



State of Illinois
Illinois Department of Human Services

2024 TEFAP PROCEDURE MANUAL



Bureau of Adult Services
& Basic Support

Email: DHS.IEFP@Illinois.gov

The Emergency Food Assistance Program Procedure Manual

For participation in these Federal Grant Programs:

The Emergency Food Assistance Program (TEFAP)

&

Temporary Assistance for Needy Families (TANF)

Revised August 2023

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Section I

Definitions

Department of Human Services (IDHS): The state of Illinois agency that administers The Emergency Food Assistance Program for all contracted food banks and distribution sites.

Distribution Site: A location where the eligible recipient agency actually distributes commodities to needy persons for household consumption or serves prepared meals to needy persons.

The Emergency Food Assistance Program (TEFAP): The Emergency Food Assistance Program (TEFAP) is a federal program that helps supplement the diets of low-income Americans by providing them with emergency food assistance at no cost. In Illinois, IDHS administers TEFAP and partners with eight regional food banks to provide access to USDA foods.

Food Bank: A not-for-profit public or charitable institution or organization that maintains an established operation involving the provision of food or edible commodities, or the products of food or edible commodities, to food pantries, soup kitchens, homeless shelters, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to feed needy persons on a regular basis.

Food and Nutrition Service (FNS): Division of USDA responsible for the nationwide administration of numerous federal nutrition programs, including the Emergency Food Assistance Program.

Food Pantry: A public or private nonprofit organization that distributes food to low-income and unemployed households, including food from sources other than the Department of Agriculture, to relieve situations of emergency and distress.

Fiscal Year: A twelve-month period used for accounting and reporting purposes.

- **FFY:** The Federal Fiscal Year (FFY), from October 1st to September 30th.
- **SFY:** The State Fiscal Year (SFY), from July 1st to June 30th.

Homeless Shelter: A facility that provides temporary residence and at least one meal a day to homeless people for a period not to exceed 24 months.

Household: A group of related or non-related individuals living as one economic unit who buy and cook food together. It also means a single individual living alone.

Hungry Relief Tax Check-Off Program: Hunger Relief works to supplement the food distributed through the Emergency Food Program (TEFAP) and supports the Department's mission to provide an emergency response to hunger and to increase food security for low-income households and individuals residing in Illinois. Funding is made available through a designated fund in the State Treasury which allows Illinois residents to make voluntary contributions to the fund while filing their state income taxes. Funding for this program is limited and may not be available on an annual basis.

Soup Kitchen: A public or charitable institution that, as an integral part of the normal activities of the institution, maintains an established feeding operation to provide food to needy homeless persons on a regular basis.

Temporary Assistance for Needy Families (TANF): Federal funds awarded to purchase nutritional food items in bulk for distribution to food pantries who, in turn, distribute those food items to TANF-eligible households with at least one dependent member 18 years of age or younger.

United States Department of Agriculture (USDA): Cabinet level agency responsible for federal aspects of The Emergency Food Assistance Program as well as all other federal agriculture and nutrition programs.

Additional terms/definitions relating to TEFAP can be found at [7 CFR 250.2](#) and [7 CFR 251.3](#)

Section II

History

DISTRIBUTION BEGINS

Since the 1930s, the USDA has been buying farm products to stabilize and support farm commodity prices. By 1981, huge amounts of surplus food were still in storage around the United States and the warehousing costs were enormous. This massive amount of surplus USDA foods, combined with a large increase in the demand for emergency food by agencies serving the underprivileged, led to the establishment of a program to lower the amount of government-held commodities, reduce storage costs and help feed low-income households.

TEFAP ENACTED

Congress passed The Temporary Emergency Food Assistance Program (TEFAP) Act in May 1983 (Public Law 98-8). Later that same year, Congress revised and extended the program through September 1985. TEFAP has been extended or reauthorized several times since through the Food Security Act of 1985, the Urgent Relief for the Homeless Act of 1987, and the Hunger Prevention Act of 1988. Far-reaching program changes took place in the 1990 Farm Bill (PL 101- 624). That legislation not only extended the program through Federal Fiscal Year 1995 but also dropped the word 'Temporary' from the title. The Welfare Reform Act of 1996 built upon program growth and expansion by clarifying important regulations, broadening allowable uses of TEFAP administrative funds and reducing paperwork burdens. The current Farm Bill continues to authorize TEFAP and Federal Regulations governing TEFAP are found in 7 CFR, Part [250](#) and [251](#).

PURPOSE OF TEFAP

The Emergency Food Assistance Program (TEFAP) is a federal program that helps supplement the diets of people with low income by providing them with emergency food assistance at no cost. USDA provides 100% American-grown USDA Foods and administrative funds to states to operate TEFAP.

PURPOSE OF TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

The Temporary Assistance for Needy Families (TANF) food purchase program was created by the Personal Responsibility and Work Opportunity Act codified in 1996. TANF, in conjunction with TEFAP, provides an emergency response to hunger and increases food security for low-income households and individuals residing in Illinois. Temporary Assistance for Needy Families (TANF) funds are federal

funds awarded to the IL Department of Human Services by the U.S. Department of Health and Human Services. Based upon the availability of TANF funding, food banks purchase nutritional commodities in bulk for distribution to TEFAP contracted participating food pantries. Those pantries, in turn, distribute the commodities to TANF-eligible households with pregnant women and families with one or more dependent children.

Section III

Administration

FEDERAL ADMINISTRATION

The Emergency Food Assistance Program (TEFAP) is administered by the Food and Nutrition Service (FNS) of the United States Department of Agriculture. Temporary Assistance for Needy Families is administered by U.S. Department of Health and Human Services.

STATE ADMINISTRATION

The State of Illinois has designated IDHS as the State agency responsible for administration of TEFAP and TANF. Within IDHS, these programs are managed by the Bureau of Basic Supports, Division of Family and Community Services, Emergency Food Program. IDHS has partnered with eight with eight nonprofit, full-service food banks specializing in the storage, warehousing and distribution of large quantities of foods to serve Illinois neighbors.

CONTRACTS

IDHS contracts with food banks throughout the State to administer the local distribution of commodities. The food banks subcontract with food pantries, homeless shelters, and soup kitchens to distribute commodities to households and individuals. All providers agree to operate The Emergency Food Assistance Program in accordance with the requirements of [7 CFR Part 251](#), and, as applicable, [7 CFR Part 250](#). Prior to the initiation or renewal of any food bank contract, IDHS must verify through the Internal Revenue Service that the food bank is not present on the IRS Automatic Revocation of Exemption List. Food banks must also be in “Good Standing” with the Secretary of State’s Office. [7 CFR 251.5\(3\)](#)

Agreements between State agencies and eligible recipient agencies, and between eligible recipient agencies. [7 CFR 251.2\(c\)2](#)

Prior to making donated foods or administrative funds available, State agencies must enter into a written agreement with eligible recipient agencies to which they plan to distribute donated foods and/or administrative funds. State agencies must ensure that *eligible recipient agencies in turn enter into a written agreement with any eligible recipient agencies to which they plan to distribute donated foods and/or administrative funds before donated foods or administrative funds are transferred between any two eligible recipient agencies.* All agreements entered into must contain the information specified

in [paragraph \(d\)](#) of this section, and be considered permanent, with amendments to be made as necessary, except that agreements must specify that they may be terminated by either party upon 30 days' written notice. State agencies must ensure that eligible recipient agencies provide, on a timely basis, by amendment to the agreement, or other written documents incorporated into the agreement by reference if permitted under [paragraph \(d\)](#) of this section, any information on changes in program administration, including any changes resulting from amendments to Federal regulations or policy.

Contents of Agreements between State agencies and eligible recipient agencies and between eligible recipient agencies. [7 CFR 251.2\(d\)](#)

- Agreements between State agencies and eligible recipient agencies and between eligible recipient agencies must provide:
 - That eligible recipient agencies agree to operate the program in accordance with the requirements of this part.
 - The name and address of the eligible recipient agency receiving commodities and/or administrative funds under the agreement.

All food banks contracted by IDHS serve on the TEFAP Provider Forum. This body acts both as a program advisory committee to IDHS and as a working committee for program administration. Policies, procedures, and issues concerning the program are presented to the Provider Forum for discussion and recommendations. The group meets monthly, or as needed, and operates through a consensus methodology. Final program decisions are made by IDHS.

ALLOCATION OF USDA FOODS & FUNDING

USDA notifies IDHS when products are available and in what quantities. IDHS orders on a quarterly basis. According to federal rule [7 CFR Part 250.10 \(a\)](#); state that it must be ensured that USDA foods ordered by IDHS are the products distribution agencies need; and that the distribution sites provide annual input and that IDHS use a request driven ordering system. Due to unforeseen circumstances, USDA may occasionally eliminate or substitute products.

IDHS allocates product for direct shipping to food banks by applying a formula to the total dollar amount available for purchase of product each month. The formula is weighted 60% for the poverty population in the food bank's geographic service area and 40% for the unemployment population relative to state totals. To determine the quantity of product allocated to the food banks each month, the following steps are taken:

1. The entitlement of each food bank to USDA Foods is determined by a weighted formula of 60% for the number of poverty households and 40% for the unemployed individuals in each county.
2. The amount and value of commodities each food bank receives from direct shipments and state shipments are tracked and reconciled as closely as possible to assure that each food bank receives its fair share of commodities as established by the 60/40 formula.

MONITORING

USDA requires monitoring of food banks and distribution sites participating in TEFAP. Any food bank or distribution site participating in TEFAP must allow access to program records and operations by IDHS, USDA or other authorized governmental agents. The purpose of the monitoring process is to evaluate program operations, review record-keeping procedures and provide technical assistance for program improvement. IDHS employs a risk-based selection process for the monitoring of food banks and distribution sites at least once every four years (approximately 25% of distribution sites annually).

- Food bank monitoring is based upon the number and significance of findings from the prior monitoring visit to determine the need for monitoring in the next cycle.
- Distribution site monitoring considers the pounds of food received on an annual basis, the number of findings from the prior visit, and the length of time since the prior visit.
- Food banks are required to monitor all distribution sites that have signed contracts with them at least once every two years. – *State Plan: Section VI. Program Monitoring*

- **Monitoring Example:**

Year 1	Year 2	Year 3	Year 4
SFY 24 – Sites A,B,C	SFY 25 – Sites X,Y,Z	SFY 26 Sites - A,B,C	SFY 27 Sites – X,Y,Z

- A simple way to remember this would be to monitor one set of sites on even numbered years, and the remaining set of sites on odd numbered years.
- USDA has no regular monitoring schedule but may visit any food bank or distribution site at any time.

MONITORING OF DISTRIBUTION SITES

On or before the start of each state fiscal year, IDHS will share with the food banks the distribution sites that IDHS will monitor in that fiscal year. The actual on-site reviews of distribution sites by IDHS are unannounced. The food bank should make its site volunteers aware of this policy and instruct them to provide access to records and facilities to TEFAP monitoring staff.

The following items are checked during the compliance review of distribution sites:

- eligibility requirements are being followed
- proper storage of food
- required Signature Sheets [[Exhibit B & C](#)]
- Proxy Forms are properly completed [[Exhibit G & H](#)]

- sanitary conditions are maintained
- required posters are in place
- storage temperatures are maintained
- entrance(s) marked and days and hours of operation are clearly posted
- all other contractual obligations are being met

Monitoring reports for distribution sites are completed and issued to the food bank via an on-line system accessible through the web at www.illinoisfoodbanks.org/login.asp. Instructions for online monitoring reporting are provided below:

DISTRIBUTION SITE MONITORING REPORTS

After an IDHS monitor visits a distribution site, the monitor will record the visit on the Illinois food banks website. An email will be sent to the designated staff at the food bank notifying the recipient of the date of the monitoring visit, the contact person, the site, and the findings identified. If there are no findings the visit will be noted as “CLOSED” and no action is required. If there are findings, the food bank will have 30 days to respond with corrective action.

Once the corrective actions are implemented, the food bank must enter the corrective action on the website by logging onto www.illinoisfoodbanks.org/login.asp, and follow the following steps:

1. Click on the ‘Data Entry’ dropdown box and click ‘TEFAP Monitoring’.
2. Select the correct State Fiscal Year and click the ‘View Visits’ button. The screen will list a table of site visits. The visits listed near the top are ‘OPEN’ visits, and those listed near the bottom are “CLOSED’ visits. A ‘CLOSED’ visit has either been closed by the IDHS monitor due to no findings or closed when the monitor has accepted the corrective actions.
3. To enter your corrective action(s) click the ‘Update Action’ button next to the site visit you wish to update. When open you may read the findings and enter corrective actions or comments in the ‘Corrective Action’ text box.
4. Click the ‘Submit Updates’ button to complete your corrective action.

