

**MISSOURI STATE PLAN
AMENDMENT
FOR FEDERAL FISCAL YEAR 2024**

**COMMODITY
SUPPLEMENTAL
FOOD PROGRAM**

**Missouri Department of Health and Senior Services
Community Food and Nutrition Assistance**

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INTRODUCTION:

The Missouri Department of Health and Senior Services (MDHSS) administers the Commodity Supplemental Food Program (CSFP) in Missouri in accordance with the provisions of 7 CFR Part 247 and with the provisions of 7 CFR Part 250, as applicable. The Missouri CSFP Manual for Food Banks provides details about how the program is implemented. The Missouri CSFP webpage has other information for use by the local agencies and information for program outreach. The website also provides a copy of the Missouri CSFP State Plan, links to other benefit information, blank forms and a searchable map of distribution site locations.

1. LOCAL AGENCIES, in accordance with 247.6 (c)(1):

The names and addresses of all local agencies and sub-distributing agencies with which the state agency has entered into an agreement are provided in Exhibit A. MDHSS has established sole source contracts with five Feeding America Food Banks in Missouri, referred to as local agencies in this document.

In 2020, the Missouri state agency did not renew a contract with Second Harvest who provided CSFP services in the Northwest area of Missouri. With this Federal Fiscal Year 2024 Missouri Amended State Plan, the state agency intends to contract with Second Harvest to once again serve the Northwest area of the state. The state agency visited Second Harvest to discuss the possibility of contracting to provide CSFP services and observed a program and programmatic changes Second Harvest had implemented.

2. INCOME ELIGIBILITY, in accordance with 247.6 (c)(2):

Elderly persons are income eligible if they have household income at or below 130% of Federal Poverty Income Guidelines published annually by the Department of Health and Human Services. The guidelines are also placed on the Missouri CSFP webpage.

Elderly guidelines are implemented immediately upon receipt. Income and income exclusions are defined in accordance with 7 CFR 247.9. Missouri CSFP chooses to exclude all sources of income allowed to be excluded in 7 CFR 247.9(d)(2) and excludes those required to be excluded in 7 CFR 247.9(d)(3). When warranted, all local agencies consider

the household's average income during the previous 12 months and current household income to determine which more accurately reflects the household's status per 7 CFR 247.9(d)(4).

Given the announced Proposed Rule to increase the income eligibility, Missouri will also increase the eligibility percentage to match any final outcome. Missouri understands the Proposed Rule stipulated 150% of the Federal Poverty Income Guidelines, but was seeking comment on the return to CSFP's original guidance of 185%.

3. CERTIFICATION PERIOD, in accordance with 247.6 (c)(12) and 247.16 - Implementation of the Agriculture Improvement Act of 2018 (P.L. 115-334):

Local agencies are required to adhere to the three-year certification period. This certification period is allowed under the condition that on an annual basis local agencies administering CSFP, conduct an informal certification applicable to the participant. The local agencies review the following during the informal certification:

- (1) Verify the address of the participant;
- (2) Have sufficient reason to determine that the participant still meets the income eligibility standards, which may include a determination that the participant has a fixed income; and
- (3) Has verified the participant wishes to continue to receive CSFP services.

Once approved, new certification periods must be implemented immediately for new CSFP applicants and on a rolling basis for current participants on the date that their current certification period expires, provided that such participants continue to meet all other eligibility requirements outlined in 7 CFR 247.9.

4. NUTRITIONAL RISK CRITERIA, in accordance with 247.6 (c)(3):

Nutritional risk criteria are not evaluated in the Missouri CSFP.

5. SERVICE PLAN AND CASELOAD NEEDED, in accordance with 247.6 (c)(4):

The available caseload is allocated to the local agencies taking into consideration the need in the service area, the request for caseload submitted by the local agencies and the demonstrated ability of the local agency to administer the program. The local agencies may establish agreements with other public or private non-profit agencies to certify applicants and to distribute food packages in accordance with federal regulation and Missouri CSFP policies and procedures.

