COMMODITY DISTRIBUTION PROCEDURES HANDBOOK

OKLAHOMA
OKDHS
EXCELLENCE

OKLAHOMA DEPARTMENT OF HUMAN SERVICES

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CHAPTER 1
INTRODUCTION

The United States Department of Agriculture's (USDA) Food Distribution Program (FDP) is designed to improve the diets of program participants and support agriculture through removing surplus food and supporting farmers. State distributing agencies (SDA) receive the food to distribute to eligible organizations such as schools, child and adult day care centers, residential child care institutions and charitable institutions.

The Oklahoma Department of Human Services (OKDHS) Commodity Distribution Unit (CDU) serves as the SDA for USDA commodity foods. CDU receives and stores USDA commodity foods and then distributes the foods to recipient agencies (RAs).

This handbook is designed to present the program in an easy to understand format. Each section deals with a specific area of the program. The forms section contains blank forms to use as needed.

When significant policy and program changes occur, the information will be provided to you as soon as possible. The forms section will be updated as needed. The USDA Commodity Price List is updated and had previously been mailed to RAs on an annual basis. This will be posted on the OKDHS web site (www.okdhs.org) beginning July 1, 2003. Scroll to the commodity web page.

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CHAPTER 2
LEGAL BASIS FOR USDA DONATED FOODS PROGRAM

The USDA Donated Foods Program, commonly called commodities, began during the 1930s. Congress enacted legislation that allowed the United States government to purchase "surplus commodities" from the open market and to redistribute these foods to persons in low income groups.

The regulations for USDA Commodities are found in the Code of Federal Regulations (CFR) Chapter 7.

CHAPTER 3
DEFINITIONS

The following definitions are taken from 7 CFR Chapter 11, Food and Consumer Service, USDA.

ASSESSMENT FEE - a fee charged to recipient agencies (RAs) to assist the state with administrative costs associated with ordering, storing and distributing commodities.

BACKHAUL - transporting commodities from storage in a recipient agency warehouse to a processor for production of an end product such as USDA chicken into chicken nuggets. CDU does not permit backhauling from the state warehouse facility.

BONUS COMMODITY - a commodity that is not charged against the state's entitlement and the recipient agency's planned assistance level amount.

CHARITABLE INSTITUTION - a non-penal, non-educational public institution. (Penal institutions are defined under JAIL in this section. They can participate as a charitable institution, but are not eligible for TEFAP foods.) A non-profit, tax-exempt, private hospital, or, any other non-profit, non-educational, tax-exempt private institution, such as hospitals and facilities caring for needy infants and children, organized to provide charitable or public welfare services in the same place without marked changes and meeting a definite need in the community by providing a regular meal service. Charitable institutions include any institution defined as "service institution;" "non-residential child care institution;" or "school" that is not a commodity school or does not participate in a child nutrition program.

CHILD NUTRITION PROGRAMS (CNP) includes the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP) for Children, the Child and Adult Care Food Program (CACFP) and After School Snack Program.

COMMODITIES - foods provided to the states by USDA for distribution to eligible recipient agencies.

COMMODITY DISTRIBUTION UNIT (CDU) -The Oklahoma Department of Human Services (OKDHS) staff that manages the Food Distribution Program.

DISASTER ORGANIZATION - an organization authorized by federal or state officials to help victims of a major disaster or emergency.

EMERGENCY - a catastrophe in any part of the United States that requires federal emergency assistance to supplement state and local efforts to save lives, protect property, health, and safety, or avert or lessen the threat of disaster.

END PRODUCT DATA SCHEDULE - a form used by a food processor to describe the finished end product.

ENTITLEMENT COMMODITY - a USDA donated commodity that is charged against a recipient agency's planned assistance level.

FISCAL YEAR - the state or federally set dates under which a program operates.

FOOD BANK - an institution that provides food to pantries, soup kitchens, hunger relief centers or other feeding centers that gives meals or food to needy persons on a regular basis as an integral part of its normal activities.

FOOD AND NUTRITION SERVICE (FNS)- the section of the USDA agency that administers the Food Distribution Program (FDP) and other USDA nutrition programs.

FOOD DISTRIBUTION PROGRAM (FDP) - the federal program under which USDA commodities are given to the state for distribution to recipient agencies.

FOOD SERVICE MANAGEMENT COMPANY- either a for-profit business or a non-profit organization that a recipient agency uses to manage the food service. A written contract between the food service management company and the recipient agency is required to be provided to CDU.

TYPE "A" COMMODITIES - fruits, vegetables, and meats.

TYPE "B" COMMODITIES - grains, dairy products, peanut and oil products.

IN-KIND REPLACEMENT - foods used to replace USDA donated foods that are lost. Replacement foods must be in the same amount, of U.S. origin, of equal or better quality, and at least equal in price to the foods that were lost.

INVENTORY - both the amount and type of USDA donated foods a recipient agency has on hand and the way a recipient agency accounts for supplies of donated foods.

JAIL - an adult correctional institution or juvenile detention facility that conducts a rehabilitation program for a majority of the sentenced inmates. The program must allow at least 10 hours participation in rehabilitative activities per week per inmate of either a majority of the total inmate population or a majority of the sentenced inmates.

NATIONAL SCHOOL LUNCH PROGRAM (NSLP) - a federal program under which participating schools operate a non-profit lunch program. Participating schools receive a cash reimbursement and USDA donated commodities for lunches served.

OKLAHOMA DEPARTMENT OF HUMAN SERVICES - the state agency responsible for administering the USDA Donated Foods Program in the State of Oklahoma.

OUT OF CONDITION FOODS - foods that are infested, deteriorated, contaminated or otherwise unfit to eat.

PLANNED ASSISTANCE LEVEL (PAL) - the dollar value of non-bonus commodities that schools, summer food service programs, Nutrition Services Incentive Program (NSIP), Child and Adult Care Food Program (CACFP), and Residential Child Care Institutions (RCCIs) can plan to receive during the fiscal year. The CDU determines the PAL amount using a formula that includes:

1. a rate of assistance provided by USDA; and
2. participation data provided for the total number of meals served in the prior year.

PERPETUAL INVENTORY - a written daily accounting record used to document the receipt and usage of commodity foods.

PROCESSING - converting commodities into a different end product, such as whole chickens made into chicken nuggets.

RECIPIENT AGENCY (RA) - a school, agency, or organization that contracts with OKDHS to receive USDA donated commodities. A recipient agency may receive commodities for its own use or for distribution to eligible recipients.

SCHOOL FOOD AUTHORITY - the governing body responsible for the administration of one or more schools that operate a nonprofit lunch program.

SCHOOL YEAR - the period of time from July 1 through June 30.

SHORTAGES OR SHORTS - commodity shipments with missing items.

SIMILAR REPLACEMENT - the replacement of lost USDA donated foods with similar foods of U.S. origin of the same types as those donated by USDA and of at least equal dollar value.

SOUP KITCHEN - a public or charitable institution that maintains an established feeding operation for needy homeless people on a regular basis as an integral part of its normal activities.

