

Module 5 CSFP Training: Administrative Reviews, Record Retention & Caseload Cycle

By: Texas Department of Agriculture



AGENDA



Administrative Review



Record Retention



Caseload Cycle



Questions

Administrative Reviews

7 CFR 247.34—The State must perform an on-site review of its CEs and storage facilities at least once every two years



Must review:
Certification procedures, nutrition education, civil rights, compliance, food storage practices, inventory controls, and financial management systems.

If deficiencies are identified during the review, corrective action procedures are in place to ensure CEs correct all areas that are out of compliance.



Administrative Reviews

CEs assume final administrative and financial responsibility for distributions of USDA Foods within their contracted service areas.



- Agree to be monitored by the USDA and TDA
- Review and monitor sites/subdistributing agencies to ensure program compliance



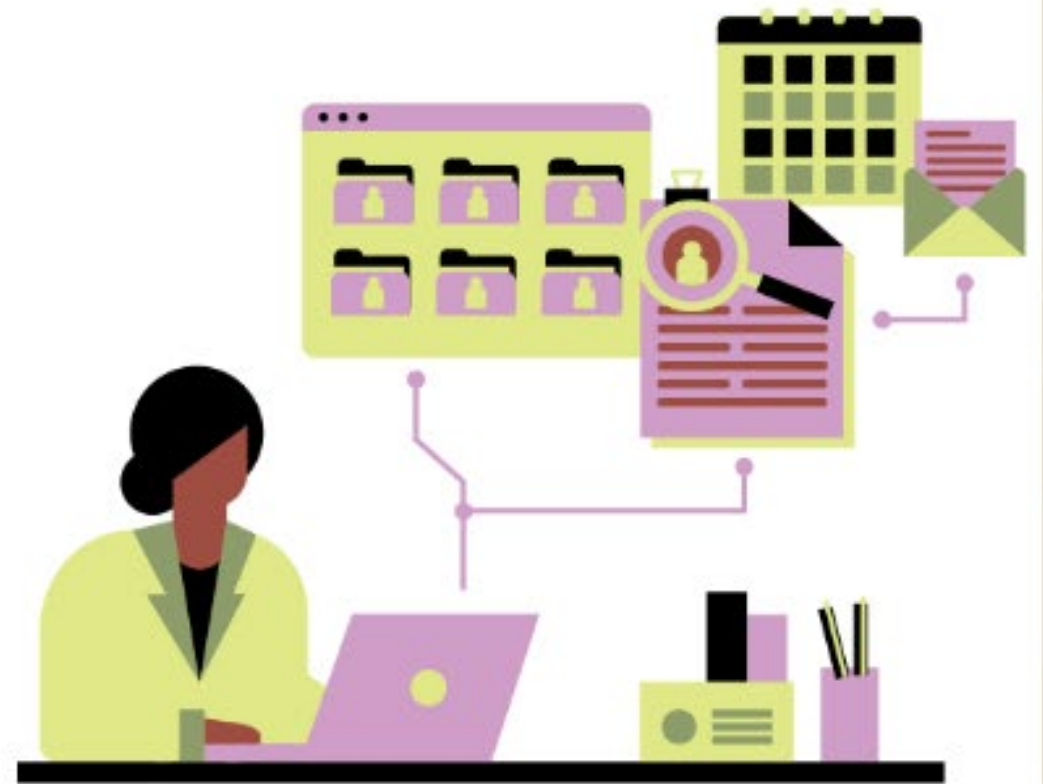
Administrative Reviews

Program Year: October - September

Months AR are conducted: January-April

* Note: only 1 distribution site per CE is reviewed

New CEs will be reviewed their first year.



Administrative Reviews

AR trainings/webinar are specific to CEs that will be reviewed in that current PY.

- Program Management will send electronic communication on AR & submission dates, one drive links , desk AR document, etc.

ARs consist of a two part review: Desk + Onsite

- Sections: Finance, Warehouse, & Programs
- Onsite: Sampling of finance invoices, physical inventory count of selected items and completed CSFP boxes/kitted boxes, records, posting, (1) distribution site visit, & review the CE's CSFP system, other.



Administrative Reviews

- **Entrance Conference**- Pre Meeting to go over AR schedule, desk AR questions. Occurs ~1 week before the onsite AR.
- **AR tool** - TDA completes AR document during desk + onsite AR
- **Exit Conference** - Post AR; occurs last day of onsite AR. Discuss findings, observations, best practices, Corrective action plans, other.

