

**MISSOURI STATE PLAN  
AMENDMENT  
FOR FEDERAL FISCAL YEAR 2025**

**COMMODITY  
SUPPLEMENTAL  
FOOD PROGRAM**

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

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# **MISSOURI STATE PLAN**

## **COMMODITY SUPPLEMENTAL FOOD PROGRAM (CSFP)**

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

#### **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 for the general public. 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 six (6) Feeding America Food Banks in Missouri, referred to as local agencies in this document.

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

Currently, participants 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. Per the Final Access and Parity Rule published in October 2024, the State of Missouri will increase the Federal Poverty Income Guideline to the maximum income threshold of 150% permitted in the rule.

Federal Poverty Income Guidelines are implemented immediately upon receipt from the USDA by the state agency. The state agency immediately distributes the income guidelines to the local agencies with instructions for them to provide to distribution sites and to begin utilization immediately. 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).

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 or is a part of a federal or state program with income eligibility at or below that of Missouri CSFP; and
- (3) Has verified the participant wishes to continue to receive CSFP services.

Once an applicant is 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 as 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. Participants 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 information is self-declared and required on the Participant Application. 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 check a yes or no box to a question regarding if 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 Senior adults live in poverty in the service areas. For the 2025 calendar year, Missouri is requesting an increase in caseload of 275. Missouri's metropolitan areas of St. Louis and Kansas City struggle to meet caseload. It is assumed this is because the metropolitan areas have other avenues for resources for seniors. Missouri will not be requesting additional caseload for those areas. 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 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 Southeast area of the state had three (3) new agencies indicate a desire to provide CSFP to seniors. As this area of Missouri is very low-income, they also have several agencies with a large waitlist where some seniors could begin receiving a monthly distribution.

The local agency in the Southwest area of Missouri has one (1) new agency which indicated how they wanted to provide CSFP services in the area served. The local agency also wishes to move some individuals from waiting lists to assist them in meeting a new caseload increase.

In 2024, Missouri again contracted with Second Harvest in the Northwest to provide CSFP services in the area after not renewing a contract in 2020. Due to caseload limitations, Missouri CSFP could only provide Second Harvest with a beginning caseload of two-hundred fifty (250). With the limited caseload, Second Harvest is only able to provide distribution at 3 (three) locations. Second Harvest desires to add at least one (1) new site. As Missouri will be increasing CSFP income eligibility standards to 150%, this will create an increase in the number of income eligible participants across the state. A portion of the caseload request is to assist the additional individuals who will become income eligible.

Paris Brothers Delivery Delays:

Missouri was impacted by the delivery delays through Paris Brothers. Missouri was still able to provide full food packages for most months. However, due to the delays, the local agencies began sharing product to issue full packages. While this was beneficial, it also created additional work for local agency staff and the need for outside transportation services or the extra miles and expense of local agencies utilizing their own transportation vehicles and drivers. This also created needs for additional local agency vehicle maintenance not anticipated by the local agencies. The delays also created logistical situations where volunteer organizations had to be rescheduled due to the lack of product available for packing and for local agency staff to be available outside of normal business hours for potential deliveries.

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 (MDHSS) has developed an outreach flyer that is available on the Missouri CSFP webpage to promote and advertise CSFP to potential participants. Statewide press releases are issued through the Missouri Governor's Office as appropriate to highlight newsworthy program events.

Local agencies use the outreach flyer developed by MDHSS, or one developed by the local agency, 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.

Local agencies will be provided information which can be distributed through the outlets described above to provide information about the final rule now permitting an increase in income eligibility. It is anticipated this will assist in more seniors reaching out to local agencies and distribution sites for CSFP services.

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

USDA food products 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 food products; 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 participants 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) food product or other USDA foods for local use and distribution but must be inventoried separately. Inventory and distribution amounts as well as participant data are reported monthly.

Participants pick up food packages at the designated distribution site once each month during the distribution site's normal hours of operation. Staff or volunteers at the distribution site verify eligibility and identity of recipients or proxies prior to distributing the food packages.

Per the Final Access and Parity Rule and FD-158, permitting other methods of verifying identity of participants when receiving a food package, Missouri CSFP intends to allow participants to self-attest by stating their name.

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

Local agencies are responsible for making nutrition education available to all CSFP 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, other state agencies, etc. Senior nutrition information, as well as food safety and storage, is shared with local agencies for potential distribution with 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 distribution sites. Local agencies set specific radius or street boundaries for sites. Certifying officials review applications to determine the necessity for contacting another distribution site that could be within an applicant's or participant's proximity. If a participant is found to be obtaining CSFP at both sites, they notify the local agency, who notifies the state agency by email. The distribution site informs the participant they must choose one location. Per 7 CFR 247.20, the state agency may require the applicant or participant to be disqualified for up to one year, unless it would result in a serious health risk. Some distribution sites have a shared computer program, called Charity Tracker, which allows distribution sites to log in and determine if an individual is associated with another

distribution site. Rural sites are in constant communication with neighboring sites to detect dual participation. In addition, there is a yes/no question on the Participant Application applicants are to complete regarding whether the applicant or any qualifying household member participate in CSFP at another site.

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

The Missouri Department of Health and Senior Services (MDHSS) has established the following cost-effective claim standard: The pursuit of a claim against a participant to recover the value of USDA CSFP food improperly received or used is cost effective when the value exceeds \$300 or 6 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 7 CFR 247.30.

In situations where it is necessary to pursue a claim against a local agency due to food loss, 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.

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 participants. 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 participants are given priority over non-homebound participants when applications exceed the assigned caseload level. Local agencies allow designated proxies to pick up food packages for homebound participants.

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): copies of the Scope of Work (SOW) used for all contractual agreements and the sole source justification for contracting with the local agencies is provided.