STATE DISTRIBUTING AGENCY (SDA) - a state agency authorized by USDA to distribute donated foods to eligible recipient agencies and recipients. In Oklahoma, OKDHS is the SDA.

THE EMERGENCY FOOD ASSISTANCE PROGRAM (TEFAP) - a federal program that helps supplement the diets of low-income needy persons, including elderly people, by providing them with emergency food and nutrition assistance at no cost.

TRANSFER - taking commodities from one RA and sending them to another RA of the same type.

UNITED STATES DEPARTMENT OF AGRICULTURE (USDA) - the federal agency responsible for the administration of the Food Distribution Program.

CHAPTER 4
ELIGIBILITY REQUIREMENTS

The following organizations may apply to receive UDSA donated commodities:

- public and private schools,
- public and private residential child care institutions,
- child and adult care food program contractors,
- charitable institutions,
- summer food service program sponsors, and
- nutrition services incentive programs formerly called the Nutrition Programs for Elderly (NPE)

To participate in the Food Distribution Program, an organization completes an application packet and signs a contract that describes the terms the organization has to accept before it can receive commodities. Non-profit organizations must provide verification of their IRS 501-C-3 status.

Application forms are mailed upon request. CDU's address and telephone numbers can be found on page one of this handbook. **Applicants who do not complete and return all materials in the packet by the due date risk delayed delivery of commodities.**

Note: The Oklahoma Department of Education determines categorical eligibility for public schools and RCCI's to participate in the NSLP and CACFP. The OKDHS School Nutrition Program section determines the categorical eligibility for private schools and RCCI's. Once notified a facility is eligible, CDU sends an application agreement form.

ORGANIZATIONS APPROVED AS CACFP'S DO NOT RECEIVE COMMODITIES THE FIRST YEAR OF PARTICIPATION. THEY RECEIVE CASH IN LIEU OF COMMODITIES AS AGREED BY CDU AND THE STATE DEPARTMENT OF EDUCATION. ONCE A YEAR THE STATE DEPARTMENT OF EDUCATION CHILD NUTRITION SECTION MAILS A FORM ALLOWING CACFP'S TO ELECT TO RECEIVE CASH IN LIEU OF COMMODITIES OR COMMODITIES FOR THE NEW SCHOOL/FISCAL YEAR THAT BEGINS JULY 1. THIS NOTICE IS USUALLY MAILED IN JANUARY.

Soup Kitchens /Food Banks: These groups are eligible as charitable institutions and can also receive TEFAP foods. OKDHS has a contract with the Regional Food Bank of Oklahoma in Oklahoma City and the Community Food Bank of Eastern Oklahoma in Tulsa to issue TEFAP foods to needy households for home consumption and to recipient agencies approved as congregate meal sites such as the homeless and battered women's shelters. They distribute TEFAP foods statewide to food pantries, food closets and the congregate meal sites.

CDU charges an assessment fee to cover some costs. The fee is calculated by multiplying the RAs total meal count from the previous year by a rate determined by CDU. Those who do not pay are removed from the program regardless of entitlement balances. Any commodity foods they have in their possession can be removed and returned to CDU inventory.

USDA regulations allow RAs to have permanent agreements unless and until amendments are needed. The agreements issued in 1998 were made permanent. The RA must complete a change of authority form when authorized representatives change.

Exception: The Summer Food Service Program does not operate year round, so an annual contract is required.

CONTACT TAMMY JACKSON, (405) 521-3581, 1-800-848-4019, TAMMY.JACKSON@OKDHS.ORG, TO REQUEST AGREEMENTS AND INFORMATION REGARDING THESE PROGRAMS.

CHAPTER 5
ALLOCATIONS AND ORDERING

USDA assigns a total dollar entitlement for Oklahoma each year based on available funding. USDA may adjust the state's dollar amount for Type "A" commodities in October and January when updated meal count data is received and placed into the system.

CDU uses a forecast ordering method. Each year a forecast sheet is mailed to RAs that lists the foods USDA had indicated will be available for the upcoming year. The forecast forms also have the planned assistance level amounts for Type "A" and "B" foods. The RA completes the forecast sheet to designate the commodities it would rather receive while remaining within their planned assistance level. CDU then allocates the products based on the cases ordered and cases capped entered in the forecast order form. There are instances when the items USDA has offered will not be available. Those PAL dollars can be used for other products by the allocation of the capped amounts if they are greater than the ordered amounts. USDA will at times substitute products that are similar, such as diced peaches for sliced. When USDA offers bonus items or entitlement items that were not on the forecast survey, CDU will send an allocation report that provides the RAs the opportunity to refuse the product.

Type "A" and "B" commodities — CDU offers the RA these commodities up to the dollar amount of the RAs planned assistance level. As noted above, USDA annualy provides a list of the items they plan to purchase. Throughout the year they make purchases to support the market prices and to remove surplus inventory. Some items are not purchased if they are too expensive or do not meet the product specifications and quality USDA requires.

Bonus commodities — The RA is offered a fair share of bonus commodities the state receives from USDA. If the RA listed the item on the forecast sheet, CDU will attempt to deliver the the amounts indicated. Bonus commodities are not counted against the RAs PAL. The RA can refuse these bonus offerings on the allocation report.

The PAL has commonly been referred to as "entitlement" by RAs, but USDA prefers the term "Planned Assistance Level." As the SDA, CDU is awarded the entitlement to order foods for the RAs. Any remaining entitlement is rolled over to the next year and distributed equally to RA's within the appropriate category.

Conditions affecting USDA purchases of commodities include:
• market conditions
• price support requirements
• amount, types, and costs of foods available
• RA preferences.

Note: Type "A" foods are fruits, vegetables and meats. They are highly subject to market forces and are seasonal. USDA cannot predict what will be available, so RAs must remain flexible in their menu planning for Type "A" products.

Schools — CDU figures each school's PAL by dividing the last fiscal school year's total number of reimbursable lunches into the dollar amount authorized by USDA for the National School Lunch Program. The State Department of Education provides meal count information to CDU for public schools and RCCIs. The CDU School Nutrition Section provides the meal count information for private schools and RCCIs. This results in a fair share allocation to all participants. When participants are added or removed, CDU recalculates the allocation to current participants.

Summer Food Service Program — PAL is figured by multiplying USDA's meal assistance rate by the average number of meals served daily to eligible children.

Nutrition Programs for the Elderly, Title III and Title VI have been renamed. They are now known as Nutrition Services Incentive Program (NSIP). In the past these programs could choose to receive cash only, commodities only or a combination of both. The choice is made yearly before the start of the fiscal year. The OKDHS Aging Services Division, Special Unit on Aging manages the NSIP Title III program. They make the determination of cash only or cash and commodities for all those participants. Title VI participants are to be administered by the U.S. Health and Human Services Agency effective October 1, 2003.