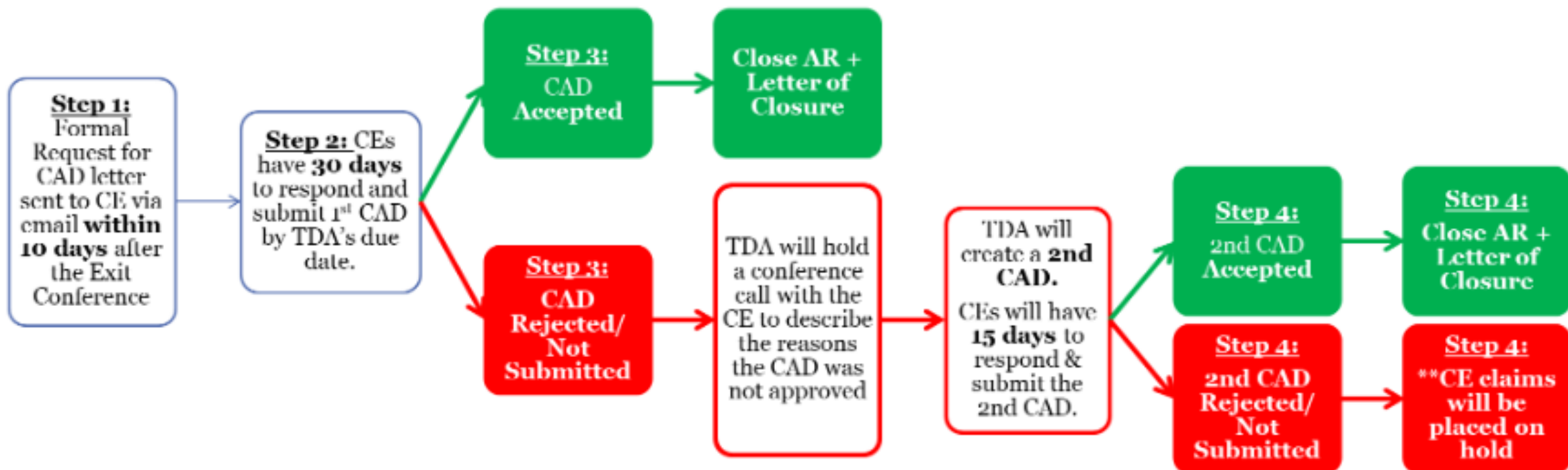


If findings/areas of noncompliance are identified during the AR:

- TDA has 10 days to submit the Corrective Action Document (CAD) in TXUNPS to CE
- CEs have 30 days to respond to each finding in the CAD
 - If first CAD is not accepted or turned in on time, 2nd CAD will be requested
 - **If 2nd CAD is not accepted/turned in on time, CE's administrative funds will be placed on hold.**



Administrative Review



CSFP Common Findings



Program Year 2023

Program Year 2024



Finding Number	Finding Question
100.01	Required posters (AJFA) are not being prominently displayed at the CE location. Participant Rights & Responsibility poster is an outdated version.
100.04	The nondiscrimination statement (NDS) is not included on all printed materials such as applications, pamphlets, forms or any other materials distributed to the public.
100.05	The CE's website does not have the updated nondiscrimination statement.
100.09	The CE does not have an adequate system for processing civil rights complaints. *Note: New process in handbooks.
100.15	The Race and Ethnicity categories are not correct on the CE's electronic/paper CSFP applications.

CSFP Common Findings



Program Year 2023

Program Year 2024



Finding Number	Finding Question
300.01	CEs do not have training logs for CR trainings or training logs missing name of trainer, date of training, location of training, training topics
3000.08	Site staff and volunteers that are handling client/applicant's personal information have not taken their annual Civil Rights training (long version).
3000.15	CSFP food boxes are not being stored in a safe space.
3000.28	The 30 CSFP Participant Applications (H1504) samples have missing information. CE's electronic application missing certification statement, NDS, ethnic/race categories, requiring additional information.
3000.29	Annual validations are not being completed correctly.
Other	Site records are unavailable during site visits/not within record retention timeframes

CSFP Common Findings



Program Year 2023

Program Year 2024



Finding Number	Finding Question
Other	CEs outreach materials/Nutrition Education: Contain more stringent regulations than TDA, requiring proof of address, age, income. Materials are not translated into Spanish.
Section 100	CE's website does not contain information about the CSFP; information is not up to date. Agency portal handbooks/forms are not updated.
Section 200- Caseload Management	Written Notifications and timeframes are not part of the CE's process
Section 200- Caseload Management	CEs are not certifying up to their caseload amount/over certifying CSFP applicants. Not utilizing the waiting list/temporary caseload correctly.

CSFP Common Findings



Program Year 2023

Program Year 2024



Finding Number	Finding Question
Section 500 Nutrition Education:	CEs do not have an SSI Referral to provide to seniors.
Section 500 Nutrition Education:	CEs are missing a Nutrition Education Plan, Survey, and/or Evaluation. Annually required.
Section 700- 800 Warehouse	Timely submissions of the FNS 153, CSFP Menu items not including cheese/incorrect guide rate used.
Section 700- 800 Warehouse	Sites that store CSFP boxes are not reporting it to the CE. CE is not reporting the inventory on the FNS 153. Inventory remaining at sites/CE level must be reported onto the FNS 153.