IMPORTANT

***When the ‘Submit Updates’ button an email will automatically be sent to IDHS and your email recipient list notifying of the update completed. If you do not wish to submit an update that will generate an email, click the ‘Cancel’ button.

Food banks are required to respond via the www.illinoisfoodbanks.org/login.asp website for all corrective actions within 30 days of receiving the email notice.

A preliminary monitoring report of the visit to the food bank may include a list of findings and a requirement that the food bank submit a corrective action plan in response to each finding. The food bank must respond to IDHS's preliminary report within 30 days of issuance and submit a corrective action plan responding to each of IDHS's findings. IDHS will review the corrective actions. Once approved, the food bank's actions are incorporated into a final report issued to the food bank by IDHS. The food bank must, after acknowledging receipt of final report, implement its corrective action plans.

The monitoring review will cover the following areas:

- Public outreach activities for distribution sites
- Self-declaration of eligibility
- Site selection process
- Adequacy of coverage for geographic area
- Food bank monitoring of distribution sites
- Product accounting
- Allocation procedures
- Storage and warehousing practices
- Inventory controls
- Expenditure data
- Complaint procedures
- Delivery to distribution sites
- Anti-discrimination policy
- Other contractual and administrative requirements

IDHS RECALL PROCEDURE

In the event that a USDA commodity recall is implemented, IDHS staff will be notified according to the recall table below.

- Identifying the roles of IDHS TEFAP staff to recognize a recall and begin the process outlined in the procedure. (See IDHS TEFAP contacts below.)
- Communications strategy is to contact the ERAs as well as IDHS TEFAP staff and IDHS management to disseminate USDA guidance as it is provided.
- Determination of the loss impact to all ERAs and the action to be taken due to the recall.
- Monitor all activities impacting ERAs by creating a record of the incident to include all parties participating in the recall, food amounts and food replacement costs as well as the administrative costs involved to accommodate the restocking.
- Schedule an annual review that documents the procedures were reviewed and updated by assigned staff.

- Create an email account to receive notices accessible by assigned staff and rotate assigned staff monitoring.
- Require, at minimum, one (1) merit compensation staff member to carry a state issued cell phone to monitor evenings and weekends.

Name	Recall Function	Phone	Email
Tal Vanek	Food Assistance Program Manager	217-622-2683	Tallett.Vaneck@illinois.gov
Beatris Gonzalez	Bureau Chief	773-771-5367	Beatris.Gonzalez@illinois.gov
Lisa Flynn	Executive II	217-361-6731	Lisa.Flynn@illinois.gov
Britt Jurgens	Program Coordinator E-II	217-280-3229	Britt.Jurgens@illinois.gov
Charles Banning	Technical Service Coordinator E-II	217-280-3320	Charles.Banning@illinois.gov
Britney Southard	Office Coordinator	217-725-6723	Britney.Southard@illinois.gov

The general email for the IDHS-TEFAP office is: DHS.IEFP@illinois.gov.

Section IV

Food Bank Responsibilities

Food banks contracted by IDHS Emergency Food Program (TEFAP) vary in size and scope of operation, but they are all required to meet certain obligations.

SELECTING DISTRIBUTION SITES

Food banks must develop an application system by which local public agencies or private non-profit organizations can apply for participation as a distribution site. When selecting distribution sites, food banks must consider the following criteria:

- the needs of the area where the potential site is located
- proximity of other sites operating in the same area
- willingness to serve all eligible persons in need of food
- capability to properly store and distribute donated food
- ability to maintain the proper records
- ability to provide privately donated food for distribution
- hours and days of proposed operation
- ability to follow TEFAP policies and procedures

CONTRACT WITH DISTRIBUTION SITES

The contract [[Exhibit A](#)] between the distribution site and the food bank is provided by IDHS. Contracts distinguish the site as either a soup kitchen or food pantry, but all sites participating in the TEFAP are held to the same basic requirements. Homeless shelters with congregate feeding are considered to be soup kitchens for contract and program purposes.

The effective dates of the contract coincide with the State Fiscal Year (SFY), July 1 to June 30, and must be renewed annually. By signing a contract with a food bank, the distribution site certifies that

it is a public agency or a private non-profit organization. Food banks must keep proof of 501(c) tax-exempt status for contracted sites on file. IDHS reserves the right to exclude any distribution site from participating in the TEFAP.

Prior to the initiation or renewal of any TEFAP distribution site contract, the food bank must verify that the site is not present on the IRS Automatic Revocation of Exemption List.

DELIVERY AND PICK-UP OF COMMODITIES

Food banks must maintain a warehouse where commodities are held until product is delivered or picked up. A food bank may choose to deliver the commodities from its central warehouse to all contracted distribution sites. In many instances, a combination of distribution methods is used.

Food banks must specify their method of distribution in the proposal submitted to IDHS for funding. TEFAP proposal review criteria favor organizations that deliver directly to sites, particularly in outlying areas. IDHS encourages food banks to expand their delivery services whenever possible. A decrease from delivery activities specified in the proposal may be regarded as a contract violation.

MAINTAIN SCHEDULE OF OPERATING HOURS

Each food bank must maintain an accurate and up-to-date list of all distribution sites that receive its USDA Foods. Food banks must report distribution site information via the on-line website www.illinoisfoodbanks.org/login.asp.

The information must include:

- Food bank name
- Site name
- Distribution Site address
- Contact person, telephone number, and email address
- Scheduled days and hours of operation
- Web address if available
- Notes

Homeless shelters that do not serve meals to the general public should not list hours of operation. The notation on the site list should indicate that the food program serves only residents of the homeless shelter. Food pantries operated by homeless shelters should have hours of operation listed and must serve the general public. Instructions to report distribution site information is provided below.

ON-LINE INSTRUCTIONS FOR DISTRIBUTION SITE LIST

To enter data, edit, or delete data for distribution sites follow the instructions listed below:

Using members link of www.illinoisfoodbanks.org/login.asp, login to the website.

1. In the 'Data Entry' dropdown box, choose 'Dist. Sites'. The new page will contain your current distribution site list.
2. To add a new distribution site, click the 'Add Site' button.
3. Enter the information about the new site and click the 'Update Record' button. This will enter the site into the database and take you back to your current distribution site list. Clicking the 'Cancel' button will also take you back to your current distribution site list but will not add the new site information.
4. To edit a current distribution site, scroll down the page until you see the site you wish to edit. The sites are listed in alphabetic order.
5. Click the 'Edit Site' button to the left of the desired site.
6. In the new page, edit the information as needed.
7. Click 'Update Record' when finished. This will enter the edited information into the database and take you back to your current distribution site list. Clicking the 'Cancel' button will also take you back to your current distribution site list but will not update the database with the edited site information.
8. To delete a distribution site, follow the instructions to edit a distribution site except instead of clicking 'Update Record', you will click the 'Delete Record' button. After clicking this button, you will see a confirmation dialog box. Click 'ok' in the box to proceed with the deletion.

ALLOCATION METHODS

The plan for allocating commodities to sites is subject to IDHS review. Food banks must adhere to the IDHS allocations for each county. The purpose of formal allocation procedures is to implement a fair share system at all levels. When the food bank receives its allocation notice from IDHS, it must decide what amounts and varieties will be allocated to its distribution sites when there is more than one site within a county.

A food bank may use service data in developing its allocation plan for multiple sites within a county. E.g., if one site in Sangamon County has a large population which has a religious restriction on eating pork, the regional food bank can then minimize that site's pork allocation and then allocate a larger portion of pork to another site (as long as both are within Sangamon County). This method is optional but allows for a more targeted approach for distribution.

The following allocation methods may be employed:

ALLOCATION BY COUNTY

- Based upon objective statistical and service data to monthly distribution totals of each commodity.
- County allocations must be based upon the percentages provided by Emergency Food Program (TEFAP) at the beginning of each fiscal year.
- The percentages for each county reflect the county's pro rata share of the State total of 60% of persons in poverty and 40% of persons who are unemployed. (State Plan: Section VII part D)

ALLOCATION BY SITES WITHIN A COUNTY

- Based upon service data
- Number of persons served in food pantries and the number of meals served in soup kitchens is used to establish site allocations within each county
- To convert soup kitchen/shelter meals to individuals served by food pantries, divide the number of meals served by 12
- The result of this calculation is then used to establish each site's pro rata share of the county's USDA Foods

ALLOCATION BY SERVICE DATA BY SITE WITHIN A COUNTY

- Convert all service data to the number of individuals served
- Add the number of individuals served by each food pantry from the Signature Sheets [[Exhibit B & C](#)] and for soup kitchens/shelters, divide the total number of meals by the number of days of operation per month
- Divide the result by the number of feeding periods each day; the results equal the number of persons served in soup kitchens/shelters
- These calculations are used to establish each site's pro rata share of the county's USDA Foods.

ALLOCATION BY ANNUAL RECONCILIATION

- Reconcile USDA food commodity receipts, allocations, and distributions over a 12-month period
- Each distribution site must receive its fair share of the county total over the course of a year
- IDHS review of a 12-month fair share system based on cases, not value of product, must consider the issue of parity between values of receipts by sites

ALLOCATION REDUCTION

Reduction of monthly food allocation may be requested by some distribution sites. To ensure adherence to fair share allocations for all food commodities made available by USDA and to alleviate chronic problems in the site allocation process, the policy below must be adhered to when addressing USDA food allocation reductions:

- overall allocation can be reduced by a percentage factor:
 - distribution site staff cannot select some products while rejecting other products
 - distribution site staff cannot decide to not pick-up their allocations
 - distribution site staff must pick-up in a timely manner
- request for reduction must be done so in writing specifying:
 - why the reduction is being requested
 - indicating the percentage of reduction needed
- request for reduction may be on a month-to-month basis, if permitted by the food bank; but may not exceed one year
- request(s) must be kept on file by the food bank
- commodities must be re-allocated to sites within that geographic service area

CONDUCTING PUBLIC OUTREACH

It is the responsibility of the food bank to conduct appropriate outreach activities within its service area including publication of each site's name, address, and days and hours of operation. Posters, pamphlets, public service announcements, social media, and newsletters or placing notices in local newspapers will make potential recipients aware of the availability of donated food. Word of mouth is never acceptable as the sole or primary method of public outreach.

RECEIVING COMMODITY SHIPMENTS

Accurate accounting for USDA Foods will be impossible for food banks if the inventory process is not strictly controlled from the very beginning.

- Counting and inspecting all commodities upon arrival is basic to inventory control.
- Every delivery should be checked for possible shortages or damage before the product is accepted.

- Food banks should not accept damaged product or sign a Bill of Lading until the food bank count aligns with the number stated on the Bill of Lading.
 - After the Bill of Lading is signed, title is transferred to the food bank
 - By signing, the food bank assumes liability and will be held financially responsible for the amount of product shown on the Bill of Lading.

Every day a food bank receives USDA Foods, the food bank must complete the online Commodity Receipt form per the online Commodity Receipt Reporting instructions; **refer to Section 10 (Service Data Reporting)**. The Commodity Receipt must be submitted to IDHS “immediately” for State-level processing. A copy of the Commodity Receipt and the BOL must be kept for 5 years by the food bank.