Child and Adult Care Food Program (CACFP) – CDU calculates the fair share allotment for these RAs based on the total number of lunches and snacks served in the prior fiscal year. The State Department of Education provides the information on total number of meals

Charitable Institutions – CIs are only eligible to receive bonus commodities. Many of them participate with the food banks. They can receive both the commodities from the food bank and any bonus items offered by USDA. There has been no entitlement provided to fund this program in several years. It is not anticipated that this will change. They must have a current agreement with CDU to receive the bonus items, and a separate agreement for food bank participation.

Soup Kitchens and Food Banks- CDU has an agreement with the Regional Food Bank of Oklahoma in Oklahoma City and the Community Food Bank of Eastern Oklahoma in Tulsa to distribute commodity items purchased with TEFAP funds to those statewide eligible participants such as soup kitchens, food closets or pantries and approved congregate meal sites. Penal institutions, jails and juvenile detention centers are not eligible for TEFAP foods.

USDA uses national unemployment and poverty statistics to allocate the funding for the TEFAP program. Many years ago this was commonly referred to as the "Cheese and Butter" distribution because those were the most common items issued. The food bank does not receive USDA commodities; it only distributes for CDU the TEFAP foods to eligible participants.

Survey — This is the tool used by USDA for states to order items. USDA places the surveys in the Electronic Commodity Ordering System (ECOS) and the CDU ordering staff uses information from the forecast order forms to determine amounts of food to order.

Complaints — RAs can file a written product complaint to inform CDU of specific problems. The most common occurrence is the discovery of some "foreign object" in a product. The RA may email Paula.Price@okdhs.org with information and complaints.

CONTACT NANCY.EBAHOTUBBI@OKDHS, FOR ASSISTANCE IN THE ALLOCATION AND ORDERING PROCESS.

CONTACT MILLICENT COMBS, (405) 521-6473, MILLICENT.COMBS@OKDHS.ORG, ABOUT QUESTIONS ON TYPE "A" FOODS.

CONTACT PEGGY WILLIAMS, (405) 521-4700, PEGGY.WILLIAMS@OKDHS.ORG, ABOUT QUESTIONS ON TYPE "B" FOODS.

CONTACT JUDY RIDER (405) 522-1747, JUDY.RIDER@OKDHS.ORG, ABOUT PROCESSING QUESTIONS.

CHAPTER 6
STORAGE

All RAs sign a contract with CDU agreeing to safeguard USDA commodities once they are delivered. The contract terms reflect health department regulations and general industry standard practices.

In order to safeguard these commodities, RAs must develop and maintain a written system of accountability for the USDA products received. OKDHS refers to this as a "Perpetual Inventory." The perpetual inventory is a complete and accurate record of the receipt, distribution, use, disposal and physical inventory reconciliation of commodities. The CFR allows either a single inventory system or the state may require inventories to be maintained in a manner other than described in 7CFR, Part 250.

OKDHS-CDU recommends each item be listed on a separate page for ease in updating and reconciliation. Count quantities in units, including parts of cases. For example, seven cases and three cans of peanut butter. CDU recommends completing physical inventory reconciliation at least monthly. Many RA's have a computerized inventory system. These systems must be accurate so they maintain accountability for the USDA products.

Do not store commodities in private homes at any time. Keep all records relating to the commodity program for the current year as well as the three prior years.

Storage of commodities involves two major components. storage conditions and storage practices. Storage conditions are proper temperature and adequate air circulation. Storage practices include first in, first out (FIFO), proper stacking, protection of stored food, storage during summer months and a perpetual inventory system

One of the major keys to proper storage is to request and accept no more food than can be used without waste in a six-month period, or by the best if used by date. RAs may contact like agencies for possible transfer of excess products. CDU must approve ALL transfers.

Document temperatures daily during operation. Record the temperature late each Friday afternoon and early Monday morning if the operation is closed weekends. Check the storage area immediately and record the temperature after a known or suspected power loss, or mechanical malfunction. During school breaks or the summer months, the temperatures should be checked and recorded at least every other day, with no more than a two-day gap. Keep thermometers in all storage areas where commodity foods are stored.

Checking temperatures daily increases the likelihood freezer failure will be noticed before a thaw occurs. If food is lost due to freezer failure, the lack of a properly completed temperature log may be considered negligence and CDU or USDA could file a claim requiring repayment for the products.

The recommended temperatures are:
- 70 degrees or below in dry storage
- 32 to 40 degrees in refrigerators
- zero degrees or below in freezers.

All storage areas need air circulation. Commodities are stored on pallets or shelves with adequate clearance from the floor and walls and two feet of clearance from the ceiling. Never store directly on the floor of any of your storage units.

Commodities with the oldest pack date on the case are placed in front and used first. This is referred to as a FIFO system: first in, first out. Mark food removed from a case with the pack date and use the oldest first. In cases where the pack date is not available, use the receipt date.

Stack commodities low enough so bottom layers are not crushed, cross-stack to keep the stack solid and orderly and away from moisture, heat sources or steam.

Protect food in storage by checking regularly for deterioration, such as torn sacks and broken cartons. Keep all storage areas clean. Store food away from chemicals and paper goods. Exterminate the facility monthly or more often if there are infestation problems and at least quarterly if not. Keep storage areas locked and limit key access to authorized personnel. Areas where commodities are stored should not be accessible to anyone but the designated food service staff. Commodity foods are not to be used for any purpose other than the approved USDA programs and participants.

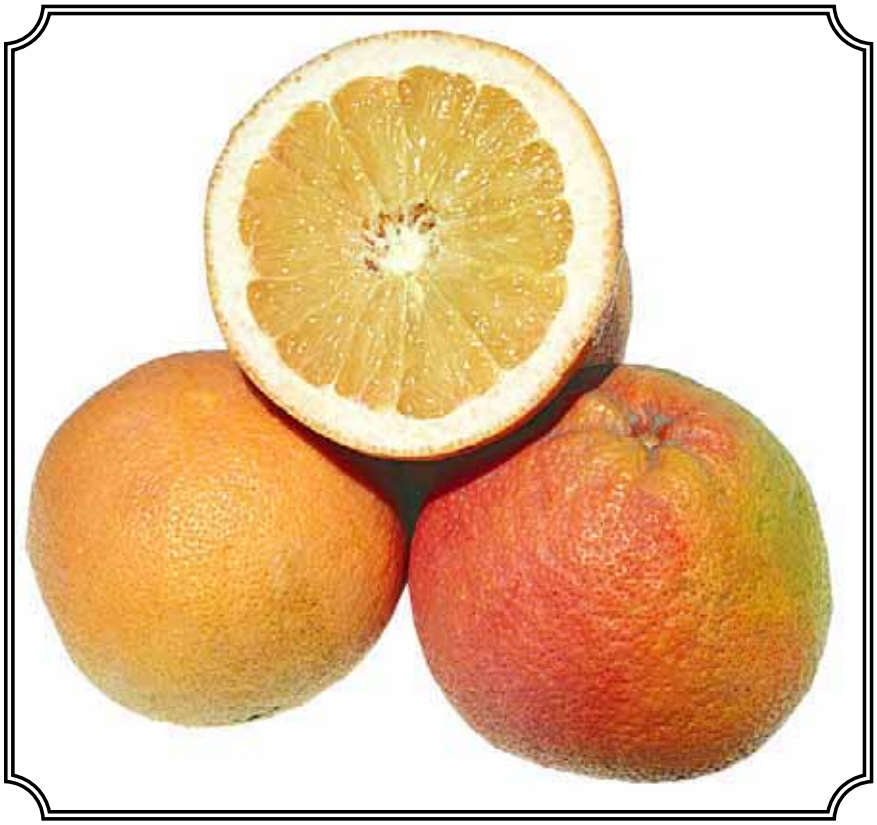
USDA donated foods going into summer storage need special handling to prevent losses. Try to use up most donated foods received earlier in the school year so less food has to be stored over the summer break.

