



**My Groceries to Go! Commodity Supplemental Food Program (CSFP)
State Plan of Program Operation and Administration
FFY26**

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I. Purpose and Goals

The purpose of this State Plan of Maryland Department of Human Services Office of Community Grants is to request continued federal support for the Commodity Supplemental Food Program (CSFP) in the State of Maryland. The plan outlines the responsibilities of all parties participating in the My Groceries to Go! Commodity Supplemental Food Program, along with the policies and processes that govern the implementation of the program throughout Maryland.

The Commodity Supplemental Food Program, known in Maryland as *My Groceries to Go!*, works to improve the health of low-income elderly persons (at or below 150% of the Federal Poverty Income Guidelines) at least 60 years of age by supplementing their diets with nutritious USDA Foods. The program is administered at the Federal level by the Food and Nutrition Service (FNS), an agency of the U.S. Department of Agriculture (USDA). The program is authorized under Section 4(a) of the Agriculture and Consumer Protection Act of 1973. Federal regulations covering CSFP can be found in 7 CFR Parts 247 and 250.

In Maryland, the *My Groceries to Go!* Commodity Supplemental Food Program aims to:

- Provide monthly supplemental food to Marylanders age 60 and older living at or below 150% of the federal poverty line.
- Utilize the food distribution as an avenue for low income seniors to access information about nutrition, programs, and services that improve the health and well-being of participants and increase their capacity to apply for and receive benefits for which they are eligible.
- Serve low income older Marylanders in communities with demonstrated need throughout the state.

The goal of Maryland's CSFP has been to expand beyond its original service area of Baltimore City. The current state plan additionally includes the following counties: Baltimore County, Harford, Howard, Anne Arundel, Carroll, Queen Anne's, Montgomery, Prince George's, Allegany and Garrett.

II. Administering Agencies

Reference: §247.3(a)

Citation: CSFP is administered at the Federal level by the Department's Food and Nutrition Service (FNS) which provides USDA Foods, assigns caseload, and allocates administrative funds to State agencies. State agencies are responsible for administering the program at the state level. The State agency may select local agencies to administer the program in local areas of the state. The State agency must provide guidance to local agencies on all aspects of program operations. The state agency may also select sub-distributing agencies to distribute or store

USDA Foods or to perform other program functions on behalf of the State agency. Local or sub-distributing agencies may also elect other agencies to perform specific program functions with the state agency's approval. Although the State agency may select other organizations to perform specific activities, the State agency is ultimately responsible for all aspects of program administration.

Designated State Agency:

Maryland Department of Human Services
Office of Community Grants
Linda Armstrong
25 S. Charles Street, 16th Floor
Baltimore, MD 21201
(410) 767-7077
<https://dhs.maryland.gov/office-community-grants/>

Designated Local Agencies:

Capital Area Food Bank
Marian Peele, Senior Director of CSFP,
4900 Puerto Rico Avenue, NE
Washington, DC 20017
(202) 644-9800
www.capitalareafoodbank.org

The Salvation Army, Central Maryland Area Command
Captain Krisan Mockabee, Area Commander
814 Light Street
Baltimore, MD 21230
(410) 469-2527
www.sa-md.org

Allegany County Human Resources Development Commission (AHRDC)
Carralee Silka, Director
125 Virginia Avenue
Cumberland, MD 21502
(301) 777-5970
<https://alleganyhrdc.org/>

The Office of Community Grants (OCG) is the designated State Agency for the Commodity Supplemental Food Program (CSFP) for the State of Maryland. OCG is responsible for all state level program operations including, but not limited to: providing guidance on program operations, monthly reporting to FNS, fiscal compliance and auditing; these responsibilities are further outlined in detail in later sections of this State Plan.

OCG will work in partnership with The Salvation Army Central Maryland Area Command (TSA), Capital Area Food Bank (CAFB) and Allegany County Human Resources Development Commission (ACHRDC). These agencies will be referred to as the “local agency” or “local agencies” throughout the state plan. These agencies are leaders in the movement to end hunger in the state of Maryland with experience and expertise in serving low income individuals and seniors through CSFP and other programs.

III. Agreements

Reference: §247.4

Citation: Each State agency must enter into an agreement with FNS prior to receiving funds. The state agency must enter into written agreements with local or sub-distributing agencies prior to making USDA Foods or administrative funds available to them. Copies of all agreements must be kept on file by the parties to the agreements.

