



# Wisconsin Commodity Supplemental Food Program State Plan

[§ 247.6 State Plan](#)

Submission to USDA for FFY26:  
8/15/2025

Approved by USDA: 9/23/2025

A handwritten signature in black ink, appearing to read "Jeff Miller", written over a horizontal line.

Signature of Wisconsin Department of Health  
Services (DHS) CSFP Coordinator

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# 1 Commodity Supplemental Food Program (CSFP)

The Commodity Supplemental Food Program (CSFP) works to improve the health of low-income persons at least 60 years of age by supplementing their diets with nutritious USDA Foods. USDA distributes both food and administrative funds to participating states and Indian Tribal Organizations to operate CSFP. State agencies distribute CSFP food to public and nonprofit private local agencies. Local agencies determine the eligibility of applicants, distribute the foods, and provide nutrition education.

CSFP offers a monthly food package with a variety of nutritious foods, such as unsweetened or lightly sweetened canned fruits, low sodium or no salt added canned vegetables, low fat dairy products, whole grain cereals and pasta, and a variety of protein foods including lean meats, poultry, fish, and beans.

CSFP is administered at the Federal level by the United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS). State agencies are responsible for administering the program at the state level and may select local agencies to administer the program in local areas of the state. State and local agencies must administer the program in accordance with the provisions of the following Codes of Federal Regulation:

- [7 CFR Part 247 - Commodity Supplemental Food Program](#)
- [7 CFR Part 250 - Donation of Foods For Use in the United States, its Territories And Possessions and Areas Under its Jurisdiction](#) (applicable provisions)

## 2 State Plan overview

The State Plan ([7CFR 247.6](#)) is a document that describes how the state agency will operate CSFP. Once submitted by the state agency and approved by FNS, the State Plan is considered permanent, with amendments submitted at the state agency's initiative, or at FNS request. Upon approval the State Plan will be posted to the Wisconsin Department of Health Services (DHS) [CSFP webpage](#) and will be updated any time a new State Plan is updated and approved.

The Wisconsin CSFP State Plan consists of:

1. The **State Plan** (this document) serves as the DHS guide for administering CSFP in the state.
2. Attachment A: **CSFP Operations Manual** serves as the guide for local agencies to administer the program.
3. Attachment B: **DHS Grant Agreement Template**. Described in Section 5, this document is the template used for contractual agreements between DHS and local agencies administering the program.
4. Attachment C: EXHIBIT 1 CSFP Grant Addendum: **Scope of Work**
5. Attachment D: Blank Template EXHIBIT 2: WI CSFP Caseload, Fiscal Allocation, and Service Area (File: WI\_CSFP\_Agreement\_Template.pdf)
6. Attachment E: Copies of all agreements entered into by the State Agency (per [7 CFR 247.6](#))

### 3 State agency administering CSFP in Wisconsin

The Wisconsin Department of Health Services (DHS) administers CSFP in Wisconsin. The program is specifically located in the Division of Public Health, Bureau of Community Health Promotion, WIC and Nutrition Services Section. CSFP is co-located with other food security and nutrition programs including The Emergency Food Assistance Program (TEFAP), the Special Supplemental Nutrition Program for Women Infants and Children (WIC), Supplemental Nutrition Assistance Education (SNAP Ed), WIC Farmers Market Nutrition Program (WIC FMNP), and Senior Farmers Market Nutrition Program (SFMNP).

The Deputy Secretary is entrusted with binding signature authority by the Secretary of the Wisconsin Department of Health Services. The positions within the Wisconsin DHS responsible for administering and staffing CSFP are outlined below.

|                                                |                                                  |
|------------------------------------------------|--------------------------------------------------|
| <b>Wisconsin Department of Health Services</b> | Secretary                                        |
| <b>Division of Public Health</b>               | Administrator                                    |
| <b>Bureau of Community Health Promotion</b>    | Director                                         |
| <b>WIC and Nutrition Section</b>               | Section Manager                                  |
|                                                | Food Security Unit Supervisor<br>(0.1 CSFP FTE)  |
|                                                | CSFP Coordinator<br><br>(0.8 CSFP FTE)           |
|                                                | Food Security Grant Specialist<br>(0.1 CSFP FTE) |

The CSFP program coordinator and Food Security Unit supervisor can be contacted at: [dhscsfpmail@dhs.wisconsin.gov](mailto:dhscsfpmail@dhs.wisconsin.gov)

### 4 Local agencies administering CSFP in Wisconsin

Local agencies are selected based on an application that reviews agency capacity, community outreach capabilities, and demographic profiles. Right of first refusal is given to agencies that currently provide the TEFAP program for access to food pantry networks, ability to serve several counties per agency, and expediency of DHS administration.