Do the following when storing food over the summer:

- Clean and check storage areas for infestation before storing food
- Store flour and other grain products in refrigerators or freezers
- Stack freezers with meat items on the bottom. In case of a freezer failure, there is no cross contamination of foods.
- Check and record temperatures daily, if possible, and at least every other day with no more than a two-day gap.

In the fall, check commodities for signs of damage and take another physical inventory to make sure the beginning inventory is accurate. Report any losses immediately.

(See Chapter 8 for more details on losses).



CHAPTER 7
DELIVERY

Most USDA commodities are delivered from the state warehouse in McAlester, except for commodities sent directly to large RAs and processors. Once a month, CDU staff allocates available products based on what RAs have ordered and their remaining PAL. The warehouse uses the allocation information to determine loads for delivery according to a route schedule.

CDU does not charge a delivery fee or fee per case for USDA foods. There is an annual billing that each RA must pay (this is for entitlement programs only). This is based on the annual meal count data and is called an **"Assessment Fee."** The assessment fee helps defer some of the CDU expenses associated with the administrative costs of ordering, storing, and distributing commodities. Failure to pay results in termination of benefits and further receipt of food from the commodity program.

RAs are issued a shipping document that notifies them of the products to be delivered along with the delivery or drop site, date and time. If you have been told by the warehouse staff that you will receive a direct delivery, the old drop site will still be listed. You will not need to go meet the truck at the old drop site as it will be delivered directly to your facility. If you had direct delivery in the prior school year, you will continue to have direct delivery.

If you ordered 100 cases of green beans and capped your order at 120 cases, you are responsible to take at least the 100 cases. We never plan to deliver a product all at once. However, there are times the UDSA changes the delivery dates and delivers them to our warehouse all at once, despite our best efforts to so carefully spread them over several months. We do not have control over when USDA will purchase and ship the items, so if the 100 cases arrive at one time, you will be responsible to accept the delivery. CDU does not deliver processed foods. The processor and school determine the delivery schedules and amounts.

The computer program and system we have should not allocate more than the capped amount designated on any item. If there are foods not on the forecast sheet, you will be notified of your initial allocation and must reply by the deadline to refuse your fair share amount.

General guidelines to pick up commodities:

- Be on time.
- Have a signed copy of the shipping document.
- Show your driver's license to the CDU driver.
- Bring enough help to get your load.
- Ensure the load is in good shape and all items are accounted for before signing for them.

General guidelines to have commodities delivered to a facility:

- Be prepared to call and have your helpers there within 15 minutes of the truck's arrival.
- Have a signed copy of the shipping document.
- Have enough help and equipment to get your load into the facility.
- Ensure the load is in good shape and all items are accounted for before signing for them.

A school official must sign the shipping document. It can be the person who is picking up the food. This does not have to be the designated authority or authorized representative on our official records. The person who picks up or receives the food must sign in addition to any other signatures that may be on the document. The person must also provide a driver's license or other form of identity if requested by the driver.

If the product is in questionable condition or amounts are not correct, note the problem on the shipping document before signing and have the CDU driver initial the notation. Notify the CDU office in OKC immediately.

Note: Refusals are not allowed at the point of delivery unless the product has obvious signs of deterioration such as thawing, broken or severely dented cans, or insect or rodent infestation.

Warehouse delivery personnel are responsible to:

- be at the designated drop site on time,
- move the load to the tailgate
- check the pallet contents before signing the shipping form,
- verify the identity of the person picking up the load.

Note: CDU drivers are not responsible to help RAs load their vehicles. The drivers will only get the load to the tailgate of our truck. It is the responsibility of each recipient agency to bring a big enough vehicle to carry the load and enough people to pick up their loads

CONTACT COMMODITY WAREHOUSE MANAGER PHILLIP BUTLER, PHILLIP.BUTLER@OKDHS.ORG, OR WAREHOUSE SUPERVISOR SHIRLEY KITCHELL, SHIRLEY.KITCHELL@OKDHS.ORG, AT 1-800-818-7118.

Delivering directly to all schools is our goal. This has been initiated in most counties and we hope to have statewide direct deliveries by the end of the 2004 school year. Even with direct delivery schools are responsible for having adequate help to unload orders in a prompt and courteous manner.

Those that have direct delivery will not be given a specific time for delivery, only the date of the delivery. The drivers will not wait more than 15 minutes for you to call your helpers for unloading. If you miss the delivery, you will have to make arrangements to pick up at the warehouse or have that delivery added to the following month's delivery. After you miss two deliveries, the food will be given to another RA.

CHAPTER 8
COMMODITY LOSSES

The RA is responsible to safeguard USDA commodity foods from losses. If a recipient agency stores donated foods under less than favorable conditions, it does so at its own risk and is in violation of its contract with CDU.

A commodity loss is inventory adjustments due to factors such as an unexplained loss of inventory during physical count reconciliation, theft, and food that is no longer edible due to age, damage, infestation, or spoilage. This includes processed foods.

Immediately notify CDU in the event of a loss, regardless of its size. Foods that are no longer edible must be disposed of properly. If you have a loss, contact the local health department sanitarian for assistance in disposing of the products. Once the health department sanitarian completes the Disposition Form, the RAs provide the form to CDU as soon as possible. In the case of foods that may be edible but the age and general condition compromise the quality of the food, CDU and USDA may authorize the transfer to an unlike category. This has to be approved PRIOR to the transfer. The food has to be determined "fit for human consumption" by the health department sanitarian.

Foods that are beyond their best if used by date and no longer safe for human consumption will be destroyed and a claim filed with repayment required. This is cited as "excessive inventory" since the food was not utilized before it was no longer edible. The current value of the food will be billed to the RA for repayment.

When authorized by CDU or the health department, please use the following guidelines when disposing of food.

- Destroy carton labels and remove product from USDA packaging.
- Destroy food and ensure that it cannot be eaten. For example, remove it from the USDA container and pour bleach or other substance on it.
- Some products may have to be taken to a landfill for proper disposal.

