



Strengthening The Emergency Food Assistance Program:

A SURVEY OF MULTI-STATE FOOD BANKS

BACKGROUND

The Capital Area Food Bank (CAFB) has worked together with federal, state, and local governments on a range of programs to alleviate hunger since its founding in 1980; few are as critical to neighbors as The Emergency Food Assistance Program (TEFAP).

TEFAP has evolved considerably since it originated as a temporary farm support in 1983, to mandatory entitlement in 1988, and now as a central staple in our country's effort to end hunger. As we approach the 40th anniversary of the program and assess the cumulative impact of investing more than \$35 billion in TEFAP (inflation adjusted), we have an opportunity to recognize the regulations, policies, and practices that the federal government can implement to continue improving TEFAP's reach and impact.

CAFB is one of only six food banks in the Feeding America network that serves three states, granting it a unique snapshot of TEFAP's efficacy, room for growth, and variations in state-based administrative approaches. For quite some time, CAFB has wondered whether our experience administering TEFAP across several states is distinct. Through this effort, we have concluded that our experience is in fact quite similar to many other organizations within our nation's hunger relief infrastructure.

The findings in this brief represent the expertise and perspectives of one-tenth of the Feeding America network, serving more than half the country's states.

Now is the time to reflect, again, on how we can continue to make this impactful program more meaningful and accessible—by incorporating takeaways from the pandemic and lessons learned since the 2018 Farm Bill.

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EXECUTIVE SUMMARY

CAFB surveyed 20 food banks serving 29 states to understand opportunities for improvement, identify lessons learned, and highlight best practices and policies in the TEFAP program. Overwhelmingly, stakeholders across the United States believe this is an effective program, and these findings and recommendations will only further TEFAP's reach and role in hunger alleviation.

KEY FINDINGS

Neighbor access is inequitable across the country due to variations in state approach.

Food banks do not receive the administrative funding necessary to cover TEFAP costs.

Cancellations are significant, and input on quantity and type of food is low.

Funding for entitlement product is not sufficient to address need.

Inconsistencies across states create administrative burdens for food banks and partner agencies.

Distribution flexibilities enabled meaningful reach and impact to neighbors.

Distortions exist in the information supply chain with implications for operations.

“TEFAP has become a vital mechanism to provide food to those in need. However, it has a vast, untapped potential which can be realized through meaningful policy reform.”
—TRI-STATE FOOD BANK

KEY POLICY RECOMMENDATIONS

U.S. CONGRESS

Remove or loosen income threshold for eligibility.

Increase baseline entitlement funding to \$450 million, and index to inflation.

Increase administrative funding.

Appropriate for infrastructure grants.

Create mechanisms to fund administrative costs for bonus and non-recurring foods.

Require annual inclusion of food bank input into state distribution plans.

USDA, FOOD & NUTRITION SERVICE

Standardize neighbor access and eligibility.

Reduce cancellations and turnaround time for purchasing and delivery.

Increase food bank input in quantity and type of product.

Incentivize and instruct states to streamline reporting, systems, and interstate service.

Clarify misnomers in information supply chain.

METHODOLOGY AND SNAPSHOT OF RESPONDENT FOOD BANKS

From November 2021 through July 2022, CAFB engaged all 22 Feeding America food banks with multi-state service areas to better understand the complexities involved in administering TEFAP and to assess whether consensus exists on aspects of client experience, reform, and best practice.¹ The primary methods of information and data collection included:

SEMI-STRUCTURED INTERVIEWS

Conducted with 20 multi-state food banks from November 2021 through March 2022.

ONLINE SURVEY

A comprehensive, 70-question survey populated by 18 multi-state food banks from June 15th through July 29th, 2022.

STAKEHOLDER CONSULTATION

Feeding America and the Food and Nutrition Service (FNS) within the United States Department of Agriculture (among others) provided technical expertise and assistance throughout the entirety of this project.

“

“History has demonstrated the critical role of TEFAP. Policymakers can help make the program a vital component of the safety net, and our country’s commitment to ending hunger.”