THE MONITORING OF DISTRIBUTION SITES BY FOOD BANKS

USDA requires the monitoring of all contracted TEFAP distribution sites. All distribution sites must allow IDHS, USDA or other authorized governmental agents access to program records and operations. Food banks are responsible for visiting all TEFAP contracted distribution sites at least once every two years and provide IDHS TEFAP Manager with a monitoring schedule each State Fiscal Year. A written monitoring report must be completed and maintained on file. Food bank monitoring of distribution sites must include, but is not limited to, the following:

- adherence to eligibility guidelines
- food storage procedures
- appropriate commodity inventory management
- Signature Sheets by customers (food pantries only)
- required posters in plain view of customers
- maintenance of sanitary conditions
- food pantry weekly minimum operation (2 hours)
- verification that the distribution site is not found on the IRS Automatic Revocation of Exemption List

PROVIDING TRAINING AND TECHNICAL ASSISTANCE

Food banks are required to provide training and technical assistance to distribution site staff on a periodic basis. This training must include procedures outlined in the IDHS TEFAP Food Pantry, Soup Kitchen, and Homeless Shelter Manual which includes, but is not limited to, the following:

- required posters
- receiving USDA Foods
- eligibility guidelines
- storage and handling of donated foods
- reports and record keeping
- Civil Rights and non-discrimination including:
 - the latest Non-Discrimination Statement
 - phone number, address, and email for the submission of complaints
 - requirements to reach out to under-represented communities
 - display “And Justice for All” poster
 - reduce language barriers
 - provide written notice and referral for all faith based or religious organizations
- political activity prohibition
- maintaining sanitary conditions; pest control
- procedures for federally funded equipment (refrigerators/freezers)

Section V

Storage and Handling

INSURANCE COVERAGE FOR USDA FOODS

Should a loss occur due to fire, theft, damage or other causes, liability is assigned to the food bank in the contract with IDHS. Per [7 CFR 250.12\(d\)](#), the distributing agency must obtain insurance to protect the value of donated foods at its storage facilities. The amount of such insurance must be at least equal to the average monthly value of donated food inventories at such facilities in the previous fiscal year. The distributing agency must also ensure that the following entities obtain insurance to protect the value of their donated food inventories, in the same amount required of the distributing agency. The cost of this required insurance is an allowable expense under TEFAP Grant.

Food banks must provide proof of insurance coverage annually or upon request during monitoring, and upon policy renewal. Although USDA provides commodities without cost, there is a value assigned to each product that includes USDA's cost of purchasing, processing, and distribution of the commodity to the States. For current commodity values please contact IDHS.

FOOD STORAGE

Food storage areas should provide protection from weather, fire, theft and pests. Aisles between pallets should be wide enough to provide easy access for inspection, inventory and pulling of product. All USDA Foods are to be stored at the food bank or at a storage facility contracted by the food bank. Food banks and their distribution sites must follow good warehouse and storage practices, including but not limited to:

- Keep food 6" off of the floor; store on pallets, platforms or shelves.
- Keep food away from walls. This will permit good air circulation and allow for pest control.
- Keep non-food items separate from food. *Toxic items (soap, bleach, cleaning supplies) should be kept away from food items.*
- Keep floors, pallets and shelving clean.
- Keep doors, windows and roofs well sealed to prevent pest entry and water damage.

Maintain a good pest control system. Have a qualified person on staff or contract with a licensed firm to handle pest control management.

Maintain equipment. Regularly check for leaky compressors in freezer and refrigeration units, forklift hydraulic leaks, etc.

Keep thermometers in the freezer, refrigeration units and dry storage areas.

DRY COMMODITIES

- Store in a cool dry place away from direct sunlight
- Minimum of 6 inches off the floor
- 4 inches away from walls
- Two-foot ceiling clearance to avoid high temperatures at the ceiling
- Storage area must be clean, secure and inspected regularly

REFRIGERATED COMMODITIES

- temperatures between 35° F to 40° F
- allow for proper air circulation
- refrigeration unit that is cleaned and inspected on a regular basis

FROZEN COMMODITIES

- freeze at a temperature registering -10° F to 0° F or lower
- allowing for proper air circulation
- store in a freezer unit that is cleaned and inspected on a regular basis

STACKING COMMODITIES

- Limit the height of the stack so cases of food on the bottom layers will not be crushed
- Cross-stack cases on pallets to ensure the stack will be sturdy and solid and will not tip when being moved.
- Shrink-wrapping provides added stability
- Stack cases away from potential damage by heat, steam, or water.

MAINTENANCE OF STORAGE AREAS

An ongoing system of pest control is required. Rodent controls such as traps and glue boards are recommended. Place traps along walls and near doorways, moving the traps monthly. Poisons must not be used except by a licensed professional. Prevention of rodent infestation by thorough cleaning and maintenance of the warehouse is the best policy.

A cleaning schedule must be established listing the necessary frequency of cleaning for each location. Floors, including under pallets, should be swept and mopped at least monthly. Floors in high traffic areas require regular cleaning. Areas soiled by spillage or breakage must be cleaned immediately. Broken pallets should be discarded and dirty pallets cleaned. Empty pallets should be stored apart from food products.

Maintenance of the exterior of the warehouse must not be overlooked. The building and grounds should be inspected regularly for signs of fire hazard, pest infestation, security problems and areas in need of repair. Garbage, waste or rubbish must be disposed of frequently and not allowed to become nesting areas for pests.

ROTATING STOCK

Food banks are required to complete physical inventories to ensure that all USDA Foods are being distributed within a reasonable time frame and to report any loss, damage or commodities kept longer than 6 months. To help assure the quality and freshness of USDA Foods, the practice of First In/First Out (FI/FO) must be followed. Food must be stored so cases with the oldest pack dates are used first. All USDA Foods have the pack date on the cases. Pack dates or lot numbers are also printed, stamped or embossed on individual cans or containers.

INVENTORY LEVELS & DISTRIBUTION TIME FRAME

Inventory levels must be routinely assessed by the food bank staff to assure that supplies are reasonable and being **distributed within six (6) month time frame**. The distribution of USDA food commodities within the six (6) month time frame is a federal requirement and every food bank must be in compliance. Non-compliance can cause an automatic reduction in the Fair Share Allocation formula.

A physical inventory of all USDA Foods is mandatory once per month to reconcile against book inventory. A report must be submitted showing all USDA Foods in-stock and their corresponding receipt date.

OUT-OF-CONDITION PRODUCT

Out-of-condition products are those commodities that appear to have come from the packer contaminated, deteriorated, spoiled, infested, or having latent defects. All commodities must be inspected upon receipt. Bulging cans, cans with sharp dents and rust on the seams are examples

of out-of-condition products. Finding foreign matter such as glass or metal in a product requires immediate attention/resolution.

All out-of-condition losses must be reported to IDHS by phone immediately. If a customer complains about a product, the agency must adhere by the Commodity Complaint process as described in [7 CFR 250.15\(d\)](#) the improved protocol for gathering product acceptability and quality information. You can find this form on the website www.illinoisfoodbanks.org/login.asp, go to user administration and click on the “Forms link” to locate the form. The IDHS Complaint Form

[\[Exhibit K\]](#) must be completed and promptly submitted to IDHS. Also, the Report of Out-of-

Condition product must be completed [\[Exhibit D\]](#) and include as much information as possible concerning the product that can be gathered such as lot numbers, can codes and packing dates. Do not dispose of any out-of-condition commodities until advised to do so by IDHS. In some instances, USDA will require samples of the out-of-condition product. When conditions present a health hazard to food stored nearby, (exploding cans, infestation of grain products, etc.) the out- of-condition product must be isolated.

As IDHS becomes aware of potential health hazards, food banks will be notified promptly. A hold will be placed on the commodity in question until it is determined safe to continue distribution. If the commodity involved is found unsafe, IDHS will issue instructions for its disposal.

If product appears to be damaged or spoiled, the local public health department should be contacted immediately to conduct an inspection. If product is determined hazardous, IDHS will order it to be disposed of after the spoiled product is first made inedible by pouring bleach on the contaminated food. For larger quantities, consult state or local public health officials for guidance. For additional information about warehousing food, contact your county or local health department.

RE-PACKAGING PROHIBITED

**USDA Foods may NOT be re-packaged.

USDA WAREHOUSING STANDARDS

PERISHABLE FOOD PRODUCTS, CHILLED, AND FROZEN STORAGE

All chilled and frozen food products are highly perishable and subject to rapid deterioration when improperly stored. Lack of proper temperature, humidity, air circulation and sanitation will result in rapid spoilage and eventual loss of product. Microorganisms, particularly certain species of bacteria and fungi, cause most spoilage of chilled and frozen food products. Contamination spreads rapidly. Frequent inspections followed by sorting and removal of the decayed items, will keep losses to a minimum.

Upon receipt, food products should be separated and date-stamped so that the oldest food products are issued first. Occasionally, regardless of the date stamped, it may become necessary to issue some food products quickly to avoid loss by spillage. Older chilled or frozen food products should not be allowed to accumulate in storage rooms. Frozen products should not be accepted in a partially thawed condition, nor should such products be refrozen after having been thawed.

TEMPERATURE

The storage temperature for all frozen products should be below 0° F. During transport the temperature should not be higher than 10 F. Temperatures for chilled storage (refrigerated) should be kept between 35° F to 40° F. Dry storage areas should be kept between 35° F to 75° F. There must be thermometers in all frozen and chilled storage areas. Dry storage areas should be routinely gauged for temperature control.

HUMIDITY

Humidity within all storage areas must be controlled to prevent rapid deterioration in the quality of foods. Microorganisms require adequate moisture to grow and multiply. Yeast, mold, and/or bacteria grow in a specific humidity range. There is less bacteria and enzyme action at lower temperatures and humidity. High humidity is detrimental to stored food products by accelerating the growth of bacteria and molds, promoting insect infestation, and causing mustiness in flour, rice, and similar foods. High humidity causes products, which readily absorb moisture, such as sugar and salt, to cake and become hard. Humidity ranges represent the ranges which best inhibit the gain or loss of moisture in the item. Storage at higher relative humidity may allow water to condense on or be absorbed into the item, while at lower relative humidity the item may dry or shrink.

AIR CIRCULATION

Air circulation is an important factor in the proper storage of food products. Products should be stacked on pallets, which will provide a 4-inch wall clearance, 2-foot ceiling clearance, and sufficient working aisle space.

FOOD QUALITY

Average storage periods for frozen items assume that products when delivered to the government were procured and processed meeting specifications and were in good condition when transported from warehouse to program recipients.

PACKAGING

The nature and condition of the commodity packages are important factors, which influence storage life expectancy. Packaging materials should be moisture and vapor proof to prevent dehydration, discoloration, odor absorption, loss of flavor, and oxidation. Crushed or torn packaging detracts from the quality and appearance of stored product. All donated products should be presentable before storing or distributing.

DETECTION OF DETERIORATION

Deterioration due to time in storage and variations in temperatures can be detected by periodic inspection. Look for such defects as dehydration (freezer burn), undue softness or mealy texture, discoloration, off odor, evidence of weeping, evidence of rancidity and/or mold.

SEMI-PERISHABLE FOOD PRODUCTS IN DRY STORAGE

The term semi-perishable food products refer to food items that are canned, dried, dehydrated or otherwise processed to the extent that such items may, under normal conditions, be stored in non-refrigerated spaces. Semi-perishable food products should not be regarded as non-perishable food products, which do not require care or protection in storage. While semi-perishable food products are not nearly as susceptible to spoilage as perishable food products, spoilage can and will occur if the products are mishandled, improperly stored, or stored for excessive periods of time. It is important to remember that the length of storage should be based on the pack date and not on the date of receipt.

STORAGE

Careful, correct storage methods not only prevent damage to items in storage but also assure speed and efficiency in the receipt, handling and issue of items. As in chilled and frozen food products, semi-perishable food products should be separated and date-stamped so that the oldest food products, as packed and not as received, are issued first. The method used for storing each item depends on the nature of the container, the nature of the commodity, and the bursting or breaking strength of the bottom layers. Food products on hand, stored beyond the recommended storage period, should be inspected carefully for spillage, bulging, leakage, or other damage. If in good condition, they should be issued immediately for consumption.

PRECAUTIONS STORAGE

Items should not be stacked to a height that would cause bursting or crushing of the bottom layers. Stacking in close proximity to steam or other heated pipes should be avoided. Pallets should be used to raise food products off the floor and individual lots piled to permit the circulation of air around the lots.

Bagged items and those requiring fumigation and insect control should not be stored in large masses in corners of the storeroom or directly against the walls, leaving insufficient room for cleaning and inspection. Palletized storage is used to facilitate handling of the food products and reduce loss by breakage. All items should be properly cross stacked to keep the stack solid and prevent it from toppling.

CAUSES OF SPOILAGE

All food products are subject to varying degrees of natural deterioration. This deterioration is inherent in the food itself and should not be confused with the action of microorganisms, chemical agents or other outside agents. The basic principle of storage is first-in/first-out (FI/FO). The oldest lot(s) determined by pack date not delivery date, should always be used first.

Insects: Roaches, Flies, Weevils, and Moths

Insects can cause great damage to stored food and may attack both raw and processed food. Food stored at temperatures between 60 to 90 degrees F is especially attractive to insects. Infested supplies must be segregated, inspected, documented, and destroyed.