Residency Requirement:

Persons eligible for Missouri's CSFP must reside in the state of Missouri and within the service area of the local agency. There are no duration or fixed residency requirements. Migrant and seasonal farm workers shall be considered as meeting the residency

requirement. Local agencies are authorized to serve residents from counties outside their normal service area as long as the area served does not overlap another local agency's service area. Elderly persons living in nursing homes are not eligible for CSFP benefits.

Individuals Applying to CSFP:

The application requires the applicant to provide name, address and date of birth. The certifying authority must indicate the on the back of the application, the source document used to verify age and Missouri residency. Household income is required, but is self-declared. As stated earlier, Missouri CSFP excludes income permissible by 7 CFR 247.9(d)(2) and excludes income required to be excluded in 7 CFR 247.9(d)(3). Household size and age is also gathered. Per 7 CFR 247.8(b) the application contains the paragraph regarding Federal assistance and certifying the information that was provided on the application and the release of information statement with the Yes or No to be checked. The top of the application requires the applicant to indicate whether or not they are already participating in obtaining CSFP food product at another location.

Caseload Needed:

The Missouri Department of Health and Senior Services administers CSFP. Data obtained from the Census Bureau indicate a significant number of elderly adults live in poverty in the service areas. For the 2024 calendar year, Missouri is requesting an increase in caseload of 1,380. While COVID still has had an impact on Missouri's metropolitan areas of St. Louis and Kansas City, the other local agencies have been maintaining levels and have the ability to meet a caseload increase through moving some individuals off of waiting lists and through adding additional distribution sites. The bulk of this request is in reference to Missouri's desire to contract once again with Second Harvest. It is the state agency's desire to provide Second Harvest with a beginning caseload of 1,000.

Missouri has a large number of seniors located in metropolitan areas, however, they are simply not seeking CSFP food services. It is assumed this is because the metropolitan areas have other avenues for resources where seniors may obtain food. The rural area of Southeast Missouri has a very large wait list of seniors who could benefit from this program as there are not many other services in that area of the state. The local agency in the Southwest area of the state has added distribution sites. The local agency which provides CSFP for the Central and Northeast portion of the state has been utilizing services from a third party for delivery. This partnership has made it possible for the local agency to provide more caseload to homebound participants.

Given the announced Proposed Rule to increase CSFP income eligibility standards to 150% or 185%, and Missouri's desire to add the Second Harvest local agency, Missouri does anticipate additional need in caseload.

6. OUTREACH PLAN, in accordance with 247.6 (c)(5):

Outreach activities are conducted at both the state and local agency level. The Missouri Department of Health and Senior Services has developed several outreach flyers that are available on the Missouri CSFP webpage to promote and advertise CSFP to the elderly. Statewide press releases are issued through the Missouri Governor's Office as appropriate to highlight newsworthy program events.

Local agencies use the outreach flyers at social service outlets, doctors' offices, clinics, hospitals, social security offices, senior citizen centers, churches and unemployment offices when caseload is available. A toll free number is provided on the outreach flyers to direct potential participants to the nearest CSFP local agency.

7. SYSTEM FOR STORING AND DISTRIBUTING COMMODITIES, in accordance with 247.6 (c)(6):

USDA commodities are shipped directly to the local agency warehouse from the multi-food warehouse and from commercial food manufacturers under USDA contracts. The state submits all direct shipment requests into the web-based system and monitors all multi-food shipment requests placed into the web-based system by the local agencies. Local agencies are responsible for the receipt, storage and safe handling of commodities; the preparation and distribution/delivery of the food packages; communicating with the state agency regarding any food loss, receipting issues, etc.; reporting CSFP product receipts and distribution (FNS-153) information monthly; and monitoring each distribution site annually.

Local agencies recruit and/or establish food distribution sites. Each site conforms to local, state and federal health standards and enters into an agreement with the local agency to assure proper food handling, storage and distribution procedures and record requirements are maintained. Distribution sites are required to complete the certification process every three years and on an annual basis verify desire of participant to remain on the program, inquire about any potential income changes and verify address compliance. Agreements must include, at a minimum, the items required in 247.4.

