolution.

Per 7 CFR 247.12, the State agency will ensure that each person will be informed of other nutrition, health, or assistance programs applicable to their case, and be referred, if appropriate.

Also, the State and the subdistributing agencies will notify the public, participants, and potential participants of the nondiscrimination policy, notify of complaint procedures regarding alleged unlawful discrimination and review and monitor program activities to ensure compliance with non-discrimination policies and procedures.

Each participant has the right, per 7 CFR 247.15, to be notified of their eligibility or ineligibility within ten (10) days of their application. Letters will contain information regarding the terms and particulars of their certification such as time frame and dates, or the reason(s) they were deemed ineligible, respectively.

Each participant has the responsibility, per 7 CFR 247.12, to inform subdistributing agencies and/or the State agency within ten (10) days of changes to a participant's household income or composition, and the right to be informed, orally or in writing, improper use or receipt of commodities, as a result of program violations may lead to a claim against the individual for the value of the benefits, and may lead to disqualification from the program.

## **Financial Management**

All fiscal duties are handled by OCS's Senior Accountant located in the Administrative Services Office (ASO). The ASO works in conjunction with the Department of General and Accounting Services ("DAGS") offices in handling the State's Financial Management System. In order to enable prompt and accurate and allocable costs and to ensure all costs claimed are in accordance with OMB Circular A-87, the Senior Accountant will participate in the collection, compilation, classification, and evaluation of fiscal data. In addition, the ASO will prepare trial balances; prepare adjusting and closing entries, verify and analyzes financial data; prepare financial statements and reports; make adjustments to journal vouchers; verify correct applications of accounting principles and mathematical accuracy; recommend changes of forms, procedures and policies governing the accounting functions; and implement changes as directed.

Funds will be obligated to subdistributing agencies through the internal Form 300 Cash request payment form and internal Form 310 Expenditure report. Once OCS receives these forms from the sub-contracting agency, payment is issued.

OCS will retain a portion of the administrative allocation, the subdistributing agencies will receive the remainder of assigned administrative funds, billing in quarterly installments.

If a subdistributing agency is overpaid or underpaid, through miscalculation, faulty reporting, or any other reason, the subdistributing agency will be notified of the error and the amount will be reconciled on the next payment.

## **Monitoring**

OCS will use their internal monitoring protocols to assure the compliance and efficiency of operations. Preliminary monitoring load consists of once-yearly fiscal and program monitoring for subdistributing agencies, either concurrently or on separate days. No less than one-tenth of agencies per year participating in the CSFP distribution will be inspected for proper procedures.

Program monitoring will, at a minimum, consist of inventory reconciliation, file review to determine inclusion of appropriate documents, food storage and safety review, and other pertinent details of the program.

Fiscal review will include, at a minimum, consist of cash payment reconciliation, review of single audits, and adherence to procedures under the State's Generally Accepted Governmental Accounting Principles.

## **Data Collection**

For the purposes of evaluating the demographics of CSFP participation in Hawaii and to ensure compliance with non-discrimination policies, OCS and HFB will collect certain data to document the demographics of the primary users of the program. These data may include age, national origin, gender, ethnicity, income, residency, and other data necessary to effectively run CSFP. None of the information collected will be used to discriminate against any applicant, except as the information pertains directly to the eligibility of the applicant. A non-discrimination statement will be included on each application form.

The following statement will be included on all written materials distributed by the program:

“In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.”

The State has also required that the Civil Rights Poster entitled “And Justice For All” to be prominently displayed at any and all venues regularly used during the distributions of CSFP commodity, and facility storing such commodities, or temporarily at sites where CSFP activities are not being held on a regular basis.

OCS will conduct a review of all files pertaining to Civil Rights policies and procedures that adhere to USDA/FNS requirements.

## **Contract**

Attached is the CSFP contract with Hawaii Food Bank, currently the only administer of CSFP, but is subject to change based on the new caseload allocations.