The Maryland Department of Human Services has entered into agreements (Attachment B) with TSA, CAFB, and ACHRDC. The agreements contain assurances that the local agencies shall be in charge of the following major responsibilities and functions:

- (a) Administer the program in accordance with Federal regulations;
- (b) Maintain complete, accurate records for a period no less than three (3) years from the close of the fiscal year to which they pertain, or, if they are related to unresolved claims actions, audits, or investigations, until those activities have been resolved.;
- (c) Be responsible for any loss resulting from improper distribution, storage, care or handling of USDA Foods;
- (d) Be responsible for any misuse of program funds;
- (e) Clearly state specific functions the State delegates to another agency;
- (f) Specify that either party may terminate the agreement by giving written notice of that fact at least 30 days in advance;
- (g) Provide nutrition education and information on other health, nutrition, and public assistance programs to participants;
- (h) Distribute USDA Foods in accordance with approved food package guide rate;
- (i) Take required steps to prevent dual participation;
- (j) Maintain a list of names and addresses of all certification, storage, and distribution sites under the jurisdiction of the local agency;
- (k) Treat all persons equally, free from discrimination on the grounds of race, color, national origin, age, sex, or disability.

Agreements will be maintained on file at the OCG office and available upon request. In the following section of this Plan, we detail how the responsibilities outlined above will be met.

IV. State and Local Agency Responsibilities

Reference: §247.5

Citation: The State agency may delegate some responsibilities to another agency; however, the State agency is ultimately responsible for all aspects of program administration.

The State agency will be responsible for the following:

- (a) Completing and submitting the state plan;
- (b) Selecting local agencies to administer the program throughout the state;
- (c) Determining and submitting caseload needs to FNS;
- (d) Assigning caseloads to local agencies;
- (e) Establishing a financial management system that accurately tracks funds received for program administration;
- (f) Establishing a management review system and conducting reviews of lead local agencies annually;
- (g) Establishing eligibility guidelines in accordance with Federal regulations;
- (h) Establishing procedures to effectively monitor for dual participation;
- (i) Establishing appeal and fair hearings procedures for local agencies and program participants;
- (j) Establishing standards for the pursuit of claims against participants;
- (k) Ensuring that average program participation does not exceed the caseload allocation on a quarterly basis.
- (l) Ensuring compliance with all CSFP Federal requirements; and,
- (m) Providing guidance to local agencies as needed.

The State agency delegates some responsibilities associated with CSFP operations to another agency. These responsibilities are clearly stated in the agreement between the two (2) parties.

Local agencies are responsible for the following functions:

- (a) Determine an applicant's eligibility in accordance with Federal regulations and the State Plan;
- (b) Comply with all program policies and procedures, fiscal and operational requirements established by the OCG;
- (c) Order foods and manage process of shipping, collecting, packaging, and distributing foods to participants on a monthly basis in accordance with the established food package guide rates;
- (d) Ensure that participation does not exceed monthly caseload;
- (e) Give food to participants in accordance with food package guide rates;
- (f) Provide nutrition education and information regarding other public health assistance programs;
- (g) Inform applicants of their rights and responsibilities;
- (h) Meet special needs of the homebound elderly;
- (i) Pursue claims against participants
- (j) Enter into signed agreements with distribution sites following the administration of a pre-award civil rights questionnaire; and
- (k) Provide training for participating staff and monitoring of distribution sites.

All USDA food items available to Maryland under the CSFP will be ordered monthly by the local agency in consultation with the OCG and shipped to storage sites designated by the local agency and approved by the OCG. Ordering must be completed through the USDA WBSCM online system.

Orders placed will be based on the previous month's physical inventory balance, USDA foods available, and the projected number of participants. The totals will be combined into full-truck equivalents planned for delivery to the local agency warehouse prior to the scheduled issuance month. Local agencies will directly receive, warehouse, and manage CSFP foods. Inventory will be continuously rotated and stock will be handled on a first-in first-out basis. Individual food packages will be pre-packed at the warehouse. Local agencies will deliver food to selected sites throughout the state. The food packages will be distributed to participants according to food package guidelines.

Local agencies will be responsible for safeguarding CSFP foods from theft, spoilage, damage, destruction or other loss. Facilities used to store CSFP food must be approved in advance by OCG. OCG will conduct annual inspections to ensure that the local facility is safe, secure, sanitary, and that foods are stored at appropriate temperatures.

OCG will conduct announced or unannounced visits to the local agency and their delivery sites to monitor for adherence to program regulations. An administrative review of the agency's CSFP correspondence, caseload records management, participant certification and notification procedures, nutrition education, outreach, record keeping, and civil rights compliance will be performed. OCG will ensure that the local agency is aware of monitoring protocol which includes:

- a full physical check of the CSFP inventory on an annual basis
- inspection of the premises;
- on-site discussion of review findings with the local agency;
- specified time frame for submitting a review report with findings and corrective action required (if applicable);
- specified time frame for agency's submission of corrective action plan;
- evaluation of corrective action plan submitted;
- follow-up with the local agency to ensure corrective action measures have been implemented.

