

Food Distribution National Policy Memorandum

United States Department of Agriculture

DATE: March 31, 2003

Food and Nutrition Service

POLICY NO.: FD-011: Commodity Supplemental Food Program (CSFP)

3101 Park Center Drive **SUBJECT:** Caseload Assignment and Utilization

Alexandria, VA 22302-1500 The attached document is intended to serve as guidance on caseload assignment and utilization in the Commodity Supplemental Food Program (CSFP). It responds to questions raised by the National CSFP Association Board of Directors, State agencies and FNS Regional Offices.

Despite receiving a single caseload from FNS, some State agencies are still allocating separate women-infants-children (w-i-c) and elderly caseloads to their local agencies. Allocating separate caseloads to local agencies negates the flexibility in caseload management afforded by the single caseload system. With a single caseload, local agencies can immediately serve elderly with unutilized caseload slots, rather than waiting for caseload designated specifically for that group to open up. Thus, we strongly recommend that States allocate a single caseload to their local agencies.

for

SUZANNE RIGBY Acting Director

Food Distribution Division

Attachment

Date Originally Issued: 04/07/1999 (Unnumbered)

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<u>Commodity Supplemental Food Program (CSFP): Guidance on Caseload</u> Assignment and Utilization

Since State agencies now receive a single caseload, must they still provide priority in service to women, infants, and children (w-i-c)?

Yes, the priority requirements in service to eligible population groups established in program regulations under 7 CFR 247 must be followed. Generally, this means that, at local sites, women, infants, and children (w-i-c) must receive priority in service over the elderly. However, local sites may serve w-i-c and elderly on a first-come, first-serve basis until all caseload slots are filled. Once all caseload slots are filled, w-i-c who apply and are determined eligible must be served with the next available caseload slots. This means that, when certification periods of elderly participants expire, these slots must be used to serve eligible w-i-c applicants, and the elderly are placed on a waiting list until more slots become available.

May a State agency serve more participants than its assigned caseload in a particular month?

Yes, it may. However, the State agency may not serve more participants than its assigned caseload on an average monthly basis for the caseload cycle. The State agency is responsible for monitoring its participation statewide on a monthly basis to ensure that it will not exceed the assigned caseload for the caseload cycle. If participation exceeds the assigned caseload for two consecutive months, or by a large amount in one month, the State agency is advised to institute management procedures to ensure that the assigned caseload will not be exceeded for the caseload cycle.

Although State agencies are assigned a single caseload, may they assign separate w-i-c and elderly caseloads to their local agencies?

Yes, they can. However, assigning separate w-i-c and elderly caseloads to local agencies takes away the flexibility in service afforded by a single caseload. The advantage to a single caseload is that, as long as local agencies have unfilled caseload slots, they may serve elderly persons as soon as they are determined eligible for benefits (rather than waiting for elderly slots to become available in the old system). This provides more efficient service and greater use of the assigned caseload. This will also improve a State's chances to retain its base caseload, and to receive expansion caseload, going into the next caseload cycle. For these reasons, we strongly recommend that States assign a single caseload to their local agencies.

Without actually assigning separate caseloads, may State or local agencies "set aside" caseload for part of the caseload cycle?

Yes, they can. States would probably set aside caseload if they were planning to open a new site during the caseload cycle. Local agencies may choose to set aside caseload for service to w-i-c (but not elderly) if they are planning extensive outreach efforts early in the caseload cycle, or if the WIC Program is expecting to reduce participation due to funding shortfalls. However, if caseload slots remain unfilled well into the caseload cycle, we recommend that efforts be made to increase service to the elderly.

Since States now receive a single caseload, why must they make requests for expansion caseload separately for w-i-c and elderly?

Just as State and local agencies must provide priority in service to w-i-c, FNS must give priority to program expansion that would serve more w-i-c. We are responsible for directing resources first and foremost to the service of this priority group. For this reason, Federal regulations require that we first consider expansion requests to increase service to w-i-c, and then consider expansion requests to increase service to the elderly.

If a State requests, and receives, expansion caseload for w-i-c, must it then require local agencies to serve only w-i-c with this caseload?

No. States should assign this caseload to those local sites where an increase in service to w-i-c is most needed, and locals should perform outreach activities to try to enroll as many w-i-c as possible. However, once the State agency receives its single caseload assignment ("base" plus expansion), there is no restriction on the use of it, except that, at the local level, w-i-c must receive priority in service, as described previously. As previously mentioned, we recommend that States do not place any further restrictions on their local agencies by assigning separate w-i-c and elderly caseloads. States must keep in mind, however, that expansion caseload requested for w-i-c that is used to serve elderly instead will have an impact on future requests for w-i-c expansion.

Since expansion requests for w-i-c have a higher priority than expansion requests for the elderly, should a State then simply request expansion for w-i-c, even though it projects a need for increased service to the elderly, in order to give it a better chance of approval of the expansion request?

No. If a State makes an expansion request for w-i-c that is not supported by w-i-c participation figures over the last few years (i.e., if w-i-c participation has shown a consistent decline), the request will not be approved. Hence, unless the State also makes a request for expansion caseload to serve elderly, it will not receive any expansion at all. If a State projects a need for increased service to the elderly, it

should specify that the expansion request is for the elderly. If elderly participation figures support the request (i.e., if elderly participation has increased), expansion caseload will be approved, to the degree that funding permits.

What criteria does FNS use in determining if a State agency's request for expansion caseload is to be approved?

The amount of expansion caseload that is assigned is dependent on the total funds available for caseload assignment. If funds are limited, FNS assigns expansion caseload to those State agencies that are most likely to utilize it, based on previous participation and caseload utilization data. Specific requests to increase service to women, infants, and children are given priority over requests to increase service to the elderly. The specific factors that FNS considers in assigning expansion caseload include:

- (1) Program participation of women, infants, and children, and the elderly in the State, in the previous fiscal year.
- (2) The percentage of caseload utilized by the State in the previous caseload cycle.
- (3) Program participation trends in the State in previous fiscal years.
- (4) Other information provided by the State agency, including the projected expansion of the program to new local areas in the State. However, precedence is given to expansion requests supported by program performance data.

If funds remain after accounting for all reasonable expansion caseload requests, FNS assigns caseload to new States that have approved State Plans.