Cornmeal is particularly susceptible to insect infestation and rancidity. Roaches and flies not only

contaminate the foods but spread disease. Regularly scheduled pest extermination should be performed with strict adherence to regulatory rules and state laws.

Rodents: Rats and Mice

Rodents not only physically destroy food by feeding, chewing, and cutting the bags for nests or nesting material, but also contaminate food with their excrement and hairs. Rodents are carriers of filth and disease; therefore, controlling these pests is important. The most effective method of control is to prevent entry of these animals.

Freezing

Canned, dehydrated or low moisture foods may undergo accidental freezing if stored in warehouses where temperature controls fail during winter months in cold climates.

Freezing usually does not harm these products. If foods containing large amounts of water, such as canned products, are frozen, their usefulness and palatability probably have not been harmed. However, the physical appearance may suffer due to change in consistency and texture (softening).

Cheese and butter may separate when frozen, but the food is not spoiled. Dry products such as grain, flour, sugar, cereals, and dehydrated foods are generally stored in non-refrigerated areas but can be stored in refrigerated areas if humidity can be maintained at 50% to 60%. Increased humidity may cause caking.

Temperature

A high temperature over long periods of time is detrimental to the safekeeping of almost all food products. High storage temperatures encourage bacterial growth, mold growth, and insect infestation and are particularly dangerous when accompanied by high humidity.

Chemical action is accelerated causing rancidity in many items. Action of the food acids, naturally present within the cans, is accelerated resulting in pin holing, blackening of the interior and hydrogen swells. Flour and associated products (barley, cereals, cornmeal, cornstarch, crackers and biscuits, hominy, noodles, oats, rice spaghetti and macaroni, tapioca, and uncooked wheat) are subject to insect infestation particularly at high temperatures.

Flour and cereals will absorb odors and should be kept away from materials giving off distinctive odors.

Ventilation

Where sharply fluctuating temperatures and high humidity prevail, the lack of proper ventilation may cause excessively high temperatures. Proper ventilation is one of the most important factors in protecting foods. In some cases, it may be necessary to open doors and use fans to induce circulation.

Light

Damage from light is restricted to products that are packed in glass or transparent containers. Exposure causes color changes and may affect the flavor of foods containing oils and fats.

Storage Temperatures and Relative Humidity for CERTAIN food products

Product	Temperature	Relative Humidity	Comments
Frozen Meats	-10° F to 0° F	-----	Any product that is received frozen must be kept frozen.
Canned Products	35° F to 75° F	50 to 60%	
Honey	35° F to 75° F	50 to 60%	May crystallize if stored in refrigeration.
Raisins	35° F to 75° F	50 to 60%	Will only last 5 to 9 months if stored at 70° F To remain fresher for 18 months, store at 40° F
Milled rice	35° F to 75° F	50 to 60%	

Section VI

Distribution Sites

All soup kitchens, homeless shelters, and food pantries that distribute USDA Foods must be contracted as a TEFAP distribution site. To be selected as a TEFAP contracted food bank, an agency must:

- Be a local governmental agency or a private, non-profit organization with proof of 501(c)(3) tax exempt status
- Maintain an established operation involving the distribution of donated food on a regular basis as an integral part of its normal activities
- Distribute donated food to pantries, soup kitchens, and homeless shelters
- Assure that each distribution site has a policy of non-discrimination and that donated food is made available to all eligible households to the extent that such food is available
- Assure that each storage site used by the food bank and the distributions sites complies with storage requirements in terms of temperature, security and rodent control
- Provide training to the pantry and soup kitchen staff on TEFAP program procedures
- Conduct monitoring of distribution site activities at least once every two years
- Maintain accurate receipt, distribution, commodity inventory and fiscal records
- Assure that pantries and soup kitchens maintain regularly scheduled weekly hours and adhere to the program requirements
- Conduct outreach activities in the service area to make the community aware of donated food resources
- Investigate and handle complaints of irregularities and provide reports to IDHS
- Distribute SNAP applications (the Supplemental Nutrition Assistance Program, formerly known as the Food Stamp Program) or website/contact information for the purpose of helping potential eligible public apply for SNAP benefits; and distribute additional to provide program or other information, including but not limited to TEFAP Food Pantry, Soup Kitchen, & Homeless Shelter Manual and brochures on various programs

- Compile information from Signature Sheets / Proxy Forms and meal-service reports which includes the number of individuals and households served as well as those that receive SNAP benefits and the number of times SNAP applications or website/contact information was provided
- Copies of signature sheets are no longer required to be submitted to the respective food bank. Signature sheets must be stored at the distribution site for the current year plus three years. A total count of signature sheets must be submitted to the respective food bank monthly.

THE PHYSICAL DISTRIBUTION SITE

The distribution site is the location where donated food is actually distributed to neighbors. Distribution sites are primarily soup kitchens, homeless shelters or food pantries. Private residences may not be used to store or distribute USDA Foods.

GEOGRAPHIC RESTRICTIONS

Geographic restrictions may be imposed by distribution sites only with the approval of the regional food bank distributing TEFAP goods. The Geographic Restriction Request Form is required to be completed and submitted to the appropriate food bank. A valid justification for the requested restriction(s) must be fully and clearly explained and cannot discriminate against protected classes listed in the USDA Non-Discrimination Statement.

ACCEPTING COMMODITIES

Distribution sites in Illinois may have their commodities delivered by one of three methods:

- The distribution site picks up the commodities at the food bank with a truck and personnel furnished by the distribution site.
- Food bank's personnel deliver the product to the distribution sites in trucks furnished by the food bank.
- The distribution site truck and personnel meet the food bank delivery truck at **an agreed upon place** and time to receive commodities.

Food banks must account for federal commodities released to sites. The food bank must use an invoice which records the signature of the site representative receiving the USDA Foods. It also records the amount of each product received by the site, **the site name, date of delivery** and address. Food banks are responsible for retaining documentation for distribution.

TRANSFERRING COMMODITIES

Transfer of donated foods to another recipient agency (food pantry, soup kitchen, or shelter). The transfer of USDA commodities from one recipient agency to another within the same county is permissible.

UNLOADING TRUCKS

Distribution sites may have regular volunteers or paid Staff to unload trucks. Sites may have income-eligible recipients who are willing to volunteer to unload. However, unloading the truck cannot be made a requirement for customers to receive the commodities, nor can it be used as an in-kind agreement for volunteers to receive more food products than they would normally receive.

Whoever unloads the product must be made aware of the importance of counting the product as the shipment is received. Accurate accounting of USDA Foods will be impossible if an exact count is not made when the product is unloaded. The necessity of checking for damaged or spoiled product is extremely important and a Commodity Loss Report [[Exhibit E](#)] or Out-of-Condition Report [[Exhibit D](#)] will need to be completed.

STORAGE REQUIREMENTS

Soup kitchens and food pantries must all provide proper storage facilities for the commodities received from a food bank. All sites must comply with the same storage and handling regulations that apply to food banks. Those regulations include any directives from USDA, IDHS, Illinois Department of Public Health and the local public health department with jurisdiction where the site is located. Food banks and distribution sites may be held financially liable for loss product due to damage, theft or spoilage due to improper storage and handling. The food bank is responsible for assuring that the distribution sites under contract provide proper handling, care and storage of donated food including USDA Foods.

AMOUNT IN STORAGE AND PROLONGED STORAGE OF USDA COMMODITIES

For TEFAP, inventories of each category of donated food may not exceed an amount needed for a six-month period, based on an average amount of donated foods utilized in that period. [7 CFR 250.12\(c\)\(1\)](#).

For commodities stored in warehouses over six months, food banks must notify the IDHS TEFAP Manger with a written request and/or proposal for distribution. (See sample report below.)

Material	Material Description	Date Rec'd	Cases Rec'd	Remaining Cases	Distribution Plan	Sales Order #	SO Item #	Purchase Order #	PO Line Item	Signed By	
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/17/2016	950	50	AUGUST	5000282058	100	4100009198	42	TYSON FOODS, INC.	TIM WOODEN
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/19/2016	950	0		5000282058	200	4100009198	43	TYSON FOODS, INC.	TOM BROWN
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/24/2016	950	0		5000282058	300	4100009198	44	TYSON FOODS, INC.	TOM BROWN
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/26/2016	950	0		5000282058	400	4100009198	45	TYSON FOODS, INC.	TOM BROWN
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/11/2016	950	0		500082100	100	4100009187	114	OK FOODS, INC.	ANTON JACKSON
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/4/2016	950	800	AUGUST-NOVEMBER	500082100	200	4100009187	113	OK FOODS, INC.	TOM BROWN
110094	CHICKEN LEG QTR FRZ BAG-4/10LB	2/1/2016	950	0		500082100	300	4100009187	112	OK FOODS, INC.	TOM BROWN
110056	RAISIN BAG-6/5 LB	2/23/2016	1378	300	AUGUST-OCTOBER	5000285927	100	4100009558	206	SUN-MAID GROWERS	TOM BROWN
1100295	RAISINS PKG-24/13 OZ	2/4/2016	1728	28	AUGUST	5000285946	100	4100009557	27	LION RAISINS	GREG LOBEZ
1100295	RAISINS PKG-24/13 OZ	2/26/2016	1728	8	AUGUST	5000285953	100	4100009557	226	LION RAISINS	TIM WOODEN
1100295	RAISINS PKG-24/13 OZ	2/26/2016	1728	1	AUGUST	500285951	200	4100009557	275	LION RAISINS	TIM WOODEN

PUBLIC OUTREACH

The food bank must publicize within its service area the regularly scheduled days and times of operation of its sites. TEFAP provides signs that specify days and hours of operation. This sign is required to be posted at all distribution sites. Posters, pamphlets, social media, and newsletters throughout the geographic service area are a recommended form of public outreach. Placing notices in local newspapers to make potential recipients aware of the availability of commodities is another acceptable method of public outreach. Public Service Announcements should be provided to local radio and television stations. Activities by the local distribution sites do not relieve the food banks of responsibility for conducting public outreach activities. Word of mouth may not be used as the sole or primary method of conducting public outreach.

PRODUCT QUALITY LIABILITY

Food banks are required to protect the value of USDA donated foods and are required to have insurance according to [7 CFR Part 250.12 \(d\)](#). However, distribution sites will not be held liable for product quality except in cases of negligence on their part. Food banks

and distribution sites will be held liable if they knowingly distribute commodities that are spoiled, especially if the spoilage occurred because of negligence on their part.

MINIMIZING LOSSES

Many distribution sites in Illinois are staffed completely by volunteers. For that reason, insurance is not required of the distribution sites. However, sites are still obligated to conduct their operations in a responsible manner to keep losses at a minimum. Distribution sites must carefully follow approved storage and handling procedures. Distribution sites should use the First In/First out (FIFO) inventory control system.

REPORTING LOSSES

IDHS requires that food banks explain all losses, including those experienced by their distribution sites. IDHS is required by federal regulations to pursue recovery of the value of all food loss due to fraud or negligence. If commodities are damaged during the month, food banks are required to submit a TEFAP Commodity Loss Report & Claims Decision Form ([IL444-4040 R-03-20](#)).

When the value of any loss (damaged) commodity is below \$500, the Commodity Loss Report form should be completed and submitted to TEFAP as soon as possible, but not later than the 15th of the following month.

When the loss is at or above \$500 but less than \$100,000, IDHS should be notified via email and Commodity Loss Report immediately. A follow up phone call to the TEFAP program manager is recommended as well, but not required. IDHS will review the loss and determine whether or not a claim is required.

When losses are valued over \$100,000 (whether for one particular product OR one occurrence involving multiple products), food banks must notify IDHS immediately by phone and forward all loss documentation to IDHS TEFAP program manager for transmission to the FNS Regional Office for claim determination. Based upon the commodity claim determination, restitution may be required either by the collection of funds or by the in-kind replacement of food in lieu of payment to FNS.

FOOD PANTRIES

Food pantries in Illinois operate in a variety of ways. Their hours vary widely, depending upon the level of need in the area where they are located and the resources available to the organization operating the pantry. Food pantries must be government agencies or non-profit organizations with tax-exempt status. The physical facility must be safe and appropriate for storing and distributing donated food.

Larger pantries may be open 8 hours a day, Monday through Friday. Some pantries operate only on Saturdays to serve those whose jobs prevent them from being served during the week. Small pantries, operating on limited budgets, may operate only one afternoon a week. The facility must, however, keep regular weekly hours for a minimum of two hours to be considered a pantry unless specifically approved by IDHS for a rural exemption. Food pantries may not require appointments for service. To be considered open, a food pantry must serve eligible persons from the community who walk in and request food.