Note: If health department officials are not available, contact CDU. Those who destroy before authorized will be billed for the loss. Repeat offenders will risk termination of their agreement and receipt of USDA commodities. There are instances that health department officials will not recommend disposal based on the fact a product has been stored properly and there are no "visible" signs of deterioration. CDU can CONDEMN these items. Example: If a product is two years beyond the best if used by date, has been frozen solid the entire time and has no obvious freezer burn, it still must be destroyed. The RA will be billed due to age and safety concerns. The health department does not have the final determination. CDU and USDA make the final determination.

Use the Loss Report Form in the forms section of this handbook to report losses of USDA donated foods to CDU within five working days of a loss. Give all information requested on the Loss Report Form, including an explanation of how and why the loss happened and all supporting information. Some examples are:
Freezer losses: Send temperature logs for the 30 days before the loss, health department disposition sheet, freezer repair bills, and loss report form.
Theft: Send police report, updated perpetual inventory and proof of any repairs to the facility.
Old product/spoilage: Send health department disposition sheet and updated perpetual inventory. (The CDU may also review your menus for the past months.)

There has been a common practice to transfer old inventory to the Charitable Institutions. This can only be done with the approval of the USDA National office staff in Washington, D.C.

RAs are accountable for losses of all donated foods, including those diverted for further processing, that occur due to improper storage or handling. CDU reviews the loss report form and other documentation sent by an RA reporting a loss of commodities. If the loss happened because of negligence, USDA may require repayment.

In all instances when the items lost are considered to be excessive inventory, that is old items that have been in inventory longer than they are considered fit for human consumption, repayment will be required.

Manage your inventory levels to have no more than you can use at the current rate before the expected shelf life/best if used by date designated by USDA is exceeded. The code of federal regulations also recommends you have no more than a six month supply of a product. As noted we recommend you use and order products so they do not go beyond the best if used by dates.

The six-month supply is relative to the amounts and rates you use products. If you have items that you do not feel you can menu and use before they are too old to use, then contact CDU for permission to transfer items to a like agency. These items must be used before you are required to pay for them. In some instances CDU and USDA allow replacement-in-kind. If this is permitted, Type "A" and "B" non-bonus commodities may be replaced with the same amount of an equal or better quality food purchased by the RA from the time of the loss. Receipts are required to document these purchases. The replacement in kind must be satisfied within 120 days of the loss. Additional time may be granted with a written request specifying an acceptable reason more time is needed.

USDA requires that all bonus commodities lost, regardless of the reason for the loss, be paid for at the current price.

A CDU social services inspector will make an on-site visit to complete a loss investigation and report of all losses over $100. This does not mean you will not be billed for less than that amount. In the instance of foods destroyed due to age, a claim will be filed and you could be billed for that amount even if less than $100.

Report all losses, even small losses or shortages discovered in inventory reconciliation, to CDU. CDU keeps an accumulative loss log each school/fiscal year. Once the accumulative total exceeds $100, a social services inspector will make an on-site visit to complete a loss investigation and report. The normal procedure is to allow replacement in kind in equal values to the items lost.

There are times that you will have losses that include new products and old products. In those losses, you are usually allowed replacement in kind for the products that are not old. These will not be considered excessive inventory. Repayment will be required for the older products.

There are instances when losses result in a NO CLAIM determination against the RA. USDA authorizes these, and they are usually losses that occur as a result of a Federal Disaster Declaration. Some examples would be floods, ice storms or tornadoes.

Contact Mattie Williams, (405) 521-4991, 1-800-848-4019, Mattie.Williams@okdhs.org to report losses and for information.

Social Services Inspectors conduct on-site reviews and loss determination reports. They are also responsible for the commodity compliance reviews, complaint investigations and initial eligibilty determinations for charitable institutions. They provide technical assistance visits to RAs and upon request conduct training sessions.

Contact the social services inspectors at ChetB.Center@okdhs.org; Pamela.Dean@okdhs.org; DonnaG.Chasenah@okdhs.org.

CHAPTER 9
TRANSFERS

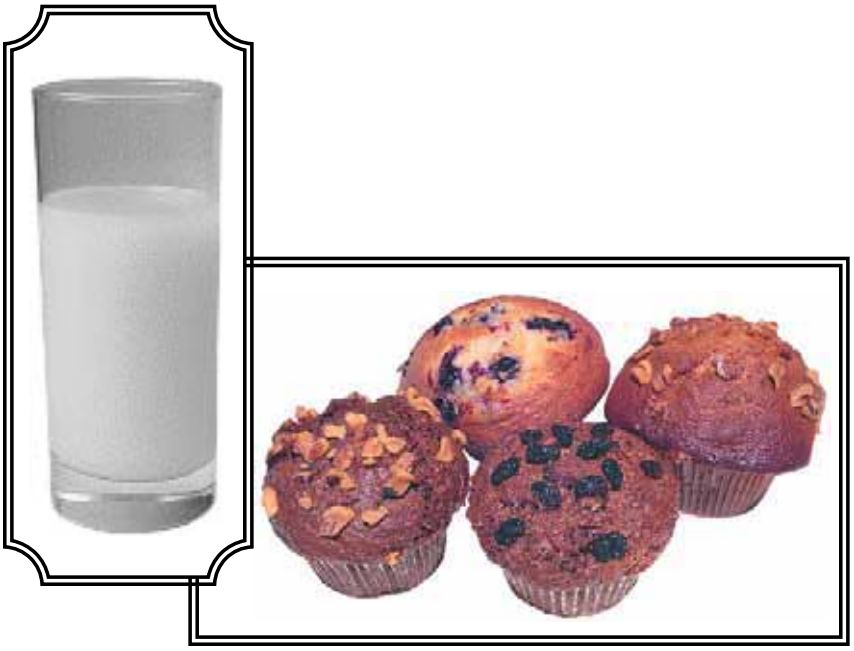
RAs are required to request and accept no more commodities than they can store and use without waste before the "best if used by date." When an RA finds it has more of a product that it can use, it should contact other LIKE RAs in the area to see if they would like to take some of the product. Once another RA is found who is willing to take the product, call CDU for approval.

Transfers of USDA commodity foods generally are only authorized between like agencies. This means school to school or school to child care facility or child care to child care, or school to child care or child care to school, for example.

All transfers must be authorized by CDU before they are made.

It is important to comply with these rules. When you call to request the transfer, have the pack date of the product and amount of the product you wish to transfer available.

Only the Programs Administrator or a Social Services Inspector can authorize a transfer.



CHAPTER 10
APPROVED USES OF COMMODITY FOODS

RAs are to use commodity foods for the preparation of reimbursable meals. Donated foods may be used to prepare meals served under any other meal service activity operated by the RA under the non-profit food service account. These would be things like the school breakfast program, a la carte sales, and meals and snacks in residential child care institutions.

Commodity foods received under the National School Lunch Program may be used for training students in home economics, nutrition, food preparation and child care. Only Type "B" food products can be used for training. The prepared end products of training courses cannot be sold. They must be used either in the classes or in the school lunch, school breakfast or after school snack programs.

