STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

P.O. Box 42560 ● Olympia, Washington 98504-2560 ● (360) 902-1800

Updated Guidance on Client Intake Requirements for Food Assistance Contractors and Subcontractors

Background & Context:

Over the last year, client intake documentation and barriers to client access have been raised as important issues to WSDA and the WSDA Food Assistance Advisory Committee. In December 2020, WSDA provided a letter that clarified the required eligibility and data collection requirements for each of the Food Assistance programs. Since that time, WSDA has taken additional steps to reduce client access barriers. This letter includes updated guidance on client intake requirements and service areas. Please review these requirements and compare them with your current program intake and service practices to ensure your organization is in alignment with these requirements.

No WSDA programs require client documentation, except for CSFP (Commodity Supplemental Food Program). All household income is self-declared. Under no circumstance should a pantry require a client's social security number, proof of citizenship, proof of income, proof of name, proof of address, or proof of household size.

You should not require documentation to verify eligibility or assist in your data collection practices. This includes pieces of mail, school records, or medical records. If you have questions about these policies, please contact the WSDA lead contractor for your area. If you are a lead contractor, please work with your WSDA Food Assistance Regional Representative. We understand that contractors and other funders may require additional data collection outside of WSDA programs. If this applies to you, then please work with those organizations to clarify the data needed and why it is required.

Food Assistance programs are not designed to discriminate against people who are food insecure. In some cases, despite our personal values, food access policies can inadvertently discriminate against specific groups of people. For instance, there are many reasons why a person might be reluctant to share their ID or other documentation with someone they do not know. Examples include but are not limited to:

- People who have a different gender identity than is printed on their ID
- People who live in the U.S. outside of the legal immigration system
- People who are afraid of identity theft or government overreach
- Children without ID who are picking up food on behalf of their family
- People who do not have an ID
- People who are unsheltered/homeless, or do not have a permanent address
- People with an ID that was lost or stolen

These are all valid reasons why a person might decline to show their ID or other documentation. **None of these reasons should prevent a person or family from receiving food.**

Your organization may have written or unwritten policies to bend or disregard requirements when presented with any of the above situations. This, too, can cause a person to be discriminated against if policies are applied inconsistently so that one person makes an exception and another person does not. Research shows that a negative experience like this can result in people in need not seeking necessary food services from your organization. Instead, we recommend taking every step to guarantee that all people receive food without these barriers.

In addition to this letter, WSDA has committed to offering more training, tools, and resources on this issue. The WSDA Food Assistance Advisory Committee continues to work on additional measures that will further reduce client barriers while remaining compliant with program regulations. Historically, WSDA has allowed pantries to request but not require some form of ID or mail to assist with the intake process. Requesting ID means asking for ID but still serving the client food if they cannot or will not provide ID, whereas requiring ID means not allowing the client to receive the food if they cannot or will not provide ID. Future discussions will focus on needed alternatives to this approach, conversations about service areas, further removal of barriers to client access, and considering policy changes that specifically prohibit requesting client documentation. **Listed below are Client Intake Requirements for each of our programs.**

EFAP and EFAP–Tribal Client Intake:

Required Eligibility:
- Eligible clients are persons who self-declare they are not able to purchase enough food for their subsistence
- Currently, local agencies determine client intake processes. There are **no documentation requirements for clients participating in EFAP**

Data Collection Requirements (Does Not Require Client Documentation):
- Household Size
- Ages of all members of the client's household (optional through June 30, 2021)
- Is this a new or returning client (returning clients should be counted as new on the first visit each year)
- We do not need existing clients to resubmit their information at every visit to a food pantry. You may ask returning clients to tell you if any of their information has changed

Service Areas:
- A pantry should serve a client if they reside in the state of Washington. Again, ID or documentation cannot be required. If appropriate, the provider may refer the client to the agency typically servicing the area in which the client resides, or the tribe that has established jurisdiction over the area where the individual lives. **Never deny people a normal allocation of food (emergency or overnight-only bags are not necessary to stay in compliance with service area rules).**
- As a temporary measure, we have allowed counties to determine service area boundaries:
  - Food pantries within a county or multi-county region may agree to define their service area boundaries for the purpose of equitably allocating resources.
  - Tribes may also establish service area boundaries for their food pantries, counties to determine service areas eligibility but not to enforce client residency requirements.
- Food pantries are to provide service to all clients seeking food.