The local agency will be the consignee for all food items delivered by USDA. The local agency is responsible for the proper storage and handling of all USDA Foods received and will inspect shipments of food upon arrival for condition, temperature, damage, and infestation, and verify accuracy of count and satisfactoriness. The local agency must ensure 2-3 months' commodity supply is on hand at any given time to ensure sufficient, but not excessive inventory, defined as inventory of more than 3 months' supply without prior approval from OCG and USDA.

An annual physical inventory will also be conducted as required by CSFP regulations. When damaged or substandard foods are identified, staff should immediately notify OCG, who will then notify the CSFP contact at FNS who will review the situation. The damaged or substandard foods will be removed from the storage inventory and disposed of through appropriate means.

No food shall be destroyed or disposed of without prior authorization from the local agency or USDA.

Disposition logs will be maintained by local agencies and forwarded to OCG as needed. Local agency distribution locations will be informed regarding the importance of and the methods for handling and storing CSFP foods in a safe and secure manner.

The local agency maintains warehouseman's legal liability insurance in an amount adequate to cover any losses arising from its failure to exercise reasonable care and responsibility required by law and imposed by contract including, but not limited to, spoilage caused by failure to rotate stock. Minimum coverage requirements are determined based on the average quantity of CSFP foods stored at specified warehouse locations and any such provisions of the State of Maryland's standard state contract.

The local agency agrees to receive, warehouse, maintain accurate inventory records for storage of CSFP foods and will be responsible for CSFP operations including, but not limited to, certification and food distribution, as well as all Local Agency responsibilities outlined in the above regulations.

The local agency administers several aspects of the program on behalf of OCG, carrying out all local agency-required tasks for successful program administration. The local agency stores and distributes USDA Foods directly to participants via adherence to the approved food package and maintains all aspects of obtaining and tracking participant applications, proxy verifications, denial of service determination, and fully informs actual and potential participants of the program's anti-discrimination policies and appeals processes. The local agency will be responsible for any losses resulting from improper distribution, storage, care or handling of USDA Foods and be responsible for any misuse of administrative program funds which are granted to them by the OCG.

Distribution of the Commodity Food Package

The State Agency's distribution method uses the local agency community network, and leverages existing OCG partners (eg, Area Agencies on Aging, senior centers) to access and distribute food to Maryland's target areas and populations. Specifically, OCG contracts with the local agency to receive, warehouse, and distribute CSFP food to senior housing and senior and community centers, and other local organizations where older adults congregate.

CSFP foods will be distributed by the local agency through group or home delivery via direct service at predetermined delivery sites locations, created in partnership with OCG. A list of 2022 distribution sites can be found in Attachment E. Individual food packages are pre-packed at the warehouse and shipped to the distribution sites or participants. The participant or authorized proxy will sign a food issuance document, and then receive their food package. Any refusals are noted in the database, deducted from the food package received, recorded on the issuance document and returned to inventory. ID verification procedures are utilized during the application and box pickup processes.

Resolving Program Complaints

Program participants may address a complaint concerning program operations, program staff or food quality to the local agency, in person, in writing, or by telephone. Contact numbers are included on program information distributed to participants upon enrollment or re-certification. In addition, the USDA toll-free number will be provided to participants should they wish to make a direct complaint. Individuals will be advised of any actions that may be taken to resolve the stated problems.

Program complaint forms will be available on request. Oral complaints will be accepted and will be recorded on the complaint forms by the State or district office receiving the complaint. Anonymous complaints will be discouraged; however, such complaints will be investigated at the receiving administrator's direction. The local agency will investigate complaints received within 30 days of receipt and subsequently report findings to OCG within 60 days of receipt of the complaint. Any complaint or problem not resolved will be forwarded to USDA for review. Distribution sites and the local agency will work in conjunction with OCG to guarantee that complaints involving CSFP products will be recorded on the aforementioned form.

Process for Serving Homebound Elderly

In order to make the CSFP accessible to eligible individuals who are physically unable to pick up their benefits, local agencies will utilize proxies at all distribution sites or arrange home delivery. Eligible participants who are unable to attend distributions may designate up to 2 proxies to accept and deliver her/his My Groceries to Go! monthly food package on the application. To comply with CSFP Federal regulations, the applicant must provide the required application information for verification outlined in the certification section. The applicant's proxy must also provide proof of identification at the time of collection of the monthly food package.