A pantry must be open to the general community. The population served by a food pantry may be restricted on the basis of geographic service area. A geographic service area is generally the county for which it resides. However, Cook County is broken down by zip code. If the public accessing the food pantry are not residents of the designated service area, they must be served the first time and then referred to the food bank for direction to the food pantry serving their area, or to obtain an exception from the food bank.

Pantries contracted to participate in the TEFAP program may not restrict an eligible customer's receipt of food to more than 30 days from the last date food was received.

DATA COLLECTION

Federal regulation [7 CFR 251.10\(a\)\(3\)](#) states that each distribution site must collect and maintain on record for each household receiving TEFAP commodities for home consumption, the name of the household member receiving commodities, the address of the household (to the extent practicable), the number of persons in the household, and the basis for determining that the household is eligible to receive commodities for home consumption. All information that is not required by Federal regulation, and is therefore unrelated to TEFAP, must be completely optional for participants and must be clearly identified as such on any publications or applications. – [7 CFR 251.10\(f\)](#)

Prior to the collection of data, the agency site must request authorization from the food banks and the food banks must provide the State with a plan that includes the following:

- time frame for the data collection
- how the data will be collected
- purpose of the data collected
- How information will be safeguarded from unauthorized use.

How to best approach this data collection:

1. collect the information on a separate form
2. do not associate the data with an individual or a household; for example, Robinson family is part Indian and German
3. *inform participants that not providing the information will have no impact on program eligibility or participation*
4. identify the purpose of the data collected
5. identify or limit the duration of data collection (e.g., July 2019 – January 2020)
6. identify how the information will be safeguarded from unauthorized use and
7. provide a disclaimer regarding the use of the data

COMMODITIES ARE SUPPLEMENTAL

Whatever its size, the food pantry must have the resources to provide neighbors with privately donated food in addition to USDA Foods. USDA Foods must be used as a supplement to privately donated food. Privately donated food includes food received from food banks, food directly donated to the pantry or food purchased with monetary donations. USDA food commodities may not be distributed separately from other food given out by the food pantry.

PERISHABLE COMMODITIES

Under the Emergency Food Program Rules, the distribution of USDA Foods, privately donated, and purchased foods must be completed within regularly scheduled hours of operation. The only exception to the rule is the distribution of perishable commodities.

Perishable commodities, e.g., deli, dairy, produce and bakery, have a very limited shelf life. For this reason, pantries are allowed to expand their regularly scheduled hours of operation in order to distribute perishable commodities promptly. As with TEFAP USDA Foods, Public Outreach activities must be conducted within its service area for the distribution of perishable commodities. Pantries should provide as much advance notification to the public as possible.

IDENTITY AND RESIDENCY

Although not required, food pantry staff may request proof of identity and residency to verify that the recipient resides in the designated area served by the distribution site – as long as each recipient is asked at each time of service. There must be consistent approach to verify identity and residency for all participants. Example: If the pantry requests proof of identity for one individual at the pantry, it must request proof of identity for all individuals that come to the pantry. The types of documentation include a driver's license, state identification card, piece of mail or utility bill showing the recipient name and address, or a landlord letter verifying identity and residency. All recipients must be residents of Illinois. A minimum length of stay is not required. Distribution sites are not allowed to ask for social security cards, pay stubs, or income data to verify identity and/or residency. [7 CFR 251.5\(b\)](#)

The completion of Signature Sheets is a requirement regardless of whether USDA Foods are being distributed along with perishable commodities and regardless of whether perishable commodities are being distributed during regularly scheduled hours of operation or during expanded hours of operation. The completion of the Signature Sheet must be adhered to by all neighbors. *Verbal signatures are allowed.*

INCOME

Self-attestation is accepted as a means of documenting income eligibility. The signatory for the household receiving USDA Foods must sign (a verbal signature is allowed) the Signature Sheet to attest that the monthly income of the household is equal to or less than 300% the federal poverty level for the household. Income levels for various size households are pre-printed on the Signature Sheets used for self-declaration. Distribution sites are prohibited from verifying income. Distribution sites are not allowed to ask for social security cards, pay stubs or income data.

SERVING HOMELESS RECIPIENTS

Self-declaration by homeless recipients shall be accepted. Homeless persons may lack documentation to verify their identity or residence. In case of lack of documentation, the distribution site may indicate "NONE" in the address section of the Signature Sheet. The site must strive to serve the homeless recipient and use their discretion in providing the types of foods that are appropriate and easy to use and prepare. Distribution site staff is encouraged to work with homeless persons by referring the homeless person to social services agencies which may aid in obtaining documentation and other services.

Recipients at sites serving prepared meals are presumed eligible for USDA Foods. Documentation is not allowed at Soup Kitchens.

Food pantries may request an exception to the documentation policy when the documentation is required for receipt of grant from another governmental agency or a private foundation. To receive an exception, the food pantry should submit the written reporting requirements from the governmental agency or private foundation requiring the documentation. Both the food bank and IDHS will review the request to determine the necessity for the exception and the least intrusive method of complying with the reporting requirement. If approved by both the food bank and IDHS, a written exception specifying the types and frequency of documentation activities will be issued. If, for example, a food

pantry must provide annual demographic data on its caseload, and if an annual survey is an allowable method of collecting the data, the exception will specify that the documentation be collected once a year as required by the funding source.

REFERRALS

The practice of requiring referrals from external agencies is not permissible. Although the practice is intended to control program abuse, IDHS finds it to be ineffective and unnecessarily burdensome. Furthermore, the practice violates proper program eligibility procedures by allowing non-contracted entities to determine access to the program through the application of standards that are not known, approved, or monitored by USDA and IDHS.

EXPLICITLY RELIGIOUS ACTIVITIES

Customers or prospective participants must not be required to participate in explicitly religious activities in order to receive TEFAP commodities. Organizations that receive USDA direct assistance under any USDA program may not engage in explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, as part of the programs or services funded by USDA direct assistance. - [7 CFR Part 16.4 \(b\)](#)

- If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services supported with USDA direct assistance.
- Organizations must make it clear that explicitly religious activities are not endorsed by USDA.
- Organizations cannot use TEFAP funds to support any explicitly religious activities, speech, or materials.

RURAL EXEMPTION

IDHS encourages the development of innovative designs to meet the emergency needs of residents of rural areas. Special operating procedures and limited hours of operation may be approved to allow the effective provision of emergency food in sparsely populated rural areas. The food bank must complete and submit the Annual Request for Rural Exemption which can be requested from program staff. Send request to dhs.iefp@illinois.gov.

SOUP KITCHENS

Soup kitchens serve prepared meals, in a congregate setting, without charge, to homeless, transient, and other needy persons. The meals must be served on a regular basis, at minimum two hours per week, in a clean, secure environment as a regular part of services. A soup kitchen must be a governmental agency or non-profit organization with tax-exempt status. The physical facility must be safe and appropriate for storing and distributing donated food. Soup kitchens that are not homeless shelters must conduct public outreach and serve all needy persons. Soup kitchens may not be restricted to special populations such as elderly or children.

Homeless Shelters are considered Soup Kitchens under TEFAP definitions but may restrict service to customers residing in the shelter. All homeless shelters funded by the IDHS Homeless Services and Supportive Housing Unit are eligible to receive USDA food commodities under the soup kitchen category. Residential treatment facilities do not qualify for TEFAP.

ELIGIBILITY

It is assumed anyone eating at a soup kitchen is income eligible and no certification or documentation of eligibility may be requested. The “And Justice For All” poster must be in plain view of all participants.

STORAGE AND RECORDS

Soup kitchens must abide by the storage standards set by USDA, IDHS, IDPH and the local health department. Soup kitchens are not allowed to collect signatures and household size from customers. Only the actual number of meals served by the Soup Kitchen is required to be reported to the food bank on a monthly basis.

FOOD HANDLING AND MEAL PREPARATION

Special food handling requirements for a soup kitchen include:

- use of non-porous countertops, preferably stainless steel (NSF)
- Disinfecting all countertops and utensils. A cold-water bleach solution may be used (red and green buckets)
- use of new/properly sanitized reusable food storage containers; not plastic bags
- food handlers must wash hands, wear hair nets and disposable plastic gloves
- no smoking is allowed in food preparation area
- shirt pockets must be emptied and jewelry that could fall into food must not be worn
- area must be free of any type of contaminants such as insect, dust or other foreign matter
- other local public health ordinances, as applicable

Food banks should contact local public health officials for more information on proper food handling, preparation procedures and standards for soup kitchens.

SECTION VII

Eligibility Guidelines

FEDERAL REGULATIONS

USDA regulations require that states set standards for determining the eligibility of households to receive USDA Foods. The standards must be based on income and household size. The federal regulations allow state standards to include a requirement that the household live in the state, but the length of residency in the state cannot be considered.

ILLINOIS REQUIREMENTS

In Illinois, IDHS has set the income eligibility standard at 300% of federal poverty levels for households. Households must be residents of the State of Illinois and are required to provide proof of identity and residency. Length of residency is not relevant. All eligible households must be served on a first visit and may not be denied service if the household is a new resident or homeless and cannot give proof of residency. “NONE” or any legitimate address, like the food pantry address, may be used in the address section of the Signature Sheet for those homeless or disabled who are unable to provide proof of residency. Households must also be residents of the distribution site service area. Distribution sites must serve households who may reside outside of the designated service area on a first visit. Distribution site staff may then refer the household to the food bank to get information and directions to the distribution site providing service in their area of residency.

Although no other eligibility requirements may be imposed on individuals seeking food assistance, food banks may only establish geographic service areas for its pantries with the approval of IDHS.

HOMELESS CUSTOMERS

Homeless people are presumed to be residents of the State. Homeless persons accessing food at the Food Pantry must self-attest for eligibility (Signature Sheet). Homeless persons may lack documentation to verify their identity or residence. In case of lack of documentation, the distribution site may indicate “NONE” or any legitimate address, like the food pantry address in the address section of the Signature Sheet.

POSTING GUIDELINES

Food banks must ensure that Food Pantries display the following posters:

- Food Pantry Operating Schedule laminated poster - The poster lists the days of the week and hours of the day that the food pantry is open to the public.
- And Justice For All - The poster instructs the recipient on what action to take in case of discrimination.
- Income Eligibility Guidelines - The poster lists the maximum allowable monthly gross income for varying household sizes in order to be eligible to receive commodities.
- Notice To Program Participants - The poster lists the conditions the recipient agrees to upon signing the Signature Sheet.
- Prohibited Activities - The poster lists unallowable activities in food pantries.
- Written Notice and Referral Requirements

Soup kitchens are required to display only the “And Justice For All” poster and the Soup Kitchen Operating Schedule laminated poster.

WHAT IS INCOME

Monthly household gross income must be at or below the standards listed on the Income Eligibility poster. All sources of income for each and every member of the household must be included. Household gross income includes all wages, pensions, Social Security, Supplemental Security Income, Railroad Retirement, income from rental or leased property, interest or dividends from savings, certificates of deposit, stocks, bonds and income from all other sources. That may include, but is not limited to, strike benefits, unemployment compensation, alimony, veteran’s benefits and regular insurance or annuity payments. ***Self-attestation of income is required, but no verification is needed.***

PROXIES

Homebound or eligible customers unable to access the pantry may be served by proxy. The IDHS Proxy Form [Exhibits G and H] must be completed; the customer must complete a new Proxy Form annually OR when designating a new proxy. A customer can designate as many proxies as needed to ensure his or her food package is picked up each month. In other words, the customer can designate Joe in February and Beth in March as a Proxy. A designated proxy can also serve as the proxy for more than one participant. For example, Joe can pick up for Mary, Larry, and Moe.

Proxy Forms [[Exhibit G and H](#)] must be attached to Signature Sheets [[Exhibit B & C](#)] submitted to the food bank for the distribution month. Customers served by proxy should not also be entered on the Signature Sheet.

The proxy allows a third party to pick up food for the customer. The Proxy Form identifies the third party and documents that person's authorization for acting on the customer's behalf. When a proxy is used, these rules must be followed:

- The customer must enter the name of person he/she designates as his/her "proxy."
- The customer must sign the Proxy Form. Only original signatures are valid.
- The designated proxy must sign the Proxy Form at the pantry upon each visit at the time of pick up.
- An authorized pantry personnel person must sign the Proxy Form at the pantry at the time of pick up as final validation of proxy service.