DHS has entered into contractual agreements to provide CSFP services with food banks and community action agencies in Wisconsin.

Wisconsin local agency coverage by county and contact information can be found on the [CSFP website](#).

## Local agencies

|                                                                                                                                                                              |                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proj 101 <a href="#"><u>Hunger Task Force (HTF)</u></a><br>5000 W Electric Avenue<br>Milwaukee, WI 53214-1966<br>414-777-0483                                                | Proj 102 <a href="#"><u>Racine Kenosha Community Action Agency, Inc. (RKCAA)</u></a><br>2113 North Wisconsin St.<br>Racine, WI 53402-4774<br>262-637-8377              |
| Proj 103 <a href="#"><u>West Central Wisconsin Community Action Agency, Inc. (WestCAP)</u></a><br>PO Box 308 525 2nd Street<br>Glenwood City, WI 54013<br>715-977-1167       | Proj 104 <a href="#"><u>Northwest Wisconsin Community Services Agency, Inc. (NWCSA)</u></a><br>1118 Tower Avenue<br>Superior, WI 54880<br>715-392-5127                 |
| Proj 105 <a href="#"><u>Community Action Coalition for South Central Wisconsin, Inc. (CACSCW)</u></a><br>1717 North Stoughton Road<br>Madison, WI 53704-2605<br>608-237-1255 | Proj 106 <a href="#"><u>Central Wisconsin Community Action Council, Inc. (CWCAC)</u></a><br>1000 Hwy 13 P.O. Box 430<br>Wisconsin Dells, WI 53965-0430<br>608-254-8353 |
| Proj 108 <a href="#"><u>Feeding American of Eastern Wisconsin (FAEW)</u></a><br>1700 W. Fond du Lac Ave.<br>Milwaukee, WI 53205<br>414-931-7400                              |                                                                                                                                                                        |

In accordance with federal regulations [CFR 247.34 Management reviews](#), DHS conducts on-site monitoring reviews at each local agency every two years. As part of this review, DHS evaluates all aspects of program administration including enrollment, certification procedures, nutrition education, civil rights compliance, food storage practices, inventory management, and financial management systems.

In addition to conducting on-site reviews, DHS evaluates program administration on an ongoing basis by reviewing agency program budgets, financial reports, audit reports, participation rates, inventory reports, and other relevant indicators.

## **5 Agreements entered into by the state agency**

### **CSFP annual grant reapplication**

DHS contracts annually with local agencies on the federal fiscal year cycle ([247.7](#)). Agencies must complete and submit the CSFP Annual Grant Reapplication materials before the last Friday in August to begin the reapplication process for the upcoming federal fiscal year. Required materials include written documentation of how the local agency will operate the program in accordance with federal and state requirements, a proposed FFY program budget with expense categories, any indirect expenses, and capital purchase requests, proof of insurance for CSFP food, warehouse inspection report, letter of civil rights compliance, and a complete list of agencies CSFP distribution sites. The state agency will make a decision on the local agency's application based on the minimum criteria:

1. The ability of the local agency to operate the program in accordance with federal and state requirements
2. The need for the program in the projected service area of the local agency
3. The resources available (caseload and funds) for initiating a program in the local area
4. For nonprofit agencies, the tax-exempt status, with appropriate documentation

### **DHS grant agreement template**

See Attachment B for the template of the agreement used between the Division of Public Health and each of the local agencies providing CSFP services. This agreement includes:

- Exhibit 1: CSFP Grant Addendum: Scope of Work with language specific to the program as required by Title 7 Codes of Federal Regulations 247 and 250.
- Exhibit 2: WI CSFP Caseload, Fiscal Allocation, and Service Area for the current fiscal year.