—FOOD BANK OF
NORTHERN NEVADA

DEFINITIONS

Administrative flexibilities

Models of operation and distribution, allowed under existing federal authority and optional for state agencies to implement, designed to make a program easier, safer, or more responsive to need based on circumstance.²

Cancellations

Any TEFAP order that a food bank did not receive after it was placed.

Cooperative agreements

Non-binding, formal documentation that stipulates reciprocal practices between two or more states.

Multi-state food banks

Feeding America network food banks whose designated service areas include more than one state.

Neighbor

An individual utilizing the services of a food bank or partner agency.

Respondent food banks

Food banks that responded to questions referenced throughout this report.

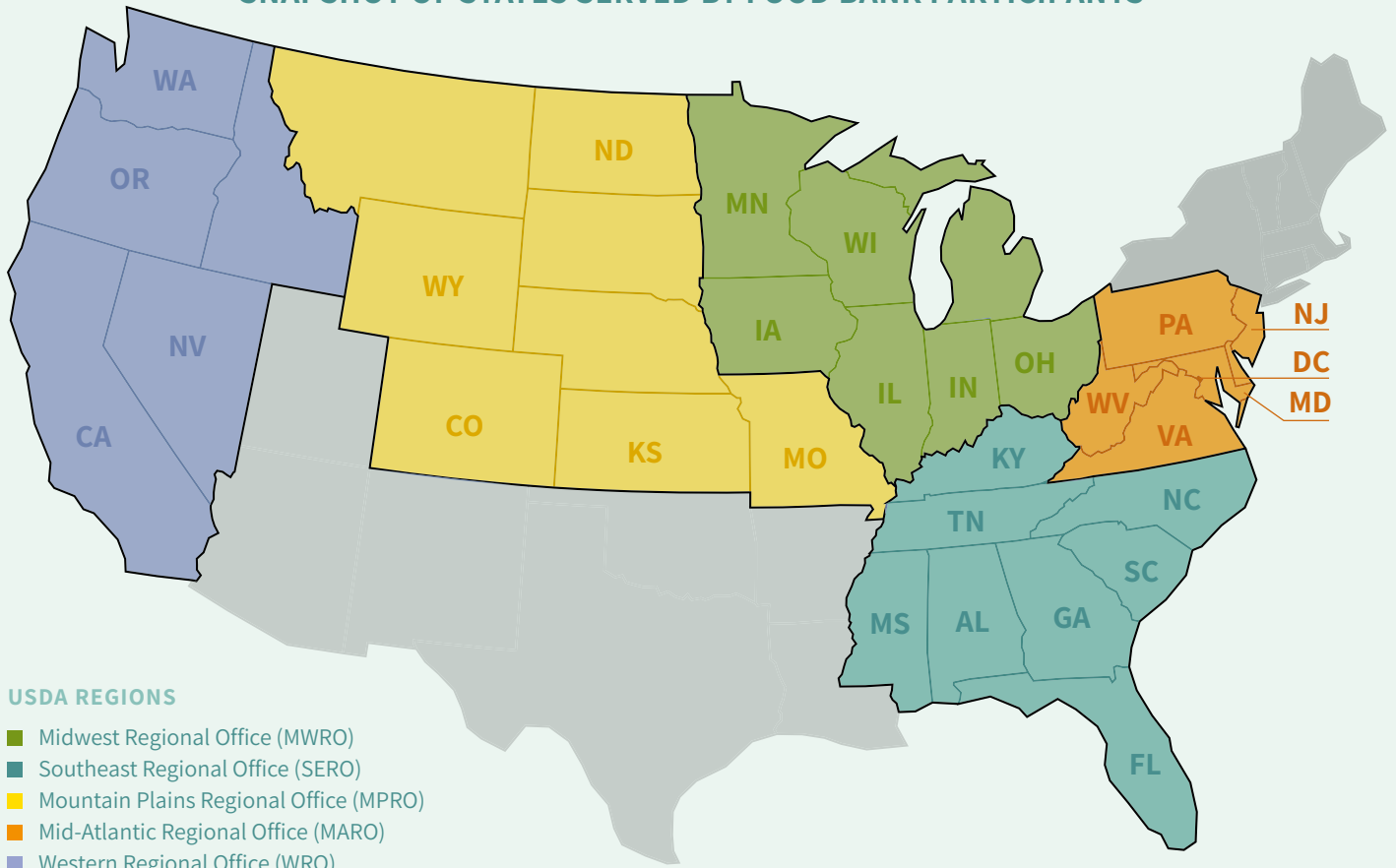
State agency

The state-level, governmental agency tasked with administering TEFAP.

TEFAP partner

A nonprofit organization, such as a food pantry or soup kitchen, that provides TEFAP food to neighbors, by way of a Feeding America food bank.