Proxy Forms [\[Exhibit G and H\]](#) must be attached to Signature Sheets [\[Exhibit B & C\]](#) submitted to the food bank for the distribution month. Customers served by proxy should not also be entered on the Signature Sheet.

SECTION VIII

Financial Management

ADMINISTRATIVE FUNDING AWARDED TO FOOD BANKS

Administrative funds are awarded to food banks for the storage, handling, and distribution of donated food. Funds awarded under the RFP may be used for such costs associated with privately donated food as well as USDA Foods. Food recovery activities that distribute donated prepared food are also allowable expenditures. Administrative funds will be disbursed as a grant based on an approved line-item budget. Documentation of all expenditures must be maintained. Funds awarded are determined through use of the same 60% poverty/40% unemployment formula that is used to allocate USDA food commodities. The exception to the formulaic award is the establishment of a maximum amount any one food bank can receive. IDHS establishes the maximum.

Food banks are subject to Title 89 Illinois Administrative Code, Part 507 “Audit Requirements of IDHS” and Part 509 “Fiscal/Administrative Recordkeeping and Requirements.” The Illinois Administrative Code may be accessed on the IDHS web site.

PAYMENT TO FOOD BANKS

Providers will submit a monthly financial report outlining expenses the food bank needs to be reimbursed. Monthly reimbursement payments will be issued for the prospective month at the discretion of IDHS. Payments are only made with the receipt of expenses incurred. Payment request must be received by the 15th of the month after expenses were incurred.

TANF funding is issued each year around January and February or at the discretion of IDHS, based upon approval of an annual IDHS approved budget for TANF Food Purchase Program. The contracted provider is awarded a TANF grant to purchase food items in bulk for distribution to food pantries. A maximum of 5% can be used for allowable distribution and handling costs (i.e., fuel, freight, and warehousing costs) directly associated with the storage, handling and distribution of the TANF food. Each food bank must submit reimbursement for TANF expenses. TANF foods must be distributed no later than the end of June 30th each year.

Food banks must enter their budgets annually into the CSA and TEFAP portal and update as funding increases and/or decreases. Food banks are required to track distribution of TANF foods via the Signature Sheet [[Exhibit B & C](#)] and/or Proxy Forms [[Exhibit G & H](#)].

IDHS TEFAP will audit TANF records at least once every 3 years; audit will include:

- Records showing distribution time frame
- Statistical data such as the number of children, and the number of households served
- Documentation (vendor invoices) showing what product(s) was purchased, the quantities, individual pricing, total price paid
- Ledger entries and deposit documentation

The food banks are required to submit monthly expenditure information to IDHS on TEFAP Financial Report via TEFAP portal; **refer to Section 10 (Financial Data Reporting)**. Payments to the food bank under TEFAP may not exceed approved expenditures.

ALLOWABLE EXPENDITURES

All expenditures must meet federal cost standards as established by federal regulations and Office of Management and Budget (OMB) Circulars. OMB Circular A-87 provides cost principles for State and Local Governments. Allowable expenditures are those that are directly associated with the distribution, handling and storage of USDA Foods and privately donated food. In order to be allowable, expenditures must be reasonable and appropriate and must be reported at the price actually paid. Services or activities directly related to the distribution, handling and storage of USDA Foods and privately donated food may be purchased by or directly provided by the recipient agency. Documentation must be maintained to substantiate all expenditures. Allowable expenditures are limited to the following categories.

ACCOUNTING

The cost of establishing and maintaining accounting and other information systems required for the management of the program is allowable. Costs of an independent audit are allowable.

ADVERTISING

The cost of advertising for the purpose of public outreach of distribution site locations and schedules is allowable.

BUILDING AND FACILITY RENTALS/LEASES

The cost of rental facilities for office space and/or food storage associated with donated food storage and distribution is allowable. The cost of rentals allocated to the donated food program must be prorated in direct proportion to the space utilized. Facilities must meet criteria outlined in the contract. Rates may not exceed those for comparable facilities within the area.

COMPENSATION FOR PERSONNEL SERVICES

Salaries and fringe benefits for services of employees directly involved with storing and the distribution of TEFAP and TANF food commodities are allowed to the extent that compensation is reasonable and pro-rated in direct proportion to the percentage of time engaged with the donated food program.

Expenditures for personnel services must be supported by records of payment, in addition to time and attendance records for individual employees. In the event of a substantial increase in an organization's level of employee compensation, an examination will be made to determine the reasonableness of the increased compensation, particularly when the increased compensation level was concurrent to an increase in the ratio of funding for federal program activities to other activities of the organization. Compensation to members of the organization, trustees, directors, associates, officers, or immediate families will be reviewed to determine if compensation is reasonable for actual services rendered.

When an organization is predominantly engaged in activities other than those that are federally funded, employee compensation will be considered reasonable to the extent that it is consistent with compensation for similar work in the organization's other activities. Records to support salaries must be available for examination, including the number of employees, salary and amount of time each employee is engaged in these activities.

Compensation to employees of an organization predominantly engaged in federally funded activities will be considered reasonable to the extent it is comparable to prevailing compensation for similar work in the area labor market.

EQUIPMENT

The cost of office, warehouse, and other equipment necessary to perform donated food distribution is allowable when authorized by IDHS as part of the Contractors approved line-item budget.

INSURANCE EXPENSES

The cost of insurance coverage for the donated food program is allowable.

SUBCONTRACTOR PAYMENTS

A subcontractor may be paid by the food bank for expenses, if these expenses would be allowable if incurred by the food bank. Such expenses include staff salaries and equipment.

MAINTENANCE AND REPAIRS

Expenditures for necessary maintenance, repair or upkeep of equipment and property utilized in the donated food program are allowable.

MATERIALS AND SUPPLIES

Expenditures for materials and supplies (e.g., postage, printing, Xeroxing) directly needed for the program operation are allowable.

TRAINING AND EDUCATION

Expenditures for in-service training and meetings of agency and sub-contract or personnel, which directly benefit the donated food program, are allowable.

DELIVERY OF DONATED FOOD

Expenditures for freight, cartage and delivery costs associated with distribution and handling of donated food are allowable.

STAFF TRAVEL

Program-related travel expenses of food bank staff and volunteers may be charged at the food bank's prevailing rate of reimbursement.

UTILITIES

The cost of utilities (gas, electricity, telephone, etc.) for facilities used in the operation of the program is an allowable expense. The amount charged must be in direct proportion to the space utilized for the donated food program or be documented actual expenditures for program staff.

SECTION IX

Federally Funded Purchased Equipment

The Federally Funded Equipment Reporting Instructions are in accordance with both State (CMS Property Management Rules, 5010) and [2 CFR 200.313\(a\)](#) regulations. The title to equipment acquired under a grant will vest in the food bank, subject to conditions of this section, and must be used in TEFAP for which it was acquired as long as needed, whether or not the project or program continues to be supported by federal funds. Equipment shall be used by the food bank or relocated to a Pantry, Soup Kitchen or Homeless Shelter.

When equipment is no longer needed for the original program, the equipment may be used in other activities currently or previously supported by a federal agency. If/when IDHS exercises its right to take title; the equipment shall be subject to the provisions for federally owned equipment.

All food banks are required to be in compliance with The Emergency Food Assistance Program Equipment Inventory Tracking requirement. This requirement includes completing the Federally Funded Equipment Inventory Worksheet [IL444-4542.pdf \(state.il.us\)](#) for all federally funded equipment with a purchase price equal to or greater than \$5,000, retaining documentation, tracking, and reporting equipment inventory purchases to the IDHS Emergency Food Program. Every two years, and/or as part of the TEFAP monitoring process, TEFAP will request updated Federally Funded Equipment Inventory Worksheets – use [[Exhibit I](#)] as documentation showing that a physical inventory was completed.

MAINTAINING PROPERTY RECORDS

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place must, at a minimum, meet the following requirements:

Property records must be maintained that include a:

- description of the equipment
- serial number or other identification number
- source of equipment
- title holder
- acquisition date
- cost of the equipment
- percentage of federal participation in the cost of the property
- location of equipment
- use and condition of the equipment
- ultimate disposition data including date of disposal and sales price

EQUIPMENT INVENTORY REPORTING

Every food bank will be held accountable for keeping track of all federally funded equipment. A physical inventory of equipment shall be taken, and the results reconciled with IDHS Emergency Food Program equipment records, at least once every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The food bank shall, in connection with the inventory, verify the existence, current utilization, and continued need for the equipment.

The food bank must retain documentation of all physical inventories for a total of five (5) years. The food bank must be able to physically find or identify the exact physical location of equipment for audit purposes. Each food bank must keep an updated Federally Funded Equipment Inventory Worksheet for each item. When equipment is moved, the Federally Funded Equipment Inventory Worksheet must be updated accordingly and submitted to the IDHS Emergency Food Program.

If a pantry closes, the federally equipment must be returned to the respective food bank so that the food bank can redistribute the equipment to another qualified pantry or another food bank. A Federally Funded Equipment Inventory Worksheet for the redistribution of federally equipment is required. If a pantry closes and equipment is not returned, equipment is considered stolen and procedures for theft must be pursued.

SAFEGUARDS TO PREVENT LOSS, DAMAGE, OR THEFT OF EQUIPMENT

A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft shall be investigated, fully documented, and the IDHS Emergency Food Program must be promptly notified. Adequate maintenance procedures must be developed to keep the equipment in good condition.

For equipment that is lost or damaged, the food bank must complete the Federally Funded Inventory Worksheet and submit a written request to the IDHS Emergency Food Program to delete from inventory. Refer to the section, "Disposal of Equipment" for disposition procedure of damaged equipment.

For evidence of theft revealed during an inventory, or at any other time, such evidence must be immediately reported to local law enforcement officials. A copy of the police report along with the Theft Incident Report must be forwarded to the IDHS Emergency Food Program. Upon closure of the investigation, the Federally Funded Inventory Worksheet must be updated and submitted to the IDHS Emergency Food Program requesting the removal of the stolen item from inventory.

DISPOSAL OF EQUIPMENT

Per [2 CFR 200.313\(e\)](#), when original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency. [Subject to prior IDHS approval.] [2 CFR 200.313\(e\)\(1\)](#)

2) Items of equipment with a current per-unit fair market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses. [Subject to prior IDHS approval.] [2 CFR 200.313\(e\)\(2\)](#)

The IDHS Emergency Food Program must be notified in writing **prior** to the disposal of federally funded equipment. Disposal includes transactions that change the status of equipment from active to non-active, e.g., transfer of ownership, trade-in or sale, disposal or cannibalization. The food bank must physically retain possession of equipment until prior approval from the IDHS Emergency Food Program is obtained and proper documentation is completed.

TRANSFER OF EQUIPMENT OWNERSHIP

Ownership of federally funded equipment can be transferred between food banks. A copy of the Federally Funded Equipment Inventory Worksheet must be forwarded to the recipient food bank who will, in turn, submit an updated Federally Funded Equipment Inventory Worksheet so that the location of the equipment can be accurately reflected in the inventory system.

TRADE-IN OF EQUIPMENT

When acquiring replacement equipment, the food bank may use the equipment to be replaced as a trade-in, subject to prior approval from the IDSH Emergency Food Program. Approval will be granted when the requested trade-in is economically advantageous to the Emergency Food Program. The request must contain:

- description of the equipment to be traded-in including:
 - date purchased
 - inventory number
 - serial number, if applicable
- description of the new equipment the agency is seeking to obtain
- name of the person or business accepting the trade-in
- cost of the new equipment
- value allowed on the trade-in

When the food bank is authorized to trade-in the equipment, the food bank must complete and submit two (2) Federally Funded Equipment Inventory Worksheets: one worksheet for the deletion of equipment that was traded-in, and another worksheet for the replacement equipment. The trade-in value will be the depreciated price of the newly acquired equipment.