Commodity foods used for training are not replaced. School food authorities should ensure the use of commodities in training courses does not cause a shortage in their school lunch program.

When commodities are used for training, the perpetual inventory sheet for those items will be updated showing quantities used.

Commodity foods may not be sold, traded or exchanged. They may be used in workshops or for demonstration purposes after getting approval from CDU.

Schools may use commodity foods in their a la carte food service and adult meals served during the regularly scheduled breakfast and lunch periods if:

- these same foods are served at some time during the year as part of a reimbursable meal, and
- money received from selling these foods goes into the RA's nonprofit food service account.

RAs may also sell the packaging of donated foods as long as the money received from the sale goes into the RA's nonprofit food service account.

The questions below show how USDA regulations work.

Q: Can a school sell extra hamburgers on the a la carte line?
A: Yes, this is an appropriate use of commodity foods.

Q: Can a school sell sweet rolls made with bonus flour in the teacher's lounge?
A: No, this is not a meal service activity covered under the non-profit school food service account.

Q: Can a school use commodity foods to prepare banquets for school or non-school functions such as sports banquets, PTA meetings, etc.?
A: No, these activities are not covered under the non-profit school food service account.

Q: Can a school bake and sell cookies using commodity foods?
A: Yes, the cookies can be sold in the a la carte line but not as a general-purpose fundraiser.

CHAPTER 11
FOOD SAFETY AND RECALLS

When a USDA commodity may be dangerous or has not been made according to USDA's bid specifications, USDA may place it on hold. Temporary holds allow for further testing of the questionable product. CDU will inform all RAs of any temporary holds. The notice will give the product name and contract number. If the RA has removed the commodity from its original carton, all of that product on hand is held until further notice. The contract number and pack date should be recorded on the inventory record for any item removed from the original container. The RA does not destroy or use the product until CDU authorizes them to do so.

Recalls are generally the result of a commodity:

- not meeting USDA's bid specifications,
- contamination,
- infestation,
- other health or safety concerns.

USDA initiates all recalls. CDU notifies RAs of recalls and instructs them in the disposal of the products and provides information regarding the basis for recall. If destruction of the commodity is chosen, RAs may have to send proof, such as a certification from a landfill site.

RAs follow the specific directions of CDU before any commodity is destroyed. RAs are responsible for storing commodities correctly once they are received. Failure to do so may result in spoilage and an unsafe product. When a loss is caused by negligence, CDU may file a claim against the RA for the loss at the current USDA purchase price.

Recalls that affect Oklahoma will be posted in the OKDHS/CDU website, www.okdhs.org. Click on Commodity Dist.

CHAPTER 12
USE OF COMMODITIES IN A DISASTER

When the President or other authorized official declares a major disaster or emergency, disaster organizations may ask CDU to provide commodities for congregate meal service to disaster victims. In cases of local emergencies, USDA foods can be served, but the RA has to have food they are willing to use. The food may not be replaced by USDA. This has been common when the RA facility, such as a school, is used as an emergency shelter during floods or other evacuation situations. The RA contacts the CDU administrator, but in an effort to serve those in need this is not required prior to the use of the food for local emergencies and disasters.

In Oklahoma, the CDU administrator releases foods to designated authorities such as the Salvation Army, the American Red Cross or State Civil Emergency Management Office. The administrator obtains approval from USDA.

This food is for congregate feeding ONLY and not for household consumption. Requests for commodities must include the following information to the extent possible:

- description of the disaster or emergency situation,
- number of people needing meals and for how long,
- amounts and types of food needed, and
- number and location of sites providing congregate meal service.

In the case of a major disaster or emergency determination, contact Paula Price, Paula.Price@okdhs.org, (405) 521-6079, (405) 919-9063.

Oklahoma Department of Human Services Commodity Distribution Unit, (405) 521-3581, 1-800-848-4019.

CHAPTER 13
PROCESSING

RAs may use contracts with the food processing industry to convert commodity foods into more convenient and usable forms. This may provide more varied and higher quality meals, reduce labor and waste and stabilize costs through portion control.

State and federal auditors require that RAs submit copies of shipping invoices once the products are received. This ensures all products that are diverted and charged to the state's entitlement and the RAs planned assistance level are received. Due to the amount of staff time required to order and track these shipments, CDU requires that a full truck be sold before an order is placed. CDU will not order unless the broker or processor can provide lists and amounts to be charged to individual RAs planned assistance levels. CDU does not allow RAs to backhaul from the warehouse in McAlester. CDU does not deliver processed items.

A processing contract is a written agreement with a commercial food processor to provide a service or a product made partially or wholly from food donated by USDA. CDU and the USDA Regional Office in Dallas must approve all processing contracts. The processors may sign a contract any time during the year, but all contracts expire June 30. The contract can be extended for one year at a time, not to exceed two extensions before a new contract is required. The CDU processing specialist notifies all processors when USDA releases a new survey. There are capped amounts set by USDA for categories of products.

NOTE: The RA pays the cost of processing directly to the processor.

A large variety of products can be processed from donated food. Some examples are:
Bread products from flour, nonfat dry milk, shortening, rolled wheat and oats, raisins, and peanut butter and granules;

Pizza from flour, cheese, tomato paste, and oil;
Ice cream and frozen yogurt from nonfat dry milk;
Mayonnaise and salad dressing from soybean oil;
Precooked, portion-controlled meatballs, beef patties, and meat loaves from ground beef or ground pork or both;
Precooked, portion-controlled nuggets, patties, and roasts from chicken or turkey.

RAs in Oklahoma may participate in processing. CDU can have the commodity shipped directly, commonly referred to as "diverted," to the processing plant. The processor produces a finished product and ships it directly to the RA.

Contact Judy Rider, Judy.Rider@okdhs.org, (405) 522-1747, for information about this program.

CHAPTER 14
CIVIL RIGHTS GUIDELINES

Agencies receiving donated foods are required to follow the provisions of Title VI of the Civil Rights Act of 1964 and USDA civil rights regulations. These include:

1. Have an open admission policy that includes a nondiscrimination statement such as: "This facility is operated in accordance with USDA policy which does not permit discrimination because of race, color, sex, age, disability, religion or national origin." This should be on all application forms and promotional materials.
2. Inform the public of program availability and eligibility standards at least every two years. This can be done through newspaper advertisements, flyers, brochures, etc.
3. Inform potential participants of any significant program changes.
4. Display the USDA " . . . And Justice for All." poster.
5. Be able to provide information to participants in other languages if there is a large non-English speaking population.

RAs collect racial and ethnic data on their service area and keep the records on file for three years. This may include self-identification where a written application is required, such as a sign in sheet, or observation by staff. This does not have to be done on a daily basis, but should be done at a regular intervals designated by the RAs. The identification categories should include American Indian or Alaskan Native, Asian or Pacific Islander, Black (not of Hispanic background), Hispanic, and White (not of Hispanic background).

Monitoring for compliance with Civil Rights requirements is done by the State Department of Education for Schools and CACFPs, HHS for the NSIP Title VI. CDU monitors all others and coordinates for total compliance.