After the CSFP application and certification have been completed, a participant may at any time request to name a proxy by contacting the local agency or the CSFP Authorized Representative at their distribution site. A non-designated proxy may pick up a box for a program participant by providing their ID and the participant's ID. Proxy information should be updated before the following distribution.

If necessary home delivery services can be arranged through a local agency partner, staff or social service agencies serving the homebound elderly. Training will be provided for volunteers or staff of agencies providing home delivery services. Training will include general information regarding the purpose of the CSFP, basic policies and procedures, appropriate handling of food packages between pickup and delivery, home delivery services, and information on who to contact with questions and/or concerns.

V. State Plan

Reference: §247.6

Citation: A document submitted by the State Agency outlining the procedures it will follow in the administration of the CSFP.

In developing the State Plans annually, OCG will request input on ways to increase CSFP participation if caseload levels are not met, and will also examine the effectiveness and efficiency of the CSFP distribution process. Input will be requested throughout the program year from local agencies, participants, distribution sites, and other partners.

VI. Outreach Efforts

Reference: §247.6

Citation: Develop and implement a process by which the State and local agencies partner with organizations within the community to educate the targeted population about the CSFP.

The Salvation Army and Capital Area Food Bank have experience and expertise working directly with low-income seniors through SNAP outreach and the “Groceries Plus” CSFP in Washington D.C. Allegany County HRDC is experienced in working with low income populations, including seniors, to provide a range of needed services, including food and social services support. The local agencies will draw upon these existing programs and associated networks as sources of outreach to potentially eligible applicants. The OCG and local agencies will also maintain visible and up-to-date information about My Groceries to Go! CSFP on their respective websites.

VII. Certification Criteria and Procedures

Reference: §247.8 - 247.9, 247.13, 247.15

Citation: Eligibility for CSFP participation will be determined based on Federal regulations governing the Program and upon completion of a certification form developed by the State agency and approved by the Food and Nutrition Service Regional Office (FNSRO).

A copy of the application and participant agreement certification form can be found in Attachments C and D. Applicants must verify their name, age, address, using the following acceptable forms of identification. Income must be reported by each applicant and certified to be within eligibility guidelines by a CSFP staff member or trained volunteer. Older adults applying for the CSFP program must be 60 years of age or older and live at or below 150% of the federal poverty line, based on household size. Current income guidelines can be found in Attachment F. The household size must be identified on the application.

- a. Acceptable forms of personal identification include:
 - i. For Enrollment: Any form of government-issued ID that verifies name and age/date of birth. The ID may be past the original expiration date. Examples include: a license, state ID, passport, alien registration or residency card, social security card, voter registration, birth certificate, and military record.
 - ii. For Box Pick-Up: Any of the aforementioned forms of ID or a building ID or an MTA Mobility card.
- b. Acceptable forms of proof of residence (if current address not on ID) include:

- i. Any aforementioned form of personal identification that includes the current address, bill (medical, cable, credit card, utility), bank account statement, pay stub, SSI check, vehicle registration, benefits award letter, housing authority ID card, lease, signed letter from a landlord; social security letter

The application form includes a nondiscrimination statement informing the applicant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability. Participants will review verbal and written information from local agency staff concerning their rights and fair hearings when certification documents are signed.

Once the information is completed and confirmed, a determination of eligibility is made based on the criteria provided and in compliance with CSFP regulations. Applicants will be notified of eligibility/ineligibility within 10 days of the date of application. Applicants determined to be ineligible will be notified in writing. The notice of ineligibility statement will inform the applicant of his/her right to a fair hearing to appeal this decision

A full participant certification will take place every three years. A simplified re-certification will take place every 12 months, during which participants will be asked to verify that the:

- address has remained unchanged
- income still meets the eligibility guidelines
- individual still wished to take part in the program

If any of these points cannot be verified, a full certification process must be administered.

The local agency must notify program participants in writing at least 15 days before the expiration date that eligibility for the program is about to expire. The notification must be accompanied by the nondiscrimination statement.

As outlined in section IV. State and Local Agency Responsibilities, up to 2 proxies may be included on the application to ensure that the program meets the needs of participants unable to leave their homes. In this case, the applicant must provide the required application information for verification. The applicant's designated proxy must also provide proof of identification at the time of collection of the monthly food package. A participant may at any time request to name a proxy by contacting the local agency or the CSFP Authorized Representative at their distribution site.

If a significant portion of CSFP applicants are non-English or limited English speaking people, the local agency must ensure that application and program information is provided in the appropriate language.