When acquiring replacement equipment, the food bank may sell the equipment and use the proceeds to offset the cost of the replacement property, subject to prior approval from the IDHS Emergency Food Program. Approval will be granted when the requested sale is economically advantageous to the Emergency Food Program. The request must contain:

- description of the equipment to be sold, including:
 - date purchased
 - serial number, if applicable
- name of the person or business buying the equipment
- amount of the sale

Food banks are required to follow State and Federal Procurement Standards to purchase equipment with federal funds. Funds must be specifically allocated for equipment purchases in the food bank's approved IDHS budget. Three comparative bids are required and must be submitted to the IDHS Emergency Food Program for approval. Once the acquisition process is completed and equipment received, a Federally Funded Equipment Inventory Worksheet for each item with a purchase price of \$5000 or more must be completed. The completion and submission of the Equipment Inventory Worksheet is the first step to ensure compliance with regulations defined by the Federal government. The sale price becomes the new price of the newly purchased equipment.

SCRAPPING OF EQUIPMENT

Prior to scrapping federally funded equipment, IDHS approval must be obtained. The equipment in question must be:

- damaged beyond repair
- severely damaged such that it is not economically practical to repair
- valued so low that it is not economically practical to ship it for redistribution or offer it for sale
- no longer useful to IDHS and is not marketable

Upon approval, the food banks is responsible for legally disposing of the equipment in accordance with all rules and regulations. An updated Federally Funded Equipment Inventory Worksheet must be completed and submitted for the deletion of equipment from inventory.

CANNIBALIZATION OF EQUIPMENT

IDHS approval must be obtained prior to the cannibalization of federally funded equipment. Cannibalization is the use of the parts from one piece of equipment to repair another piece of equipment. Permission will be granted if cannibalization represents an economical use of the equipment to be cannibalized. Upon approval, an updated Federally Funded Equipment Inventory Worksheet must be completed and submitted for the deletion of equipment from inventory.

EQUIPMENT MONITORING

Every two years, and/or as part of TEFAP monitoring process, TEFAP will request updated Federally Funded Equipment Inventory Worksheets as documentation showing that a physical inventory was completed.

OWNERSHIP OF EQUIPMENT

When the Federal awarding agency exercises its right to take title, the equipment shall be subject to the provisions for federally owned equipment.

EQUIPMENT DEPRECIATION PROCESS

Every food bank must implement a system to track the depreciation of all federally funded equipment.

Section X

Records and Reports

FOOD BANK REPORTS TO IDHS

Failure to submit accurate and timely reports/data may result in the withholding or reduction of USDA Foods and/or TEFAP/TANF funding. All records, forms, and reports are subject to an audit review and are to be maintained for a period of five (5) State Fiscal years (July thru June) from the close of the state fiscal year to which they pertain. All reports are required to be submitted no later than the **15th** of following month.

MONTHLY INVENTORY REPORT (FOR USDA FOODS)

A physical inventory of all USDA Foods is mandatory once a month to reconcile against book inventory. A report must be submitted showing all USDA Foods in- stock and their corresponding receipt date.

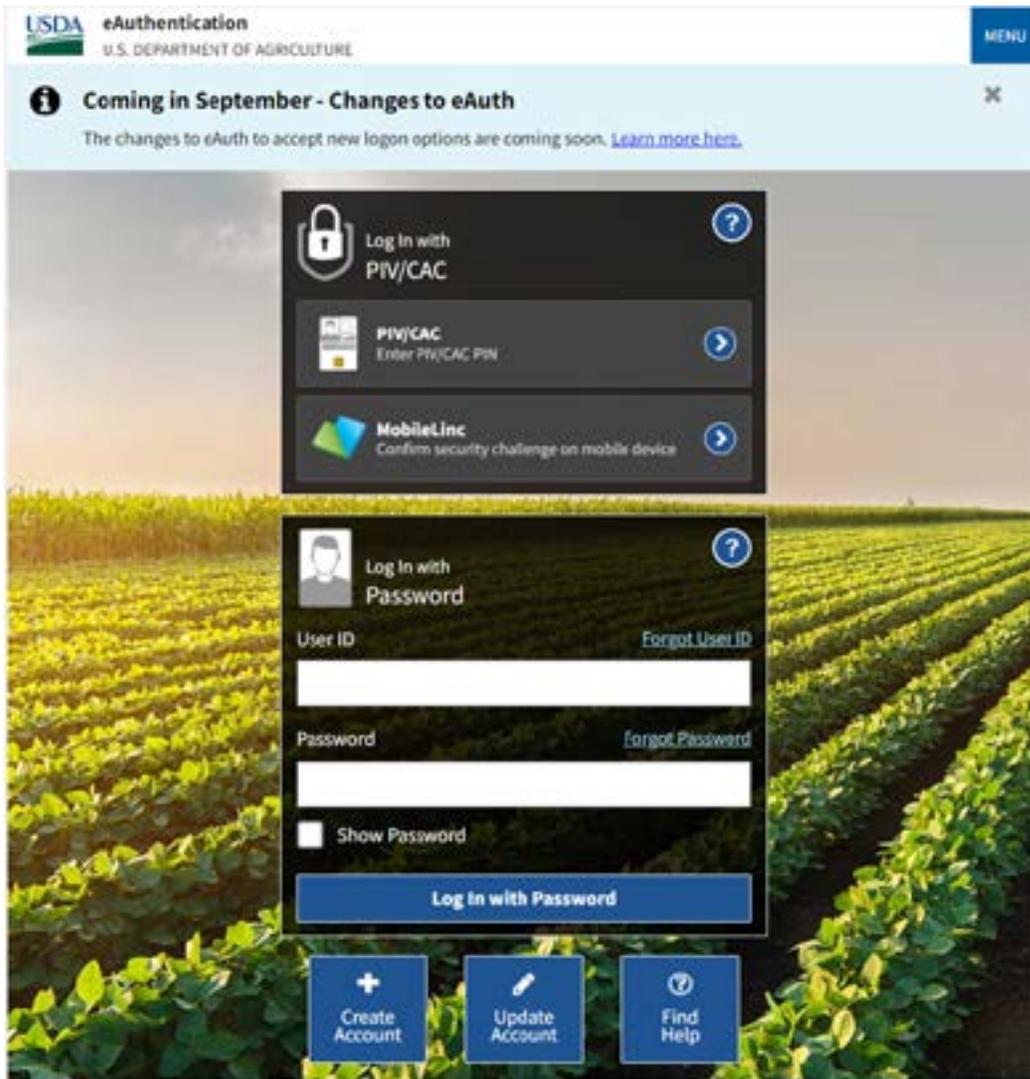
LOSS OF COMMODITIES

Commodity Loss Report and Claims Decision Form must be completed as the last is reported and/or uncovered. [[Exhibit E](#)]

COMMODITY RECEIPTING

Food banks are responsible for sending Receipt(s) to DHS.IEFP@Illinois.gov.

TEFAP policy requires receipting of all USDA Foods into TEFAP website upon receipt of USDA Foods. Each date that a food bank receives commodities, the food bank must complete the online Commodity Receipt Form and submit to IDHS immediately for State-level receipting into [Web Based Supply Chain Management](#) (WBSCM). A training manual for WBSCM is available [[Exhibit L](#)] and a linked image of the login page is on the next page.



To complete the online Commodity Receipt Form, follow these instructions: Login to the website www.illinoisfoodbanks.org/login.asp.

1. After logging in, use the 'Data Entry' dropdown box and click 'Commodity Receipt'
2. Click dropdown for SFY then food bank name; click submit
3. Review the BOL and make sure that the following information matches the correct commodity chosen from TEFAP table match
 - a. SO#
 - b. SOLI#
 - c. PO#
 - d. POLI#
 - e. Material ID
 - f. Description
 - g. Quantity
 - h. Ship Date (should be in close proximity to the actual received date)

4. Click on the appropriate matching line, to verify that you have chosen the correct commodity.
5. For the commodity being receipted, be sure to accurately enter the:
 - a. Delivery Date (equal the date you received the USDA Foods)
 - b. Bill of Lading Number (BOL) - find on the BOL
 - c. Signatory (name of food bank staff member who signed for the commodities)
 - d. Quantity Received (must match the number of cases on the BOL and the actual received cases)
 - e. Comments (any comments can be typed in this box)
 - f. Check Damage box if commodities are damaged (note that damaged commodities should be refused upon delivery)
6. For damaged commodities, after checking the box, complete the following information:
 - a. Damaged Quantity (number of damaged cases)
 - b. When was the damage discovered? Check one box that apply
 - Before Unloading
 - During Unloading
 - After Unloading
 - c. Was carrier present? (check box, if yes)
 - d. Carrier agent name (driver's name)
 - e. Was refrigerator running (check box, if yes)
 - f. If known applicable to time, check box
 - Unit Temperature
 - Interior Temperature
 - Commodity Temperature
 - g. Description of Circumstances – comment on how the damage occurred.
7. To send the information, click the 'Send Receipt' button. This will open an email on your desktop with the appropriate IDHS email address DHS.IEFP@illinois.gov and form data. Please only send once per receipt. If you encounter difficulties with the form, please call IDHS TEFAP Manager.

See illustration Commodity Receipting of damaged goods below:

*** DO NOT REPLY TO THIS EMAIL ***

Food Bank: ILLINOIS - Anywhere Illinois
 100449 - CEREAL CORN FLKS 1080 PKG-12/18 OZ

Sales Order# 5000307066
 SOLI# 100
 Purchase Order# 4100010699
 POLI# 00011

Railcar / BOL: 28901415
 Signed By: Lori Littleton
 Date Received: 8/2/2016

Comments:

Sales Doc.	Item	Order#	Item	Material	Delivery Point
5000307066	100	4100010699	00011	100449	5002366

Signed by: Greg Lopez Date Received: 8/2/2016 Good Qty (in CS): 1072

Damage: Yes

Damaged Quantity: 8
 Damage Found During Unloading
 Carrier Present: Yes
 Carrier Name: N. Carter
 Description of Damage: Cases were crushed

SERVICE DATA REPORTING

In the Service Data Report via the website www.illinoisfoodbanks.org/login.asp, food banks are required to enter the following data which now requires the number of pounds of food distributed and also to enter excessive inventory of commodities stored in a warehouse over 6 months. Service Data must be completed online no later than the 15th of the following month. See the following illustration:

Wrap up	Edit	Month	Food Stamp Apps	Meals Served	Individuals Served	Households Served	Households Receiving Food Stamps	Percentage of Total Households Receiving Food Stamps	Households Not Receiving Food Stamps	Percentage of Total Household Not Receiving Food Stamps	Pounds of Food Distributed	Cases Stored for 6 Months or More	Last Edited By	Date Edited	Date Completed
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FOLLOW THESE INSTRUCTIONS TO ENTER AND EDIT SERVICE DATA:

Using members link of www.illinoisfoodbanks.org/login.asp, login to the website.

1. In the 'Data Entry' dropdown box, choose 'Service Data.' The new page will contain a SFY dropdown box and a submit button.
2. Choose the state fiscal year you desire to edit or add to and click the 'Submit' button. The new page is a list of your reported activity for the chosen state fiscal year.
3. To edit service data, click the 'Edit' button next to the month you wish to edit. A row of text boxes displaying the information for the chosen month will appear.
4. You will not be able to edit the Month text box. To edit the service data, place your mouse cursor inside the text box that you wish to edit, click the left mouse button one time and use your keyboard to edit the data. Only numbers are permitted in these text boxes.
5. To save your edited information click the 'Update' button. If you have entered any alpha characters into the text boxes, the update will fail and you must try again.
6. To enter a new month's data, first click the 'Add Next Month' button at the bottom of the page. This will display a row of empty text boxes for the next corresponding month.
7. Enter the correct service data in each text box. You must have at least a zero in the text box.
8. Enter the number "0" in the over 6 months column in the service data report, to indicate that there are no USDA Foods in the warehouse that have not been distributed within a six (6) month time frame per the storage time limit requirement.
9. Click the 'Update' button to complete the data entry. This will add the information to the database or give you an error if you incorrectly enter data.
10. IMPORTANT: When you have finished entering your service data and are satisfied that information is correct, click the 'Wrap Up' button next to the month you wish to wrap up. Your Service Report is NOT considered to be complete until you have clicked the 'Wrap up' button.
11. You can tell if a report has been wrapped up by the green text 'Wrap up Complete' in place of the 'Wrap Up' button.
12. Also, to view a report of service data, you may use the 'Reports' dropdown box and choose 'Service Report'. In this screen, choose the SFY and month and a report will appear with the food banks and their service data for the month. food banks that have not wrapped up their reports will be listed below the service data table.

FINANCIAL DATA REPORTING

Financial Data Reports are due and must be submitted via the online system not later than fifteen (15) days after the end of each month. Access the Financial Data Reports from the website www.illinoisfoodbanks.org/login.asp. Browse to the 'members' link and login to the site. Contact your site administrator if you encounter difficulties logging onto the site.