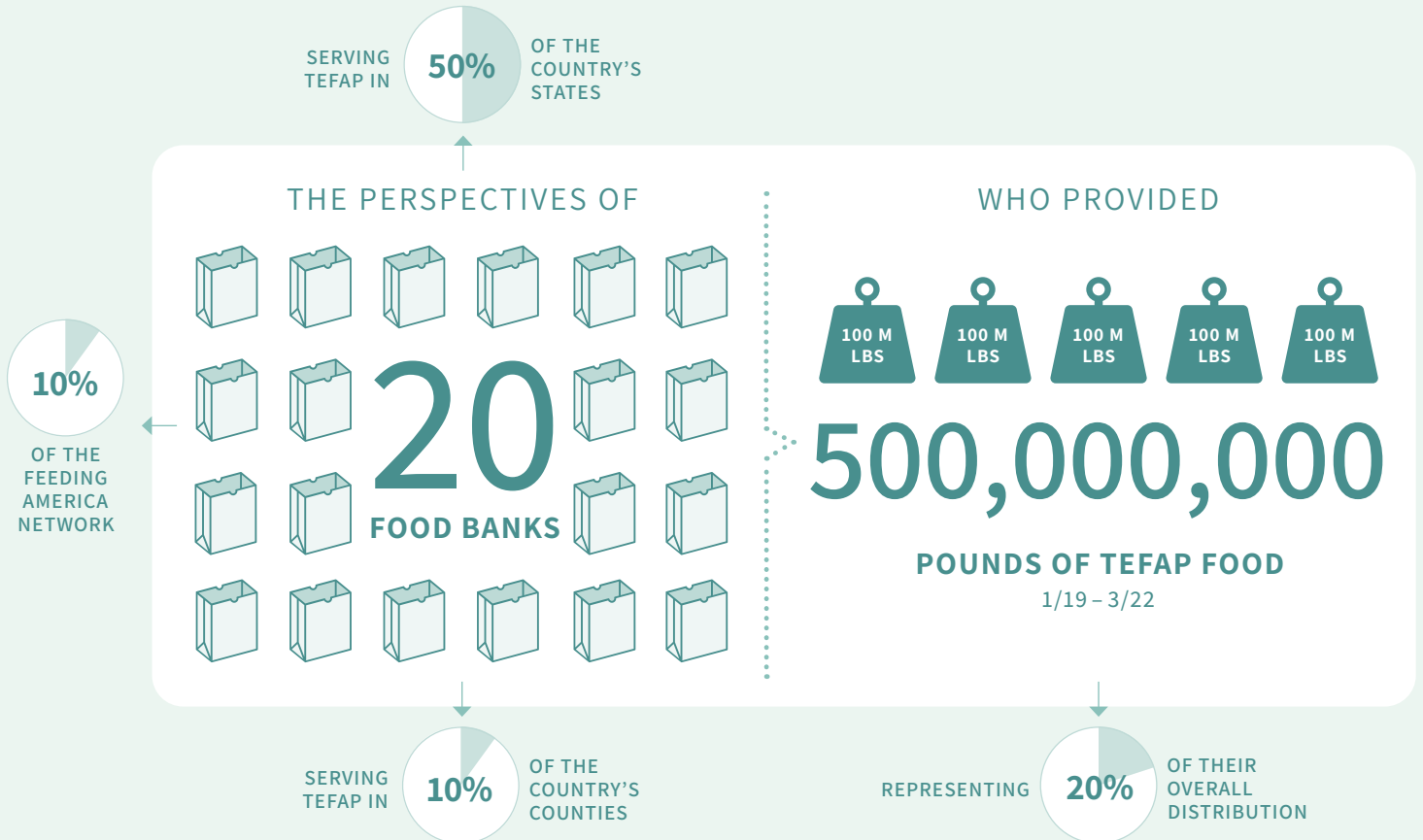
SNAPSHOT OF STATES SERVED BY FOOD BANK PARTICIPANTS



USDA REGIONS

- Midwest Regional Office (MWRO)
- Southeast Regional Office (SERO)
- Mountain Plains Regional Office (MPRO)
- Mid-Atlantic Regional Office (MARO)
- Western Regional Office (WRO)

FINDINGS REPRESENTED



FINDINGS

NEIGHBOR ACCESS VARIES SIGNIFICANTLY ACROSS THE COUNTRY

Dissimilarities in eligibility determination create inequity—particularly for neighbors residing in the service areas of multi-state food banks, where it is commonplace to live, work, or travel across states. For example, neighbors must meet their state’s income requirements for the program, which can vary from 130 to 400 percent of the federal poverty guideline.³ This means two families that live just across state lines, earning the same wage and struggling to access their next meal, may or may not be able to put TEFAP food on their tables. The following infographic portrays facets of current eligibility determination as articulated by respondent food banks; predominant state practices are bolded throughout.






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“One time somebody told me you can come once a month to get emergency food. When I gave them my ID, they told me, “You were here this month already.” But I didn’t have anything to eat. I didn’t want to go back the next month, but I did because I needed food.”

—JOYCENE MOORE, WASHINGTON, DC

Policymakers deserve great credit for their level of investment and their ingenuity in creating and modernizing the program. However, the variance in neighbor access makes the program difficult for food banks to administer across multiple states and creates inequity for neighbors across the country.

NEIGHBOR ELIGIBILITY REQUIREMENTS

	 I.D.	 INCOME	 SIGNATURE	 PARTICIPATION	 ADDRESS
RESTRICTIVE	ID Required	Verification Required X ≤ 185%	Physical Signature Required	County of Residence Annual or Monthly	Full Address with Verification
MODERATE	ID Requested	Self-Attestation X > 185%	Alternative Verification Required	State of Residence Weekly	Address or Alternative without Verification
ACCESSIBLE	ID Collection Disallowed	Self-Declaration of “Need” No Income Guideline	No Requirement	No Geographic Restriction No Frequency Restriction	No Address Required

NEARLY **80%** of respondent food banks support a more streamlined experience for neighbor access.