### **Tax exempt status**

Annually, prior to issuing fiscal year agreements, DHS determines local agency compliance with CSFP regulations that local agencies must have current public or private nonprofit status by cross checking each agency and each subcontractee with the IRS Automatic Revocation of Exemption List. Agreements will not be made with agencies until they are in good IRS standing.

## **6 Eligibility criteria, certification and distribution**

### **Categorical**

Wisconsin CSFP serves only elderly age 60 and over. Proof of date of birth and identity must be made with one of the following government-issued documents: passport, driver's license, or state issued identification.

### **Adjunctive eligibility and income**

#### **Adjunctive eligibility**

The applicant can be adjunctively eligible if they are currently approved for following federal programs:

- Supplemental Nutrition Assistance Program (SNAP) known as FoodShare in Wisconsin
- Food Distribution Program on Indian Reservations (FDPIR)
- Supplemental Security Income (SSI)
- Low Income Subsidy Program
- Medicare Savings Programs

Applicants who are adjunctively income eligible, as set forth in the above section, shall not be subject to the income limits established.

#### **Income eligibility**

Income eligibility requirements for elderly persons (aged 60 and over) enrolling in Wisconsin CSFP require household income limit at or below 150% of the Federal Poverty Income Guidelines. Applicants are asked to self-declare eligibility by stating in the affirmative if their total household income is at or below the program eligibility requirement for their household size.

The Wisconsin CSFP Income Eligibility Table for Seniors Age 60+ is updated annually using the guideline data provided by USDA each spring and is published within one week of receiving notice.

### **Local residency**

Proof of residency must be made with 1) housing lease, rental agreement, or receipt for rent showing local address, 2) recent (three month) utility bill showing a local address for service, or 3) local, government-issued identification showing local address.

Wisconsin does not require that an individual reside within the service area of the local agency when there is not a CSFP distribution site in the county in which they reside.

When an applicant lives outside the CSFP agency's service area, in a county served by another CSFP agency, program staff will offer information on the CSFP agency serving their home county. Program staff will also verbally remind them of the policy against dual participation (receiving benefits from

more than one agency or site in the same month). CSFP agencies must investigate when dual participation is suspected.

## **Nutritional risk**

Wisconsin does not use nutritional risk criteria for CSFP eligibility.

## **Certification**

All application and certification data will be recorded on [Certification and Food Package Pick-up form or electronically in agencies approved database](#). Information includes the applicant's name, address, phone number, email, name of a proxy authorized to apply for, recertify, and receive food on the participant's behalf, the date of the visit to apply for program participation, date of birth, household income, applicant's rights and responsibilities as described at [7 CFR 247.12](#), the current non-discrimination statement, applicant's signature, the date of certification or denial, and the signature and title of the person making the eligibility determination. In addition, complete the [Participant Agreement, Rights and Responsibilities](#).

Wisconsin allows the use of electronic storage of CSFP applicants files and accepts the use of electronic signature for CSFP applications, provided that the local agency can assure DHS that the same degree of confidence regarding the accuracy of eligibility determinations results from the electronic system as from a traditional, paper-based system.

## **Distribution**

Eligible participants will receive a monthly package of USDA foods, packaged in accordance with the food package guide rates established by FNS. Eligible participants or participant's assigned proxy are required to present some form of identification before receiving USDA foods. This is required to determine that the person receiving the food package is either the participant or a proxy that appears on the form before proceeding with issuance.

Local agency staff or volunteers will provide nutrition education and document the date of distribution of USDA foods to participants.

## **7 Three-year certification period**

Applications are valid for three years upon approval. The [certification period](#) is the period during which a CSFP participant may continue to receive benefits under CSFP without a formal review of eligibility.

Annually in October, a verbal recertification will take place. Recertification is determined if the following conditions are met:

- The participant's address is verified.
- Request the participant to self-declare that they still meet the adjunctive eligibility or income eligibility guidelines.
- The participant continues to have interest in the program.

All completed CSFP applications shall be retained for a period of three years plus the current year, including those of applicants determined to be ineligible and all previous applicants and participants.