Administrative Review



Staff turnover is creating areas of non compliance throughout the CE's operations (inventory, program, & Finance).

- What is the CE's continuity plan?
- How to prevent reoccurring findings
- How to ensure processes are up to date
- How to implement cross training





Record Retention



Record Retention



Paper
Records



Electronic
Records

** Note: If audit findings, claims, litigation, or investigation findings have not been resolved, records must be retained beyond the required period until resolved.*

- CEs must maintain all documents relating to the CSFP for three years from the end of that federal fiscal year.
- Record Retention requirements also extend to the CE's CSFP sites.

Example:
Records/documents
specific to PY 24
must be retained
until September 30,
PY 27.

Records

All program records must be accessible to TDA and USDA upon request.



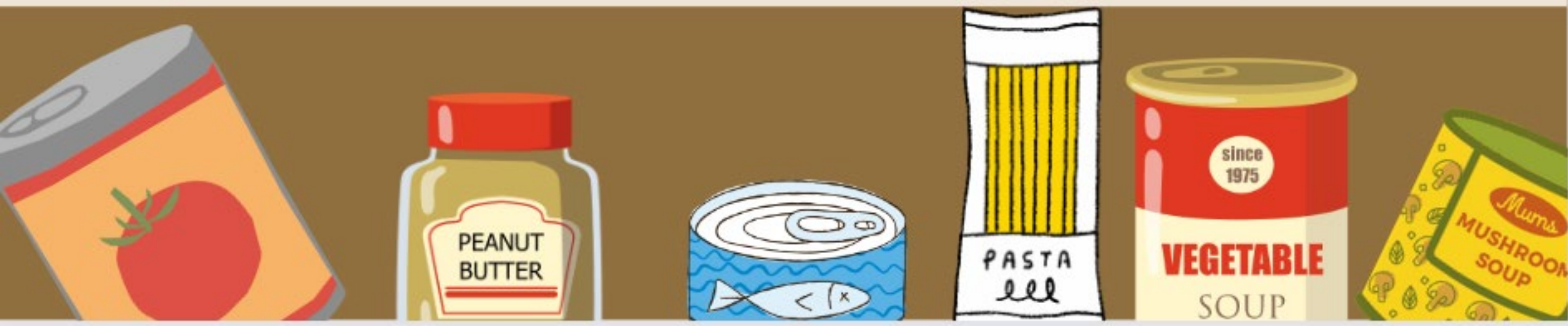
Record Retention



The following CSFP documents must be retained:

1. Claims for reimbursement and supporting documents
2. Eligibility determinations
3. Financial documents
4. Distribution receipts/invoices
5. Training documents/Civil Rights logs
6. Program and Civil Rights complaints
7. Procurement records
8. FNS-191 Reports
9. Other

Caseload Cycles



Caseload Cycles: Base Caseload

The State agency may not receive base caseload in excess of its total caseload assigned for the previous caseload cycle.

Base caseload is determined in the following manner:

States will receive a caseload equal to the highest of:

- Average monthly participation for the previous fiscal year; or
- Average monthly participation for the last quarter of the previous fiscal year; or
- Participation during September of the previous fiscal year, but only with an exemption
- October participation in the current fiscal year was equal to or greater than 95 percent of September participation in the previous fiscal year.



Caseload Cycle

State	New State/ITO in 2023? Y/N?	2023 Base Caseload	2023 Additional Caseload	2023 Final Caseload	Actual Program Participation by Month for Fiscal Year (FY) 2023												Anticipated Oct-23	A. Annual Average	B. Final Quarter Average	Highest of A & B	2024 Base Caseload*
					Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23					
Texas	N	69537	3726	73,263	70,363	70,187	69,147	69,996	71,623	73,118	72,927	73,039	73,755	72,545	72,978	73,548	73,593	71,936	73,024	73,024	73,024

Fields above will automatically calculate once 2023 caseload and monthly participation data are entered.

Your State's/ITO's Calculated Base Caseload*:

73,024 <=Field to the left will automatically calculate once data above is entered.