Bold text indicates methods most commonly used by respondent food banks’ states

OBSTACLES EXIST IN COSTS, CANCELLATIONS, AND CHOICE

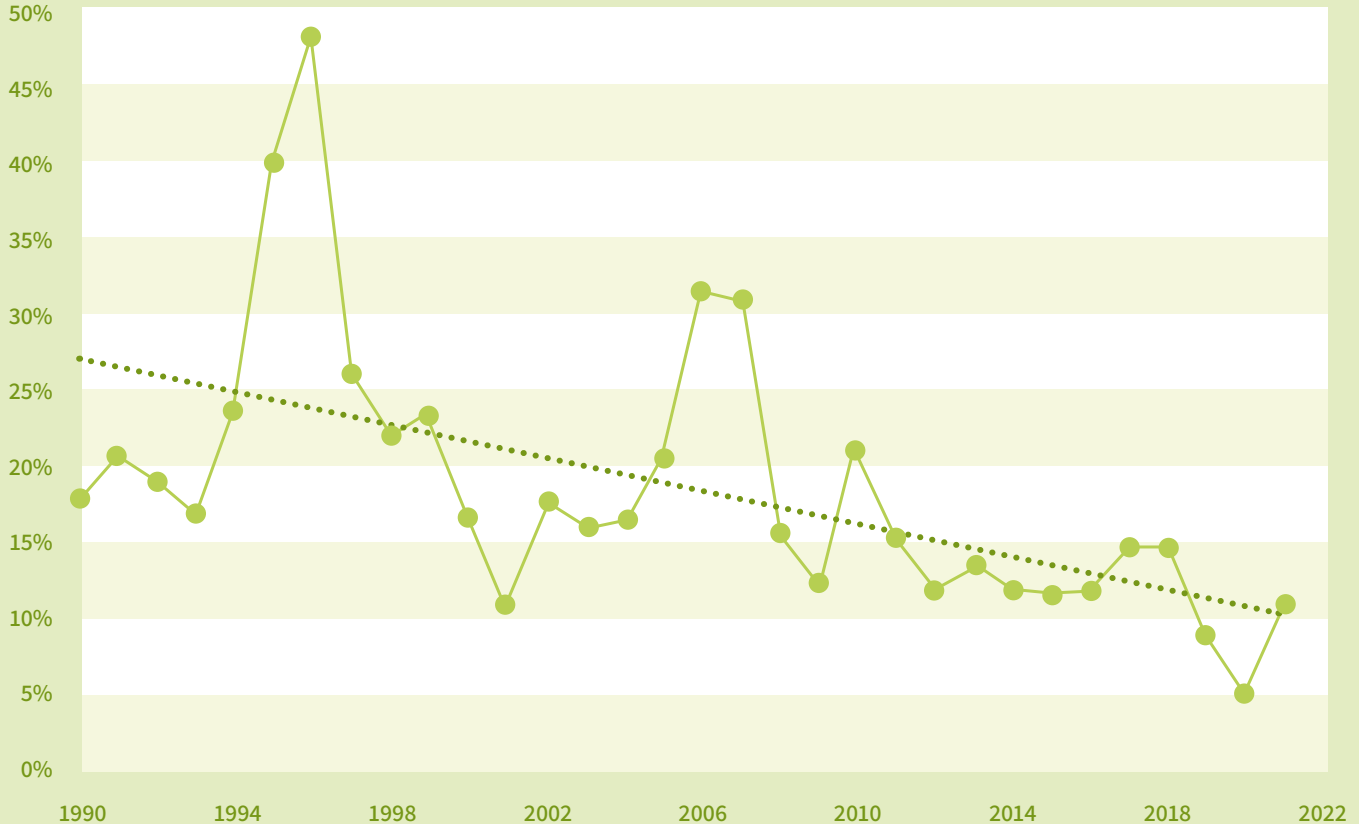
COSTS TO ADMINISTER ARE GREATER THAN FUNDING PROVIDED

Administrative funding, a critical aspect of TEFAP, provides support to food banks to cover the costs of administration from order to delivery. Since 2019, respondent food banks have spent down **more than 99 percent** of administrative funding through March 2022. Findings suggest that—although respondent food banks are using nearly every dollar of this funding, including an influx of temporary COVID-era stimulus—the **program is still not covering full operating costs for food banks.**

This finding is indicative of historic trends in Table 1. As a percentage of overall food funding, the amount provided by Congress to all hunger relief organizations to administer TEFAP has been on a troubling downward trend since the late 1990s.⁶

Respondent food banks indicated that, on average, out of pocket costs to administer the program were 9 and 16 percent for federal fiscal years 2021 and 2022, respectively.⁵

TABLE 1: ADMINISTRATIVE FUNDING AS A PERCENTAGE OF TOTAL TEFAP FOOD FUNDING (INFLATION ADJUSTED)



TEFAP FOOD FUNDING INCLUDES: ENTITLEMENT, BONUS, DISASTER, COVID-19, AND TRADE MITIGATION.