Participants who have reached the end date of their certification period must be recertified before receiving additional program benefits. Blank [Certification and Food Package Pick-Up](#) form must be started, and all certification steps (except verifying age) must be followed.

## **8 Wait list and temporary certifications**

Recipient agencies will have a maximum caseload established annually based on allocation from USDA ([7 CFR 247.11](#)). When there are no caseload slots available to provide benefits to all eligible applicants, a wait list will be established, generally when the participation rate averages over 101% for several months. Recipient agencies will contact the state agency for approval prior to implementing a wait list.

### **Wisconsin will follow the following process for maintaining caseloads within allocations and allowing participants on waitlists to be enrolled:**

1. Recipient agencies will assess their geographical needs of their distribution agencies, service area and performance and adjust, as necessary.
  - a. Per the CSFP site agreement: either party may terminate the agreement with a thirty (30) day notice to the other party.
2. Recipient agencies will contact their distribution agencies for interest to continue to distribute CSFP and conduct waiting lists. If any sites are no longer interested in partnering, they can be removed from the program.
  - a. Per the CSFP site agreement: either party may terminate the agreement with a thirty (30) day notice to the other party.
3. Any participants impacted by the above distribution reduction, will be notified of nearby distribution sites, and transferring in participants must be placed at the top of the wait list.
4. Recipient agencies will follow operations manual procedure for participants with non-participation for two consecutive months:
  - a. Participants who do not pick up food packages for two consecutive months will be contacted by phone or letter to determine whether they want to continue to receive program benefits. This contact is to be documented on the [Certification and Food Package Pickup](#) form. Participants will be given 15 days from receipt of notice to respond. If no response is received, they will be terminated and sent a [Participant Determination Letter](#) making note of the reason for termination.
  - b. If the distribution site sends the letter, a copy must be retained at the site and kept with the participant record and one copy must be sent to the local agency.
  - c. If the participant contacts the program after 15 days and wishes to continue their participation, they may continue their current certification period if no wait list exists. If a wait list is in effect, they will be placed at the end of the wait list.
5. Recipient agencies that need to discontinue a participant from participation in the program prior to the end of the certification period due to the lack of resources (caseload slots) necessary to continue providing benefits to the participant, will provide written notice via the [Participant Determination LETTER](#), at least 15 days before the effective date of

discontinuance, **to the most recently applied applicants, that are being served over available slots.**

**Wait list procedure for all new applicants when no available caseload slots:**

1. Recipient agency will contact the state agency for approval prior to implementing a wait list and include their implementation plan.
2. New applicants will be screened for eligibility or ineligibility for CSFP benefits, or their placement on a waiting listing within 10 days of applying.
3. The applicant will receive the [Participant Determination Letter](#), a copy will be kept in the wait list records in order of application.
4. To enable the distribution site or local agency to contact individuals on the wait list when caseload space becomes available, the wait list will include applicant's name, date placed on the wait list and contact information for the applicant.
5. The wait list must be organized by date of application. Partially completed certification forms that contain the above-listed information may be placed in a wait list file in the same order as the wait list.
6. When a caseload slot becomes available, applicants must be contacted in order of the date of application. Document on the [Participant Determination Letter](#) the date the individual was contacted. If the individual misses their appointment and does not respond within 15 days, they may be placed at the bottom of the wait list.
7. Participants due for recertification must be allowed to continue the program as long as they are eligible, and caseload is adequate to continue serving.
8. Transferring in participants must be placed at the top of the wait list.

## **Temporary certification discontinued**

Wisconsin does not allow for temporary certifications.

## **9 Expansion plan, outreach to the elderly, and homebound elderly**

CSFP benefits are currently available from seven agencies who serve 62 of Wisconsin's 72 counties. Expansion to new service areas is possible when caseload increases are issued from USDA. Service areas are added based on high percentages and/or numbers of low-income seniors as well as other food insecurity indicators. To determine which new service agencies are adopted, the following criteria are used: experience and capacity to administer food security programs, experience and capacity to work with low-income seniors, current presence in the new communities, and proximity to the new service areas.