All certification and waitlist processes may be completed using appropriate software in place of paper forms, including the use of electronic signatures. If software is used, applications must match the active application form in both content and format when printed.

VIII. Discontinuance/Ineligibility of Participant's CSFP Benefits

Reference: §247.12, 247.17

Citation: The local agency is responsible for notifying an applicant/participant when benefits are denied or discontinued due to fraudulence, ineligibility, or lack of USDA Foods.

If an applicant is determined to be ineligible for CSFP benefits, it is the responsibility of the local agency to notify the individual of that fact and provide them with information regarding his/her right to appeal this decision by requesting a fair hearing. If a participant is no longer eligible to receive CSFP USDA Foods, the local agency will provide the participant with written notification of discontinuance at least 15 days prior to the effective date of discontinuance. The written statement contains information on the participant's right to a fair hearing to appeal this decision. Detailed information regarding fair hearing procedures is provided in section XVIII Fair Hearings.

Ineligibility and discontinuance may be due to fraudulent activities. Any participant found guilty of committing fraudulent activities, including selling CSFP USDA Foods, exchanging USDA Foods for goods, participating in more than one CSFP site at once, intentionally making false or misleading claims about USDA Foods, or intentionally withholding information about CSFP USDA Foods, can be disqualified up to one year from receiving CSFP benefits, unless disqualification would result in a serious health risk. Participants who have been found to commit three program violations involving fraud will be permanently disqualified from receiving benefits. In cases of fraud that result in a loss of \$300 or 6 months' food (based on an estimated cost of \$50 per month for CSFP food), the local partner must investigate whether to pursue a claim against the participant. In pursuing a claim against a participant, the local agency must:

- Issue a letter demanding repayment for the value of the USDA Foods improperly received or used;
- If repayment is not made in a timely manner, take additional collection actions that are cost-effective, as determined by the state; and
- Maintain all records regarding claims actions taken against participants.

IX. Distribution and Use of CSFP USDA Foods

Reference: §247.10

Citation: The requirements for distributing USDA Foods to eligible CSFP participants and the methods used to accomplish this task.

The food package will be pre-determined according to established FNS food package guidelines. The local agency will distribute one package of USDA Foods to each participant on a monthly basis. Participants receive food packages by self pick-up, group pick up, or home delivery. All participants and/or proxies must present identification before receiving their food package.

In order to make the CSFP accessible to eligible individuals who are physically unable to pick up their benefits, distribution sites are encouraged to promote the use of proxies and arrange home

delivery to the extent that resources permit. As outlined in section IV. State and Local Agency Responsibilities, a non-designated proxy may pick up a box for a program participant by providing their ID and the participant's ID, but proxy information should be updated before the following distribution.

Distribution sites operate on a limited basis during designated hours. Sites will establish regular operating times and share this information with the local agency, who will in turn share with the Maryland Department of Human Services. If distribution sites wish to change their hours of operation, the request must first be approved by the local agency and the OCG must be updated immediately.

The local agency must implement a system to adequately track participants at all sites on a monthly basis and provide this information monthly via the FNS-153 submission.

X. Applicants Exceed Caseload Levels

Reference: §247.11

Citation: Local agencies are required to maintain a waiting list of applicants when caseload levels have been reached.

Once the assigned maximum CSFP caseload has been reached, additional applicants will be placed on a waiting list. The waiting list will include the name, address, telephone number of the applicant, the date of the initial application, and date the applicant was notified of waiting list status. A sample waiting list form can be found in Attachment G. The local agency must notify eligible applicants within 10 days of their request for benefits. The local agency will maintain the wait list. When caseload space becomes available, the local agency will contact eligible applicants in priority order based on date of application.

XI. Nutrition Education

Reference: §247.18

Citation: The State agency will create and implement a nutrition education plan in accordance with CSFP regulations. Evaluation procedures will be established to allow participants to provide feedback as to the effectiveness of the plan.

OCG sets standards for nutrition education, reviews nutrition education materials and approaches, ensures the quality of nutrition education resources, and establishes a standard evaluation and participant feedback tool which is delivered at the local level and reviewed at the state level.

Local agencies are required to provide nutrition education to its participants and to their proxies on a quarterly, or more frequent, basis. Local agencies shall work with Area Agencies on Aging (AAAs) and the Food Supplement Nutrition Education (FSNE) as well as federal, state, and local (including their own agency) resources, to secure pre-printed materials, educational displays and/or live demonstrations provided by qualified professions or organizations. The impact of education efforts will be evaluated annually using a tool provided by the Department.