INSTRUCTIONS FOR FINANCIAL DATA REPORTS ARE AS FOLLOWS:

1. After logging on use the 'Data Entry' dropdown box and select 'Financial'. Select food bank, the month, and State Fiscal Year, then click submit.
2. After clicking the 'Submit' button you will see the Financial Report page which is similar to the Excel spreadsheet used for reporting. Enter expenditures in the text boxes.
3. When you have entered all expenditures click the 'Update Expenditures' button at the bottom of the page. This will save your expenditure data.
4. If you need to make amendments and the amendments column is not visible, click the 'Show Amendments' button in the upper side of the page. You must have two amendments which cancel or sum to zero in order to save the changes, i.e., subtract \$500 from insurance and increase mortgage by \$500.
5. Click the 'Update Budget' button at the bottom of the page to save amendments. Any unbalanced amendments will not be updated in the system.
6. If you enter expenditures and amendments at one time and click either 'Update Expenditures' or 'Update Budget', only corresponding entries will be updated, i.e., clicking 'Update Expenditures' will not update amendments.

Note: enter budget amendments to the TANF line item in the amount of five percent (5%) or under the total TANF amount. IDHS approved the use of up to 5% of TANF funds for administrative/distribution costs associated with direct distribution of food purchased with TANF funds. This amendment allows for accounting for the administrative costs.

Completing the Financial Report is achieved by clicking the 'Wrap Up Report' button. Even if all expenditures and amendments are entered and updated, the report is not finalized without clicking the 'Wrap Up Report' button.

Check the system to ensure the report is correctly wrapped up by clicking on the 'Reports' dropdown box and choose 'Financial Reports'. In the screen select the State Fiscal Year and month. If you do not observe your food bank's name in the table with a completion date, the wrap-up has not worked. Please try it again.

(SEE ILLUSTRATION BELOW)

Expenditure Detail	Expenditures July	Expenditures Year-to-Date	Approved DHS Budget	Available Balance
A. Personal Expenditures				
1. Personnel Salaries	\$0.00	\$0.00	\$0.00	\$0.00
2. Personnel Fringe Benefits	\$0.00	\$0.00	\$0.00	\$0.00
Total - Personnel Expenditures	\$0.00	\$0.00	\$0.00	\$0.00
B. Building / Warehouse Expenditures				
3. Building Insurance	\$0.00	\$0.00	\$0.00	\$0.00
4. Maintenance	\$0.00	\$0.00	\$0.00	\$0.00
5. Supplies	\$0.00	\$0.00	\$0.00	\$0.00
6. Rent - Office / Warehouse	\$0.00	\$0.00	\$0.00	\$0.00
7. Mortgage - Office / Warehouse	\$0.00	\$0.00	\$0.00	\$0.00
8. Utilities	\$0.00	\$0.00	\$0.00	\$0.00
9. /	\$0.00	\$0.00	\$0.00	\$0.00
10. /	\$0.00	\$0.00	\$0.00	\$0.00
Total - Building / Warehouse Exp.	\$0.00	\$0.00	\$0.00	\$0.00
C. Equipment and Materials				
11. Computers / Printers / Software	\$0.00	\$0.00	\$0.00	\$0.00
12. Freezers / Coolers	\$0.00	\$0.00	\$0.00	\$0.00
13. Trucks / Vans / Reefer Units	\$0.00	\$0.00	\$0.00	\$0.00
14. Forklifts and Attachments	\$0.00	\$0.00	\$0.00	\$0.00
15. Dollies / Handlifts / Electric Trucks	\$0.00	\$0.00	\$0.00	\$0.00
16. Scales	\$0.00	\$0.00	\$0.00	\$0.00
17. /	\$0.00	\$0.00	\$0.00	\$0.00
18. /	\$0.00	\$0.00	\$0.00	\$0.00
Total - Equipment and Materials	\$0.00	\$0.00	\$0.00	\$0.00

All expenditures must be approved IDHS as either a line item in the food bank's annual budget or through approval of an amendment to the approved budget. Expenditures detailed on the Monthly Financial Report are compared to the approved annual budget to determine their propriety. On-site verification of expenditures is also conducted by IDHS.

BUDGET AMENDMENTS

All budget amendments must be completed within a given time frame online via the website www.illinoisfoodbanks.org/login.asp and/or Community Service Agreement (CSA) Tracking System. Instructions for budget amendments are provided in the instruction for **Financial Data Reporting**.

DISTRIBUTION SITE REPORTS TO FOOD BANKS

Pantries and soup kitchens are responsible for reporting on a monthly basis to the food bank the number of households, individuals, meals served, hours of operation, number of SNAP participants and number of times SNAP information (website or application) was distributed. Proxy Forms [[Exhibit G and H](#)] and Signature Sheets are to be stored on-site at the recipient agency (copies of the Proxy Forms and Signature Sheets are no longer required to be sent to the food bank for additional record keeping).

RETENTION OF RECORDS

All records must be kept for three (3) years from the close of the federal fiscal year to which they pertain. The food bank is responsible for the proper maintenance and retention of all records, including the oversight of records required by the distribution sites. Records must be made available for inspection by USDA, Food Safety and Inspection Service (FSIS), IDHS, and their designees.

Section XI

Prohibited Activities

SALE OF COMMODITIES

USDA and IDHS require agencies to give commodities to eligible households at no charge. Selling commodities, or trading commodities for services, is strictly prohibited. Violators are subject to Federal and/or State prosecution.

POLITICAL ACTIVITY

Political activity in any form is prohibited during commodity distribution. Candidates may not make political appearances at distributions. Campaign literature and signs must not be evident. Bags or boxes advertising candidates or political causes may not be used to carry commodities, and staff may not wear buttons or politically related apparel.

SOLICITATION AND MEMBERSHIP PROHIBITED

Customer may not be solicited for contributions and may not be required to attend or join the organization distributing food. This includes participation in religious services. Eligibility for commodities is based solely on income eligibility and state residency.

COMMODITIES AS COMPENSATION

Volunteers and staff are entitled to federal food only if they meet eligibility requirements. Eligible volunteers and staff may not be given extra food to encourage their help.

CIVIL RIGHTS AND NON-DISCRIMINATION

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, audiotape, 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), via email at Target-Center@usda.gov, or contact the 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 any USDA office, by calling (866) 632-9992, or by writing a letter addressed to FNS at 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. Mailing address:

Food and Nutrition Service, USDA
320 Braddock Place, Rm 334
Alexandria, VA 22314; or

2. Fax: (833) 256-1665 or (202) 690-7442; or

3. Email: FNSCivilRightsComplaints@usda.gov

TEFAP is funded by the Federal government and all contracted food banks and distribution sites must comply with all civil rights and non-discrimination laws. Civil rights and non-discrimination are the cornerstones of USDA policy and must be adhered to at all levels of food distribution.

To comply with Civil Rights requirements, distribution sites must:

- Receive annual Civil Rights and non-discrimination training
- Provide Civil Rights and non-discrimination training to volunteers
- Conduct outreach to under-represented communities
- Display the "And Justice For All" poster
- Accommodate people with disabilities
- Reduce language barriers for people with limited English proficiency (LEP).

Discrimination is prohibited. The "And Justice for All" poster must be posted in clear view of all customers. Reports of alleged discrimination should be called in or mailed to the USDA phone number and/or address listed on the "And Justice for All" poster. The IDHS Complaint Form [Exhibit f] should also be completed and submitted to IDHS.

FOOD DEFENSE PLAN

The Food Safety and Inspection Service (FSIS) requires that all Food banks have a Food Defense Plan in place. Food defense is the protection of food products from intentional adulteration with chemical, biological, physical, or radiological agents. The Agency has developed numerous food defense guidance documents (e.g., model food defense plans, worksheets, checklists, and fact sheets) for consumers, industry, and state and local agencies. All of these materials are available on the FSIS Website at Food Defense and Emergency Response.

AMERICANS WITH DISABILITIES ACT

Title III: Public Accommodations covers businesses and nonprofit service providers that are public accommodations. Public accommodations are private entities that own, lease to, or operate facilities such as: pantries, soup kitchens, and homeless shelters.

Public accommodations must comply with basic nondiscrimination requirements that prohibit exclusion, segregation, and unequal treatment. They also must comply with specific requirements related to architectural standards for new and altered buildings; reasonable modifications to policies, practices, and procedures; effective communication with people with hearing, vision, or speech disabilities; and other access requirements. Additionally, public accommodations must remove barriers in existing buildings where it is easy to do so without much difficulty or expense, given the public accommodation's resources.

Complaints of Title III violations may be filed with the Department of Justice. In certain situations, cases may be referred to a mediation program sponsored by the Department. The Department is authorized to bring a lawsuit where there is a pattern or practice of discrimination in violation of title III, or where an act of discrimination raises an issue of general public importance. Title III may also be enforced through private lawsuits. It is not necessary to file a complaint with the Department of Justice (or any Federal agency), or to receive a "right-to-sue" letter, before going to court. For more information, contact:

- U.S. Department of Justice – (800) 514-0301 (voice)
- Civil Rights Division – (800) 514-0383 (TTY)

The Disability Rights Section of the U.S. Department of Justice, Civil Rights Division address:

U.S. Department of Justice
Civil Rights Division, Disability Rights Section
950 Pennsylvania Ave, NW
Washington, D.C. 20530

The primary goal should be to allow access to the services provided by the site if access to the facilities cannot be achieved.

DISABILITY COMPLIANCE

State agencies, local agencies, other subrecipients must ensure equal access to FNS programs for persons with disabilities. Title II of the Americans with Disabilities Act of 1990 and the ADA Amendments Act of 2008 prohibits discrimination based on disability by state and local governments. The ADA and Section 504 cover issues pertaining to both physical access and program access.

Section XII

Food Bank Service Counties

CIFB

Adams, Bond, Brown, Cass, Christian, Effingham,
Fayette, Greene, Jefferson, Logan, Macon,
Macoupin, Marion, Menard, Montgomery,
Morgan, Pike, Sangamon, Schuyler, Scott, Shelby

EIFB

Champaign, Clark, Clay, Coles, Crawford,
Cumberland, DeWitt, Douglas, Edgar, Ford,
Iroquois, Jasper, Livingston, McLean, Moultrie,
Piatt, Vermilion, Woodford

NIFB

Boone, Dekalb, DuPage, Grundy, Kane,
Kankakee, Kendall, Lake, McHenry, Ogle,
Stephenson, Will, Winnebago

RBFB

Bureau, Carroll, Fulton, Hancock, Henderson,
Henry, Jo Daviess, Knox, LaSalle, Lee, Marshall,
McDonough, Mercer, Putnam, Rock Island, Stark,
Warren, Whiteside

GCFD

Cook

SLFB

Calhoun, Clinton, Franklin, Jackson, Jersey,
Madison, Monroe, Perry, Randolph, St. Clair,
Washington, Williamson

TSFB

Alexander, Edwards, Gallatin, Hamilton, Hardin,
Johnson, Lawrence, Massac, Pope, Pulaski,
Richland, Saline, Union, Wabash, Wayne, White

PAFB

Mason, Peoria, Tazewell

Section XIII

Exhibits - Forms

Exhibit A	Distribution Site Contract	IL444-4041
Exhibit B	Signature Sheet (English version)	IL 444-4511
Exhibit C	Signature Sheet (Spanish version)	IL 444-4511S
Exhibit D	Report of Out-of-Condition USDA Foods	IL 444-2648A
Exhibit E	Commodity Loss Report & Claims Decision Form	IL 444-4040
Exhibit F	Civil Rights/ Discrimination Complaint	IL 444-4530
Exhibit G	Proxy Form (English version)	IL 444-4510
Exhibit H	Proxy Form (Spanish version)	IL 444-4510S
Exhibit I	Federally Funded Equipment Inventory Worksheet	IL 444-4542
Exhibit K	Commodity Complaint Form	IL 444-4531



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100 South Grand Avenue, East • Springfield, Illinois 62762
www.dhs.state.il.us

Programs, activities and employment opportunities in the Illinois Department of Human Services are open and accessible to any individual or group without regard to age, sex, race, sexual orientation, disability, ethnic origin or religion. The department is an equal opportunity employer and practices affirmative action and reasonable accommodation programs.

IDHS IL444-4544 (R-10-23) The Emergency Food Assistance Program Procedure Manual

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