Base Caseload*:	73,024
Eligible for Additional Caseload?*	Yes
Additional Caseload Request	7,758
Total Caseload Requested:	80,782
Verification of Accuracy:	<input checked="" type="checkbox"/>

Caseload Cycles: Additional Caseload



To request additional caseload to increase CSFP program participation, TDA must:

- Have achieved a participation level which was equal to or greater than 95 percent of assigned caseload for the previous caseload cycle, based on the highest of:
 - a. Average monthly participation for the previous fiscal year; or
 - b. Average monthly participation for the last quarter of the previous fiscal year; or
 - c. Participation during September of the previous fiscal year, but only if exemption applies
- TDA will request additional caseload annually via the State Plan and submit it to USDA in November.
- CEs may request additional caseload throughout the year via
 - CSFP Contract Packet
 - Email Request

Caseload Cycle

If TDA receives/removes base and/or additional caseload from USDA:

- TDA allocates it to each CE based off previous years' performance (refer to logic key), CE requests, AR findings.

Logic Key	
Actual Participation/Issuance	Potential Caseload Changes
less than 80% of caseload	Possible caseload reduction / assign temp to another CE
80%-94.9% of caseload	Keep caseload consistent
95%- 100% of caseload	Keep caseload consistent- may assign base caseload, if available
<u>greater than 100% of caseload</u>	Potential base caseload increase, if available

Caseload Cycle



USDA provides base/additional caseload to each State by January/February.

TDA will allocate caseload accordingly and communicate it to each CE.

- Some CEs will not have any changes from previous PY

Goal is to reach 95%–100%

- CEs should not be going over 100%

There are various methods to ensure full caseload use. Several of these are the waitlist, temporary certification, and the use of proxies. Ensuring full use of caseload allows TDA to request additional caseload.

Caseload Cycle

Program Management Team assesses CE's Caseload Issuance/Participation regularly to ensure the State is meeting 95%-100% Caseload Issuance.

CEs that are below 90% or above 100% caseload will receive communication from TDA.

Corrective Action Plans will be implemented

PY24 CSFP CE Participation (Issuance)

				Q1			Q2			Q3			Q4			YTD			
				Oct-23	Nov-23	Dec-23	Q1	Jan-24	Feb-24	Mar-24	Q2	Apr-24	May-24	Jun-24	Q3	Jul-24	Aug-24	Sep-24	Q4
State Total	73,263	0	73,263	Total Participation	75,352	76,347	73,431	75,043	73,488			73,488						74,655	447,149
				Total % of Caseload	103%	104%	100%	102%	100%			100%						102%	
				Short/Over Caseload	2,089	3,084	168	1,780	225			225						1,392	

Caseload Cycle

Each new CSFP CE receives a minimum of 2,000 caseload = 2,000 seniors to be certified & will receive a box monthly. Once CE's reach their caseload allotment, they must wait list all other eligible applicants.



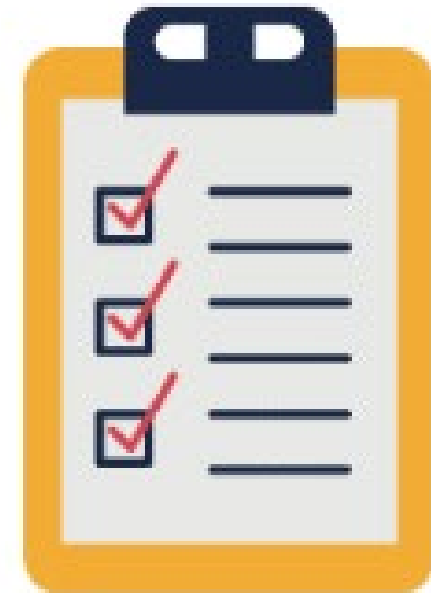
Caseload Cycle

- There are various methods to ensure full caseload use. Several of these are the waitlist, temporary certification, and the use of proxies.
 - Provide clear communication to seniors
 - Address challenges with food package pickup or home delivery
 - Serve up to your caseload allotment



Caseload Cycle: Wait List

- CEs may only certify an eligible applicant if a caseload slot is available for that applicant.
- The waitlist contains eligible applicants who are waiting for a caseload slot.
- When a caseload slot becomes available, the CE must certify a wait-listed applicant in the order they applied.



Caseload Cycle: Temporary Caseload

CEs may issue temporary monthly certifications to fully utilize caseload if a certified participant is unable to receive CSFP benefits.

The CE may provide a temporary certification period, not less than one month in length, to wait-listed applicants to receive temporary benefits.

TDA may request that CEs take some temporary caseload.

TDA will provide the length of the temporary caseload.

CEs must utilize their waitlisted applicants & complete the Temporary Certification Form, H1509 before providing them a CSFP box.

Example: TDA may request a CE to increase caseload temporarily to help compensate low performance at another CE.

The length of time needed for the temporary caseload increase is 4 months.

The CE grants a 4 month temporary certification period to participants from the waitlist rather than month-by-month.

*****CEs must consult with TDA prior to granting a temporary certification period for greater than six months.***



Questions



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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.

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Food and Nutrition Division
Commodity Supplemental Food Program



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