Nutrition education will include the following information and account for specific ethnic and cultural characteristics whenever possible:

- The nutritional value of CSFP foods, and their relationship to the overall dietary needs of the population groups served;
- Nutritious ways to use CSFP foods;
- Special nutritional needs of participants and how these needs may be met;
- The importance of health care, and the role nutrition plays in maintaining good health; and
- The importance of the use of the foods by the participant to whom they are distributed, and not by another person.

Local agencies are required to request participants evaluate the effectiveness of nutrition education materials and/or activities by responding to a customer satisfaction survey provided at the time of their CSFP food package distribution. The survey tool is developed by OCG and includes the participation of a nutritionist or qualified evaluation professional. Completed surveys will be mailed, submitted via hardcopy, entered into a software program, or other feasible mechanisms, including via phone survey, for OCG analysis of statewide feedback. Nutrition education topics and approaches will be driven in part by any trends and concerns that are noted in the customer satisfaction survey.

XII. Dual Participation

Reference: §247.19

Citation: The State agency and local agencies are responsible for monitoring CSFP to prevent dual participation.

As part of certification, the local agency, or distribution site staff trained by the local agency, must ensure that participants are informed and understand that they may not receive CSFP benefits at more than one distribution site at the same time or be served more than once per month. A statement is included in the participant agreement. An additional check of electronic records must be performed every 6 months by the local agency to ensure dual participation is not taking place.

If dual participation is discovered, the local agency will notify the participant in writing of discontinuance and include information on his/her right to a fair hearing to appeal the decision. If dual participation is due to false and/or misleading statements or intentionally withholding information, the local agency must disqualify the participant from receiving CSFP benefits unless the disqualification would cause a serious health risk to the individual. The local agency will initiate a claim to recover the value of benefits that were wrongly received.

XIII. Caseload Assignment

Reference: §247.21

Citation: FNS will assign a caseload to the State agency for distribution to eligible participants on a yearly basis.

According to CSFP regulations, FNS will assign a caseload amount to the State Agency allowing eligible persons to participate in the program up to the caseload limit. FNS will make a determination based on the following factors:

- the percentage of caseload utilized by the State in the previous fiscal year;
- program participation trends in prior fiscal years.

The Maryland My Groceries to Go! CSFP achieved an average monthly caseload of 3,410 during FY24, an average of 98% of the FY24 caseload of 3,469. This caseload represents a decrease in participation from recent years. This can be attributed to unusual circumstances during the fiscal year as detailed in the attached cover letter to this State Plan. The Department is requesting to maintain a caseload of 3,469. This would be assigned to local agencies as follows:

- 1,819-person caseload in Baltimore City in partnership with The Salvation Army, to continue serving participants in the Baltimore metropolitan region.
- 1,300-person caseload in partnership with Capital Area Food Bank, with cases served in Montgomery County, MD and Prince George's County, MD.
- 250-person caseload in Allegany County in partnership with the Allegany County Human Resources Development Commission.

Capital Area Food Bank Caseload Expansion Request

In FY25, Capital Area Food Bank (CAFB) will continue to serve a total of 1,300 persons in Prince George's and Montgomery Counties.

The Salvation Army – Service in Baltimore

In FY25, The Salvation Army will serve a caseload of 1,819 active participants in the Baltimore Metropolitan Area, including Baltimore City, Baltimore County, Carroll County, Harford County, Howard County, Anne Arundel County, and Queen Anne's County.

Allegany County Human Resources Development Commission

The Allegany County HRDC will continue service to a caseload of 250 participants in Allegany County for FY25.

XIV. Use of Administrative Funds

Reference: §247.22 – 247.26

Citation: USDA will allocate administrative funds in the form of a grant to the State Agency to be used for CSFP administration. These funds may be used for costs associated with the efficient and effective administration of the program.

Funds to support the CSFP received by OCG from the USDA are deposited into a restricted account in the State treasury. CSFP finances are administered by OCG through the Department of Budget and Management (DBM) and a specific accounting system is maintained to record

financial transactions related to CSFP. Accounting procedures for program funds adhere to policies and practices established by the Maryland's Comptroller's Office which provides a uniform automated accounting system to all departments and agencies within state government. DBM establishes a unique appropriation identifier number and assigns a number to each program to allow separate financial accounting by program. In addition, there are object codes which classify types of expenditures. The Comptroller's Office also assigns a unique vendor number to each entity to whom payments should be made. This accounting system maintains all expenses by the fiscal year in which the expense was incurred.