Distribution sites, under agreement with the local agency, assure that adequate care and security is provided for the CSFP food while in their possession. Food packages are stored in adequate and secured areas at each distribution site to safeguard from spoilage, infestation, fire and other losses. These storage areas may also be used to store The Emergency Food Assistance Program (TEFAP) commodities or other USDA foods for local use and distribution. Other commodities must be inventoried and stored separately. Inventory and distribution amounts as well as participant data are reported monthly to local agencies who in turn report information to the state agency on the FNS-153.

Participants pick up food packages at the designated distribution site once each month during the distribution sites normal hours of operation. Distribution site staff can contact participants who do not arrive to verify whether or not they are able to pick up the food package on a different day/time within the month. If the participant cannot pick up the food

package, the distribution site is to move to the wait list in order to attempt to distribute the food package to an eligible, certified individual. Staff or volunteers at the distribution site verify eligibility and identity of recipients or proxies prior to distributing the food packages.

8. NUTRITION EDUCATION PLAN, in accordance with 247.6 (c)(7):

Local agencies are responsible for making nutrition education available to all adult participants. At a minimum, local agencies distribute nutrition education information within monthly food packages in the form of a flyer, newsletter or handout. The state agency has developed a list of nutrition education resources available on the web and through various Missouri departments.

In addition, state agency staff receive updates from various organizations, such as the National CSFP Association, the USDA, etc. Any information that pertains to nutrition education which may be of benefit for Missouri seniors, is shared with local agencies to determine if they would like to distribute the material in food packages.

9. DETECTION OF DUAL PARTICIPATION, in accordance with 247.6 (c)(8):

Local agencies are required to establish safeguards against dual participation at more than one CSFP site at the same time by establishing procedures that identify participants who are participating in two different sites or by establishing specific service areas for each distribution site. In addition, there is a yes/no question on the Participant Application applicants are to complete regarding whether or not the applicant or any qualifying household member participates in CSFP at another site. Some local agencies and distribution sites utilize a program for tracking CSFP participation.

10. COST EFFECTIVE CLAIM STANDARDS, in accordance with 247.6 (c)(9):

The Missouri Department of Health and Senior Services (DHSS) has established the following cost effective claim standard: The pursuit of a claim against a participant to recover the value of CSFP commodities improperly received or used is cost effective when the value exceeds \$100 or 5 months of CSFP benefits. Local agencies are required to use this standard in determining if a claim is to be pursued and to pursue claims in accordance with 247.30 and Missouri CSFP policies and procedures. Missouri will utilize the pricing list, provided by the USDA in the fall of the year, to determine costs of any CSFP food product for which a claim must be filed.

DHSS follows USDA guidance when determining if a claim against a local agency needs to be established. The same pricing list indicated above is also utilized when forming the cost of the CSFP food product when filing a claim against a local agency.

11. HOMEBOUND ELDERLY, in accordance with 247.6 (c)(10):

Local agencies are required to make the necessary arrangements to meet the needs of homebound elderly. They are encouraged to coordinate these efforts with the local Area

Agency on Aging (AAA) and the homebound “Meals on Wheels” program. Local agencies work with AAAs to identify potential homebound participants, to conduct outreach and to conduct certification and delivery of food packages. Homebound elderly individuals are given priority over non-homebound elderly when applications exceed the assigned caseload level. Local agencies allow designated proxies to pick up food packages for homebound elderly individuals.

In accordance with Policy Memo FD-150, Missouri will allow commercial entities, such as DoorDash, to provide home delivery services to CSFP participants. An agreement or contract must be in place between the company and the local agency which ensures that the delivery service adheres to all CSFP program regulations. The state agency will request approval from the USDA to verify any such agreements adhere to regulations and are complete.

12. COPIES OF AGREEMENTS, in accordance with 247.6 (c)(11): See Exhibit B for a copy of the Scope of Work used for all agreements and the sole source justification.