To find applicants to the CSFP in Wisconsin, local agencies implement outreach to senior centers, senior housing, senior meals on wheels programs, medical clinics, churches, service organizations, social service agencies, health departments, food pantries, and other organizations with elderly members or clients.

To support service to homebound seniors, local agencies will allow a proxy to perform application, certification, and food package pick-up for the participant. Program guidelines allow up to two proxies for each elderly participant. Proxy names are written onto each Certification and Food Package Pick-up Form. In addition, local agencies outreach to local aging and disability resource centers, senior centers, and meals on wheels programs to help locate new homebound seniors who might benefit from CSFP. Wisconsin CSFP recipient agencies have been successful in securing funding outside of the CSFP grant to implement Project Dash—using DoorDash to provide CSFP home deliveries where DoorDash is available.

## **10 Dual participation**

Dual participation occurs when a CSFP participant receives benefits from more than one agency or site in the same month ([7 CFR 247.19](#)). Local agencies are required to establish safeguards against dual participation by establishing procedures that identify participants who are participating in two different sites or by establishing specific service areas for each distribution site.

To prevent dual participation, the participant signs the [Participant Agreement, Rights, and Responsibilities](#) form that states they will “not participate or try to participate in more than one CSFP site or program at the same time.” To detect dual participation, all agencies are recommended to use an electronic database as a means to detect dual participation within the service area. CSFP agencies must investigate when dual participation is suspected.

## **11 Storing and distributing USDA foods**

All CSFP food is ordered by the state agency. Per [CFR 7 – 250](#): Local CSFP agencies are contracted to receive deliveries, forward receipt documentation, store USDA foods, assemble food packages, and deliver food packages to their distribution sites. All agencies receive USDA foods through the Kansas City, MO, Multi-Food Warehouse, in addition to Hunger Task Force and Feeding America Eastern Wisconsin–Appleton, receive commodities directly distributed from the vendor. Additional policies and procedures for food handling can be found in Section VII of the CSFP Operations Manual (Attachment B.)

## Wisconsin CSFP food storage locations

USDA food is received, stored, and distributed from the following food storage facilities in Wisconsin.

|                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Proj 101 <a href="#"><u>Hunger Task Force (HTF)</u></a></p> <p>5000 W Electric Avenue</p> <p>Milwaukee, WI 53214-1966</p> <p>414-777-0483</p>                                                                                                          | <p>Proj 102 <a href="#"><u>Racine Kenosha Community Action Agency, Inc. (RKCAA)</u></a></p> <p>2113 North Wisconsin St.</p> <p>Racine, WI 53402-4774</p> <p>262-637-8377</p> <p><b>*Receives built CSFP boxes from Hunger Task Force*</b></p> |
| <p>Proj 103 <a href="#"><u>West Central Wisconsin Community Action Agency, Inc. (WestCAP)</u></a></p> <p>PO Box 308 525 2nd Street</p> <p>Glenwood City, WI 54013</p> <p>715-977-1167</p> <p><b>*Receives built CSFP boxes from FAEW*</b></p>             | <p>Proj 104 <a href="#"><u>Northwest Wisconsin Community Services Agency, Inc. (NWCSA)</u></a></p> <p>1118 Tower Avenue</p> <p>Superior, WI 54880</p> <p>715-392-5127</p> <p><b>*Receives built CSFP boxes from FAEW*</b></p>                 |
| <p>Proj 105 <a href="#"><u>Community Action Coalition for South Central Wisconsin, Inc. (CACSCW)</u></a></p> <p>1717 North Stoughton Road</p> <p>Madison, WI 53704-2605 608-237-1255</p> <p><b>*Receives built CSFP boxes from Hunger Task Force*</b></p> | <p>Proj 106 <a href="#"><u>Central Wisconsin Community Action Council, Inc. (CWCAC)</u></a></p> <p>1874 Hwy 13</p> <p>Friendship, WI 53934</p> <p>608-254-8353</p> <p><b>*Receives built CSFP boxes from Hunger Task Force*</b></p>           |
| <p>Proj 108 <a href="#"><u>Feeding American of Eastern Wisconsin (FAEW)</u></a></p> <p>1700 W. Fond du Lac Ave.</p> <p>Milwaukee, WI 53205</p> <p>414-931-7400</p>                                                                                        |                                                                                                                                                                                                                                               |

## **Annual physical inventory of USDA food**

Local agencies must complete a physical inventory of all USDA Foods at the end of each month. Local agencies will follow First In, First Out (FIFO) principles and ensure USDA foods are distributed well before the expiration or “best if used by” dates.