Compliance with federal laws and USDA civil rights regulations includes an annual training by the recipient agency in these areas:

1. USDA's nondiscrimination policy.
2. Collection of racial and ethnic data.
3. Public notification.
4. Complaint handling procedures.
5. General sensitivity to minority needs.

Documentation of the date of training, number of participants, and the instructor must be kept with the Donated Foods Program Application Agreement for three years.

CHAPTER 15
COMMODITY COMPLIANCE REVIEWS

CDU is required to conduct on site reviews of RAs including their centralized warehouses or supply storage areas.

CDU Social Services Inspectors conduct commodity compliance reviews to determine the RAs compliance with eligibility criteria, food ordering procedures, storage practices, inventory controls, reporting and record keeping requirements and civil rights requirements.

All categories are subject to these reviews with a scheduled frequency of at least one review every four years for each RA. The inspectors attempt to conduct reviews at least 25 percent in each category on an annual basis. The frequency may be more than one review in a four-year period. The inspectors will also conduct follow up visits to monitor compliance with corrective action plans for those RAs who had "findings." Failure to respond to the findings letter the programs administrator sends after a review could result in the removal from the program. Failure to comply with the corrective action plan could also result in removal from the program.

When visits are required due to losses, reviews will also be conducted at that time.

Investigators also respond to all complaints alleging fraud, misuse of commodities and other referrals indicating suspected irregularities associated with the distribution or use of USDA donated foods.

The Social Service Inspectors also provide training and technical assistance as needed and requested. CDU Social Service Inspectors are: Chet Center, Pam Dean and Donna Chasenah.

CHAPTER 16
SCHOOL NUTRITION PROGRAMS

The CDU maintains an agreement with the USDA for the operation of the National School Lunch Program (NSLP), School Breakfast Program (SBP), the Special Milk Program (SMP), and After School Snack Program for non-profit private schools and private residential child care institutions. The SNP staff determines the eligibility of these participants to receive the USDA reimbursement for free and reduced meals and free milk. Coordinated Review Effort (CRE) on site reviews are completed for each school food authority once in a five-year cycle. They also do a nutrient analysis as part of the School Meals Initiative. Technical assistance visits are made at the specific request of the RCCIs or schools. SNP staff makes routine monitoring visits. The participants complete new contracts each year. New participants can be added at any time during the school year. Claims for payment are processed and approved by SNP staff each month.

Contact Betty Craig, (405) 522-1526; Betty.Craig@okdhs.org, or Gina Kazerooni, (405) 521-6472, Gina.Kazerooni@okdhs.org, for information about these programs.

APPENDIX A

STORAGE LIFE TABLE

APPENDIX A
STORAGE LIFE TABLE

This appendix contains information gathered from the USDA Commodity Fact Sheet Handbook, revised 1996. It is meant to be a quick reference guide to the approximate storage life of commodity foods.

Storage life means the time between when a food is packaged and when it is actually prepared and consumed. Storage life is not an expiration date or an indicator of food safety. The storage times given here are approximate and are best estimates only.

In general, food should be stored in its original packaging in a cool, dry location for no more than 12 months. Exposure to moisture and heat dramatically shortens shelf life. **DRY STORAGE SHELF LIFE IS CUT IN HALF WHEN TEMPERATURES REACH 90 DEGREES.**

Best storage temperatures are:

- dry storage 50 to 70 degrees F.,
- refrigerated storage 36 to 40 degrees F.,
- freezer storage 0 degrees F. or below.

FROZEN MEATS at 0 degrees or below

Beef roasts	12 months
Ground Beef and Pork	9 months
Beef patties	4 months
Cooked Ham	2 months
Whole Turkey	9 months
Turkey Roasts	7 months
Ground Turkey	3 months
Turkey Sausage	3 months
Cut Up Chicken	8 months
Diced Chicken	6 months
Breaded Chicken	4 months
Salmon Nuggets	6 months

CANNED MEATS stored at 70 degrees F.

Beef, Chicken, Pork..... 36 months
Tuna..... 36 months
Salmon Pouches.....36 months

EGGS

Dry egg mix.....12-15 months at 70 degrees F.
Frozen eggs .....12 months at 0 degrees F.

CHEESES

American process.....12 months at 32 degrees F.
Cheddar.....12 months at 32 degrees F.
Mozzarella.....12 months at 0 degrees F.
Reduced fat Cheddar.....5 months below 40 degrees F.
Lite Mozzarella.....5 months at 38-42 degrees F.

FROZEN FRUITS at 0 degrees F. or below

Blackberries.....8 months
Blueberries.....18 months
IQF Strawberries.....15 months
Peaches.....18 months
Peach Cups.....18 months
Orange Juice Concentrate.....24 months
Cherries.....24 months
Apple Slices.....18 months

CANNED FRUITS at 70 degrees F. or below

Applesauce.....24 months
Apple Slices.....24 months
Cherries.....18 months
Mixed Fruit..... .24 months
Peaches.....24 months
Pears.....18 months
Pineapple.....24 months
Plums.....18 months
Plum/Prune Puree..... 9 months

CANNED VEGETABLES at 70 degrees F. or below

Green Beans	24 months
Carrots	30 months
Corn (liquid pack)	36 months
Peas	36 months
Salsa	24 months
Spaghetti Sauce	24 months
Sweet Potatoes	24 months
Tomatoes	24 months
Tomato Paste	18 months

DRIED FRUITS and NUTS

Walnuts	10-20 months at 32 degrees F.
Date Pieces	12 months at 0 degrees F.
Fig Nuggets	12 months at 0 degrees F.
Prunes	18 months refrigerated
Raisins	18 months refrigerated

FROZEN VEGETABLES at 0 degrees F. or below

Green Beans	12 months
Corn	24 months
Peas	14 months
Potatoes, French Fried & Rounds	12 months

GRAIN PRODUCTS AND PEANUT BUTTER at 70 Degrees F.

Peanut butter, all types	18 months
Peanuts, all types	24 months
Cornmeal	12 months
Flour, all types	12 months
Macaroni, Spaghetti, and Rotini	36 months
Rolled Oats	12 months
White Rice, Plain	24 months
White Rice, Parboiled	20 months
Nonfat Dry Milk	12 months
Vegetable Oil	12 months
Vegetable Shortening	24 months

APPENDIX C

CDU INFORMATIONAL FLIERS

SUMMER CLOSE-DOWN

PROCEDURES

- If room is available, store as many grain products as possible in freezers or coolers (to prevent weevils from hatching due to warm temperatures).
- Keep other dry commodities in **as cool an area as possible.**
- Make arrangements for temperature logs to be maintained all summer. This is usually done every other day, late Friday evening, and every Monday morning.
- Protect the storage area against theft and limit access to avoid commodity losses.
- Make a record of all food in storage to use as your closing inventory.