OBSTACLES EXIST IN COSTS, CANCELLATIONS, AND CHOICE (CONTINUED)

CANCELLATIONS PROHIBIT EFFICIENT AND EFFECTIVE ADMINISTRATION

Entitlement and bonus funding serve as the bread and butter of the TEFAP program. While these funding streams differ slightly in terms of sourcing, ordering, and type, both funding types generated consternation from respondent food banks due to the number and volume of cancellations. From January 2019 through March 2022, respondent food banks experienced nearly 2.1 million and just under half a million cancellations in bonus and entitlement cases, respectively; **this equates to an estimated 50 million meals which respondent food banks have been unable to provide (or have had to acquire through purchasing or other sources).**^{7,8}

FUNDING AND INPUT LEVELS REMAIN LOW

Food banks indicate a desire to have a greater level of input into the availability of food. Seventy-five percent of respondent food banks express a very low or modest level of input on type and quantity of products in at least one of their states. This marginal level of input, specifically on quantity, has far-reaching impacts outside of service to neighbors; nearly 70 percent of respondent food banks express interest in expanding their number of TEFAP partners, but a majority indicate that a lack of available food prevents them from doing so. Additionally, in semi-structured interviews food banks overwhelmingly cited a need for entitlement funding as food insecurity rates continue to remain elevated. For example, the Capital Area Food Bank's 2022 Hunger Report found that one-third of people had experienced some level of food insecurity during 2021.⁹

EAGERNESS FOR (MORE) INPUT, COLLABORATION, AND STREAMLINING

Food banks with multi-state service areas and state agencies alike have benefited from collaborative opportunities to expand program impact, efficiency, and reach. Respondent food banks reflected on the practices that have enabled meaningful service and identified opportunities to build upon reciprocal administration of the program.

DISTRIBUTION FLEXIBILITIES ENABLED GREATER REACH

Overwhelmingly, respondent food banks participated in models of service (enabled through state adopted flexibilities and encouraged by FNS at the height of the pandemic) that made it easier to reach a number of populations struggling to access their next meal. The infographic on the bottom half of page nine highlights the populations more readily reached through flexibilities.

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“Product cancellations have greatly impacted our ability to serve.... Food Bank of the Rockies is currently **spending \$1.3M on average per month** to close the product gap on behalf of our partners.”

—FOOD BANK OF THE ROCKIES

“

“The state orders all products with limited recommendations from the food banks. Sometimes they have to place [orders] so far out it is hard to be reactive to what your clients want.”

—DARE TO CARE FOOD BANK

“

“The opportunity to create meaningful TEFAP reform at this time in the program's history cannot be ignored. Cohesiveness and efficiency in the administration of the TEFAP program will strengthen the ability of food banks to provide a less complex and more dignified experience for food insecure Americans across the country.”

—CHATTANOOGA AREA FOOD BANK

EAGERNESS FOR (MORE) INPUT, COLLABORATION, AND STREAMLINING (CONTINUED)

STREAMLINING IS INTEGRAL TO OPTIMIZATION

Administrative dissimilarities and restrictions that differ across states create program inefficiencies for TEFAP partners, food banks, and state agencies.

REPORTING AND SYSTEMS

The methods, timeframes, and means of reporting to state agencies vary drastically across the country. Nearly 90 percent of respondent food banks indicate that consistent reporting requirements across states, along with a centralized electronic reporting platform, would enhance efficiency.