Local agencies will ensure that their payroll systems require employees to submit time reports showing the number of hours worked on specific programs during the pay period. Similarly, local agencies will ensure that employee expense reporting procedures require that expenses reported for mileage or other allowable costs in the performance of CSFP duties must be identified separately from expenses not directly related to the CSFP

Local agencies will seek approval from USDA FNS through the OCG prior to the purchase of any data management systems, capital expenditures over \$5,000 and management studies performed by outside consultants under contract with the State. Local agencies will report any spending directly to OCG as required by the State-Federal agreement (Form FNS-74).

Administrative funds available to local agencies will be managed by the OCG. At the discretion of the OCG, and as allowed by the USDA, funds designated to the state may be retained in part by the state as outlined in CFR 247.23. Payments of administrative expenses will be made through the OCG fiscal office. Local agencies, in accordance with proper budgeting practices, will submit an inclusive report to the OCG for reimbursement.

If OCG has not obligated all of its allocated administrative funds, the unobligated funds must be returned to FNS.

Annual expenditure reports will be submitted by OCG and local agencies as required by the USDA.

XV. Financial Management

Reference: §247.27

Citation: The financial management system used will provide accurate, current and complete disclosure of the State's program, including an accurate accounting of all administrative funds received and expended.

The OCG and the local agencies are responsible for maintaining a financial management system that complies with Federal regulations. This financial management system must provide accurate, current, and complete disclosure of the financial status of the CSFP including funds received and expended each fiscal year.

Additional requirements include:

- prompt and accurate payment of allowable costs;

- timely and appropriate disbursement of funds to local agencies;
- timely and appropriate resolution of claims and audit findings;
- proper maintenance of records identifying the use of administrative funds.

XVI. Reports and Recordkeeping

Reference: §247.29

Citation: The State Agency is responsible for maintaining accurate and complete records for all aspects of the CSFP. Monthly reports must be completed and submitted to the USDA within specified time frames.

The State Agency must maintain accurate and complete financial and administrative records pertaining to all CSFP functions as required by Federal regulations.

These include, but are not limited to, the following:

- receipt, disbursement, disposal, and current inventory of USDA Foods;
- receipt and disbursement of administrative funds;
- claims due to the improper distribution of, use of, loss of, or damage to USDA Foods and the results obtained from pursuit of these claims;
- eligibility determinations;
- fair hearings.

The State Agency is required to submit the following reports to USDA within specified time frames:

- Financial Status Report (SF-425)
- Monthly CSFP Report and Quarterly Administrative Financial Status Report (FNS-153)
- Racial/Ethnic Group Participation (FNS-191)

Local agencies are required to report the following within specified time frames:

- Annual Budget
- Monthly report of commodity inventory and management and participants served via electronic copy of the FNS-153
- Annual Racial/Ethnic Group Participation in April via electronic copy of the FNS-191
- Quarterly financial reporting
- Monthly payment invoicing
- Quarterly Distribution Site Tracker
- Quarterly Education Tracker (nutrition education materials and activities, along with any other educational materials provided to participants)

XVII. Audit Procedures

Reference: §247.31

Citation: A description of the audit procedures, including a description of the scope and frequency of audits of the State agency and local agencies, and a delineation of the procedures used to assure audit examination of the CSFP at a reasonable

frequency. Audit agency guidelines for selecting a sample of grant programs for audit should be addressed.

State and local agency audits must be conducted according to USDA, FNS regulations pertaining to audits of States, local governments, and nonprofit organizations. USDA, FNS may conduct an audit of the CSFP at the State or local agency level at its discretion. The purpose of the audit is to ensure that applicable laws, regulations, and administrative requirements are followed. It is the responsibility of the State agency to provide access to any documents and records necessary to review the financial and administrative operations of the Program.

Upon completion of the audit, FNS will issue a Management Evaluation Review (MER) to the State detailing any findings and/or recommendations resulting from the audit. It is the State's responsibility to submit a response to all audit findings and/or recommendations. The corrective action plan must address all program deficiencies identified, actions to be taken to correct the deficiencies, and a time frame for implementation. FNS will determine if the State has adequately addressed the program deficiencies identified.

XVIII. Fair Hearings

Reference: §247.33

Citation: A process by which CSFP applicants/participants can appeal an adverse action which results in the denial or loss of benefits.

Individuals seeking continued benefits may request a fair hearing within 60 days of the date of the notice of termination. Any participant denied benefits at re-certification time or found ineligible during a certification period and who requests a fair hearing within 15 days of notice of termination shall continue to receive benefits until a hearing official reaches a decision or the certification period expires, whichever comes first. An applicant who is denied benefits at the time of certification will not receive benefits before a hearing official makes a determination.