Tips for making your intake process more inclusive:
- Consider adding a box on your intake form that clients can check if their information changes
- Instead of asking clients for ID if they do not speak English as their first language, offer intake or registration forms in the language that they read and write in
- Consider removing information requests that are not truly required
- Offer a way for clients to self-register, providing only the information they are comfortable sharing

TEFAP Client Intake at Food Pantries:

Required Eligibility at Food Pantry (SELF-DECLARED):
- Meet the State determined Income Eligibility Requirement (currently 400% of Federal Poverty Guidelines)
- Reside in the state of Washington, no minimum length of residency, ID, or documentation required

Data Collection Requirements (Does Not Require Client Documentation):
- Self-declared name, address, and household size, or ensure the information on file is still accurate for subsequent visits
- For people who are unsheltered/homeless or do not have a permanent address, please ask them to write "homeless" for their address
- Under no circumstance should a pantry request or require a client's social security number, proof of citizenship, proof of income, or proof of household size (such as school or medical records)
- Signatures are optional
- These guidelines must be posted and visible at every distribution site

Service Areas:
- A pantry should serve a client if they reside in the state of Washington. Again, ID or documentation cannot be required. **Never deny people a normal allocation of food (emergency or overnight-only bags are not necessary to stay in compliance with service area rules).**
  - As of 03/26/21 – The requirement for clients to reside in the organization's service county has been removed. Now the only requirement an organization may impose is that they reside within this state.
- Clients may receive TEFAP commodities from more than one organization.

Tips for making your intake process more inclusive:
- Review which data you collect for funders and organizations other than the WSDA.
  - Which of these organizations still fund your work?
  - What data can you safely stop collecting?
  - How else can you collect this information without asking clients for it?
  - Is everyone who conducts client intake trained on what to do if someone declines to answer?

TEFAP Client Intake at Meal Programs:

Required Eligibility at Meal Programs (shelters, soup kitchen):
- There is not a federal standard or requirement for determining the eligibility of people to receive prepared meals

- They are presumed to be needy because they seek meals at an approved TEFAP Site
- Do not ask for information about clients' household income
- Sites do not have to maintain records of the names of people to whom they serve meals
- Meal recipients do not have to sign for their meals

Data Collection Requirements:
- Total number of meals served to clients in each month
- Your contractor may ask for additional data (but nothing that requires documentation)

Tips for making your intake process more inclusive:
- If you have an intake process, consider other ways to collect data without registration

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CSFP Client Intake:

CSFP is not available in all counties in Washington State and has an assigned client caseload limit for participating counties. This is a federal program that specifically targets people over 60 who need food assistance. Because these benefits are not universal, the USDA asks us to verify the person's age, name and address.

Required Eligibility:
- Be 60 years or older
  - Clients may now self-attest their age. Verification of age through documentation (such as birth certificate, Driver's License, State ID card, or other similar types of documents) is not required.
  - ID is required to be shown each time the client receives CSFP commodities
- Client self-declares that their income limit is at or below 130% of the Federal Poverty Income Guidelines

Data Collection Requirements:
- Name and address
  - Must provide proof that they reside in a county served by CSFP in Washington. Address is verified through either:
    - Mail
    - Driver's License
    - Utility Bill
    - Private Insurance Card
    - Rent/Lease Agreement
    - Rent Receipt
- Client self-declares household size
- Client self-declares racial and ethnic data which must be provided for annual reporting purposes to USDA. An individual's data is not provided, just aggregate data from participating CSFP sites
- Certification is valid for 12 months, with the ability to extend the certification for two additional 12-month periods (informal certification process used for this)
  - Informal certifications can happen over the phone, mail, email, fax, or in person and confirm that the person is still eligible for the program
  - Signature is required at the time of initial certification, but not required each time a client receives CSFP commodities in between certifications
- If using a proxy, then the proxy must provide identification when picking up CSFP foods on behalf of the participant

        o   Proxy is valid for up to 36 months

Tips for making your intake process more inclusive:
- Create a policy to automatically extend a client's certification beyond the first 12-month period if they still need food assistance
- Offer outreach and support to community groups that primarily serve people who are over 60

References:

EFAP Procedures Manual *

EFAP–Tribal Procedures Manual *

TEFAP Procedures Manual *

CSFP Procedures Manual *

7 CFR Part 251 (TEFAP Regulations)

7 CFR Part 247 (CSFP Regulations)

USDA FNS Memo: TEFAP Local-Level Requirements

USDA FNS TEFAP COVID-19 Q&A's

USDA FNS CSFP COVID-19 Q&A's

* Revisions to the manuals are in the process of being updated to reflect the guidance above.