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DRY PRODUCTS

STORAGE PROCEDURES

1. Store commodities on shelves or pallets at all times.
2. Store commodities away from the walls to allow for adequate air circulation.
3. Ensure that the storage area is cool and dry.
4. Mark commodities with the date of receipt and the pack date to ensure "First-in–First-out" procedures are followed except when pack date is older.
5. Keep storage area clean and protected against theft.
6. Limit access to storage areas to authorized personnel only.

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INVENTORY PROCEDURES

Develop a written system of accountability for the commodities you receive. USDA refers to this as a "perpetual inventory." This is your complete and accurate record of the receipt, distribution and use, disposal and inventory of commodities.

- ✔ Keep all records relating to the Commodity Program for three years prior to current year.
- ✔ Do not store commodities in private homes at any time.
- ✔ Approval required from the Commodity Distribution Unit prior to transfer requests of commodities between agencies or sites.

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PEST CONTROL
PROCEDURES

Monthly exterminations by a licensed, bonded professional contractor are your best protection against vermin and rodents.

Keep the invoices from your monthly exterminations in your records. Should you incur a loss due to infestation, this may help in the liability determination. The USDA Claims Manual requires monthly exterminations for a no-fault determination.

You may have your own staff perform the extermination service, but to avoid contamination of food products consult your local Health Department for guidelines regarding chemicals to use and safety procedures.

Maintain a complete log of self-exterminations, and indicate the date of the extermination, areas exterminated and chemicals used. Also, record date, person talked to and chemical recommendation provided by the Health Department.

Please note that monthly exterminations will not prevent weevil infestation, nor do they alleviate liability if infestation occurs.

Proper storage in a cool area is the only measure to help prevent hatching of weevils. The recommended temperature for the storage of grain products is 70 degrees and below.

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COMMODITY LOSSES

REPORTING & DISPOSING

Reporting Procedures

Report all losses to the Commodity Distribution Unit and prepare a written report. Include the date the loss was discovered, the name of the item, number of items lost, and cause of the loss in the report. If losses are over $100, a formal review by a state reviewer will be completed.

Disposing of Losses

In losses of more than $100, contact the local Health Department, and send a copy of the disposition sheet they complete to the Commodity Distribution Unit. Please, continue to report losses of less than $100 to the Commodity Distribution Unit. You may dispose of the damaged items, immediately.

Tips for Disposal of Losses

Remove items from the original USDA containers. If food appears consumable, mix with bleach prior to placing in a garbage disposal. Use the garbage disposal when at all possible to ensure complete disposal.

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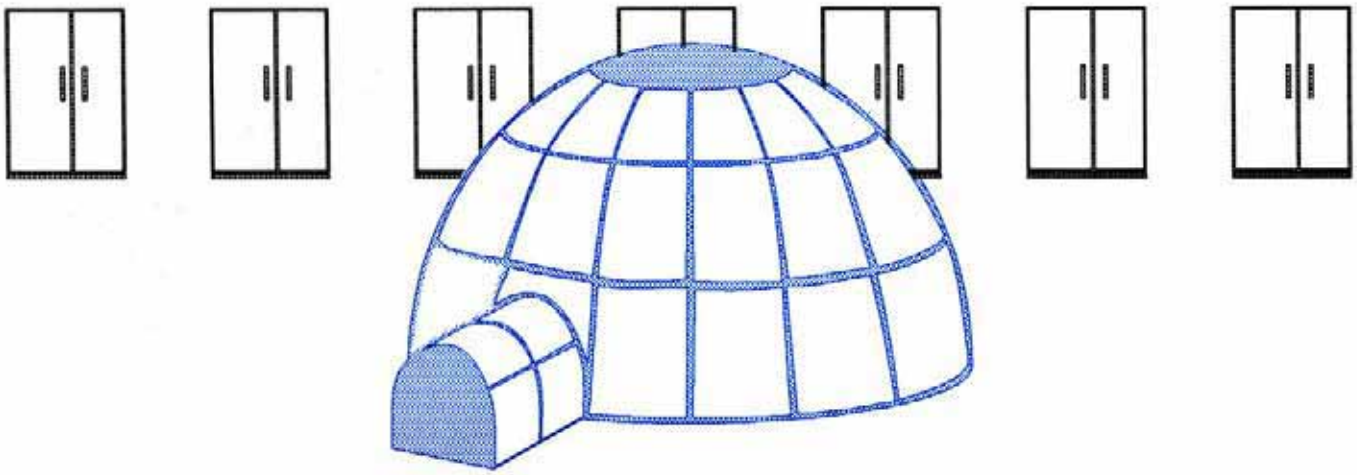
REFRIGERATORS AND FREEZERS

STORAGE PROCEDURES

- Keep thermometers in all refrigerators and freezers used for the storage of commodities.
- Strive to keep refrigerator at the ideal temperature of 32-40 degrees. Strive to keep freezers at 0 degrees or below.
- Maintain temperature logs daily during the school year and at least every other day during school vacations and summer breaks.



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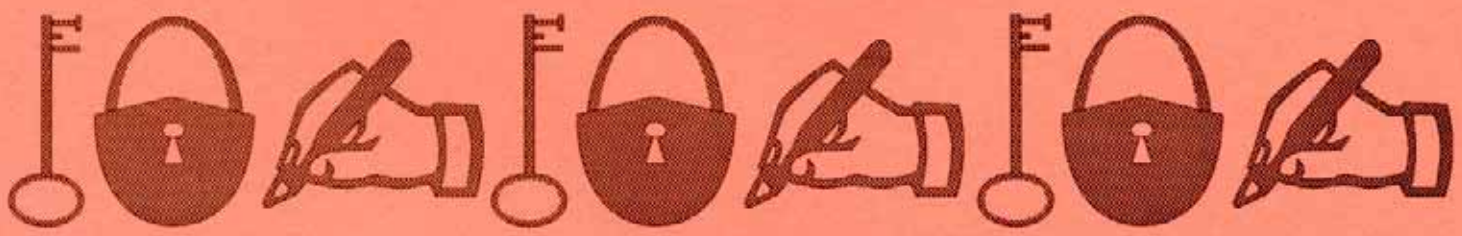
FALL START-UP PROCEDURES

- Check all commodities for signs of damage.
- Take physical inventory to ensure accuracy of beginning inventory balance.
- Report any losses as soon as they are discovered.



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CIVIL RIGHTS CHECKLIST

DO YOU...

1. Display the "And Justice For All" poster in a prominent location?
2. Include the nondiscrimination statement in all program publications and materials?
3. Inform the public of program availability and eligibility standards at least every two years?
4. Regularly inform potential participants of significant program changes?
5. Collect and complete racial and ethnic data on all applicants? The ethnic data of program participants must be collected at least once per year.
6. Provide bilingual materials or interpreters when needed?
7. Submit all complaints alleging Civil Rights violations to USDA officials? This may be done as noted on the "And Justice For All" poster, or you may contact the Commodity Distribution Unit at DHS.
8. Train your staff in the collection of racial and ethnic data and complaint handling procedures, as required by the Civil Rights Act?

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