Conduct for the fair hearing, including all notifications, is the responsibility of OCG. The OCG will establish clear, simple rules and procedures regarding the fair hearings process. OCG will notify CSFP participants/applicants of denial of benefits in writing. The letter will outline information needed for a fair hearing and define the rights and responsibilities of all parties involved.

All fair hearings must be conducted by an impartial official who does not have any personal stake or involvement in the decision and who was not directly involved with the initial determination.

The Hearing Officer will:

- Ensure that hearings are scheduled within three weeks of the date the initial request is received in the district office;
- Provide written notice of the place and time of the hearing at least 10 days prior to the hearing date and include the rules of procedure for the hearing;

- Ensure all relevant issues are considered;
- Administer oaths of affirmations as required by the State;
- Request and receive all evidence determined necessary for the hearing;
- Regulate the conduct and course of the hearing consistent with due process;
- Order, where relevant and necessary, an independent medical assessment or professional evaluation from a source mutually satisfactory to the appellant and OMB;
- Render a decision which will resolve the dispute within 45 days of the initial request for a hearing.

Once a decision has been reached, written notification must be sent to the individual explaining the reasons for the decision. If the Hearing Officer rules in favor of the participant, then benefits will continue as scheduled. If the hearing decision is in favor of an applicant who was denied benefits, receipt of USDA Foods must begin within 45 days from the date that the hearing was requested as long as the applicant is still eligible. If the hearing decision is against the participant, benefits will be discontinued as soon as possible.

A request for a fair hearing may be denied for the following reasons:

- The request is not received within 60 days from the date the district office mails or gives the participant/applicant the notice of adverse action;
- The request is withdrawn by the appellant or representative in writing;
- The appellant fails to appear at the hearing without good cause.

XIX. Civil Rights

Reference: §247.37 (a), FNS Instruction 113-1

Citation: State and local agencies must comply with the requirements of Title VI of the Civil Right Act of 1964, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975; and titles II and III of the Americans with Disabilities Act of 1990. State and local agencies must also comply with the Department's regulations on non-discrimination and with the provisions of FNS Instruction 113-2, and the 7CFR Part 15 including racial and ethnic participation data and public notification of non-discrimination policy.

The certification form includes a section where the applicant can indicate a self-identified racial/ethnic category which will be kept on file for all participants. Racial/ethnic categories are as follows, based on Attachment B of the FNS-191 USDA form:

Ethnicity:

- Hispanic or Latino

Race:

- American Indian or Alaskan Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander

● White

Local agencies will display USDA nondiscrimination posters at the local agency office and at the distribution sites. Local agencies may also supply USDA nondiscrimination posters, or a USDA-approved substitute, to other locations such as clinic waiting rooms, CSFP nutrition education activity sites or food warehouses frequented by CSFP participants and applicants. Local agencies ensure that the nondiscrimination policy statement and civil rights complaint procedure are included in any CSFP vendor contracts, brochures, newsletters, posters, media announcements, and application or certification forms. Where a significant portion of the CSFP-eligible population is non-English speaking or limited-English proficient persons, local agencies will ensure that program information is made available in the appropriate language, either orally or in writing.

Local agencies ensure that individuals associated with CSFP operations are informed regarding civil rights procedures. Any complaint received by a local agency or distribution site alleging discrimination based on race, color, national origin, age, sex, or disability will be documented and reported immediately to OCG. OCG will forward any complaint alleging discrimination to the FNS Civil Rights Division within 5 calendar days, who will process and investigate as they deem necessary.

Civil Rights activities of participating agencies will be reviewed at least once a year by either OCG or the local agency as part of the CSFP management review process. This review will include confirmation that nondiscrimination posters are displayed, and that the civil rights policy and discrimination complaint process appear in any public announcements, newsletters, posters, brochures or other media used to provide CSFP information to the public. Where applicable, the civil rights compliance review will determine if appropriate bilingual staff, volunteers or other translation resources are available to serve applicants and participants, and that rights and responsibilities on the certification form are read to or by applicants and participants in the appropriate language. The local agency will review racial/ethnic enrollment data, denied applications, waiting lists, complaint reports and participant surveys to ensure that their staff operates in a nondiscriminatory manner. OCG has the right to investigate or review local agency documentation upon request to determine if the agency is meeting the requirements of the CSFP.

Attachments:

The following attachments are included as part of this state plan:

- A. FNS-74 Federal-State Agreement
- B. Grant Agreement between Maryland Department of Human Services and the local agency
- C. CSFP Application Form
- D. CSFP Participant Agreement
- E. 2024 distribution sites
- F. Current Income Eligibility Guidelines
- G. Example waiting list form