DHS or other entity independent of the local agency will conduct an annual on-site physical reconciliation of CSFP food inventory and a warehouse review, as necessary, for each CSFP local agency, defined as a sub distributing agency per CFR 250.

The results from each physical inventory are reconciled with the agency inventory records reported on the current month’s USDA Food Programs Reporting System (FPRS) FNS 153 report.

## **Claims for Food Loss**

### **Pursuing claims against local recipient agency**

DHS follows the standards and procedures in the [FNS Instruction 410-1: Claims for Losses of Donated Foods and Related Administrative Losses – Procedures for the State Distributing Agency](#) document to determine steps towards restitution for USDA food losses over \$500 per incident.

CSFP food loss is also a part of the monthly FNS-153 reporting process.

### **Pursuing claims against a participant**

A participant found to be committing dual participation will be discontinued from participation at more than one CSFP site. If the dual participation resulted from the participant or participant’s caretaker making false or misleading statements, or intentionally withholding information, the local agency must disqualify the participant from CSFP, unless the local agency determines that disqualification would result in a serious health risk. The local agency will also initiate a claim against the participant to recover the value of CSFP benefits improperly received. When the individual's participation in CSFP is discontinued or disqualified, the local agency will notify the individual of the discontinuance or disqualification and include the agency’s fair hearing process.

The state agency shall ensure the local agency makes claims against the participant for repayment when necessary. The state may waive the claim if it determines serious nutritional risks are involved. The policy requires that local agency procedure must include the following: 1) a letter with a statement demanding repayment, 2) additional collection attempts if necessary, and 3) maintain all records for four years.

## **Food holds and recalls**

Occasionally a CSFP food item is subject to a hold or recall due to a safety concern. USDA uses the Web-Based Supply Chain Management System (WBSCM) to send notifications to the specific recipients of the targeted food. DHS assigns the CSFP coordinator as the Lead Holds and Recalls (H&R) staff. The Lead H&R staff will be responsible for weekend and evening coverage. The food

security site supervisor and any future DHS CSFP staff will be assigned backup H&R staff role. All DHS CSFP staff will be designated the WBSCM recall specialist role to ensure full coverage when the lead H&R staff is not available.

### **Holds and recalls (H&R): State CSFP staff responsibilities**

|                                                       | Lead H&R staff | Weekend or evening coverage | Backup H&R staff | WBSCM recall specialist role |
|-------------------------------------------------------|----------------|-----------------------------|------------------|------------------------------|
| CSFP coordinator<br>(Jennifer M. Miller)              | x              | x                           |                  | x                            |
| Food security site supervisor<br>(Jennifer A. Putzer) |                |                             | x                | x                            |

## **12 Nutrition Education and Other Public Assistance Programs ([7 CRF 247.18](#))**

Local agencies are responsible for making nutrition education and other public assistance programs available to all program participants.

At a minimum, local agencies distribute nutrition education information at a minimum of four times per year with monthly food packages in the form of a flyer, newsletter, or handout. Nutrition education can be provided at certification, food package pick-up and recertification. The state agency has developed a nutrition education resource list for local agency use.

Nutrition education will be provided to each participant at each distribution. The local agency will provide nutrition education that can be easily understood by participants and is related to their nutritional needs and household situations. The nutrition education will include 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. The nutrition education will also consider for specific ethnic and cultural characteristics whenever possible. Local agencies may use CSFP foods to conduct cooking demonstrations as part of the nutrition education provided to program participants, but not for other purposes.

## **Other public assistance programs**

Per [§247.14](#) local agencies will provide information to participants regarding FoodShare and SNAP, Supplemental security income benefits, Medicare, Senior Farmers Market Nutrition Program (SFMNP), and any other programs.