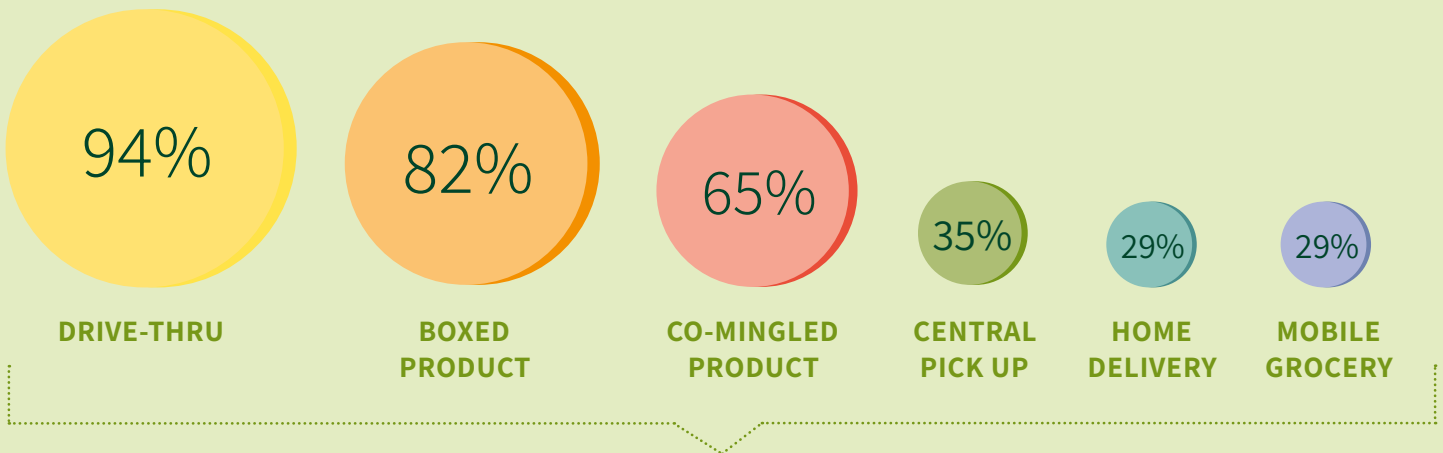
SITE REVIEWS

Based on state guidelines, site reviews of TEFAP partners are conducted by food banks and state agencies using various methods and frequencies, and with differing requisites of information collection. Seventy-five percent of respondent food banks indicate that it would be beneficial if all states offered the same frequency and type of TEFAP site reviews.

INABILITY TO SPLIT ORDERS BETWEEN STATES

Nearly one out of four respondent food banks say that difficulties involved in splitting orders across states is one of the largest barriers to distributing food in a timely, effective, and efficient manner. In semi-structured interviews, food banks noted that a lack of interstate coordination to share or split TEFAP loads limits product diversity, quantity, and availability for neighbors.

FOOD BANK PARTICIPATION IN FLEXIBILITIES ENABLED GREATER REACH



8 Populations More Readily Reached through Flexibilities

1. People with unreliable access to transit
2. People with disabilities
3. Older adults
4. Mixed status, undocumented people
5. People with limited English proficiency
6. College students
7. School children
8. Tribal members

INEFFICIENCIES IN THE INFORMATION SUPPLY CHAIN

As a federal program administered by the states and operationalized by food banks, TEFAP information, guidance, and technical expertise must flow through many communication channels. Findings suggest that kinks in the information supply chain have led to varying interpretations of fundamental aspects of the program, which is sub-optimal for operational efficiencies and neighbor experience.

CONFUSION EXISTS REGARDING STATES' 6-MONTH INVENTORY REQUIREMENT

A federal requirement does not permit states to have more than 6 months of TEFAP inventory by food category. Semi-structured interviews revealed that food banks—although the rule is only applicable to states—have differing interpretations of applicability, and survey data confirmed this variation. In semi-structured interviews, food banks express far-reaching implications of proper understanding for ordering, storage, and ongoing operations.

DIFFERING INTERPRETATIONS OF 6-MONTH INVENTORY REGULATION

Food banks must distribute all TEFAP product within 6 months of receipt

58.8%

Food banks cannot have more than 6-months worth of TEFAP inventory in the facility at any one point in time

29.4%

Food banks only must distribute food within 6 months if it is perishable within that timeframe

11.8%

“

“We adhere to TEFAP across three states, and we see, on the front lines, the variability in regulatory approaches. Every rule or regulation has far-reaching implications for how we serve, and how our clients experience or access the program.”

—CAPITAL AREA FOOD BANK

INEFFICIENCIES IN THE INFORMATION SUPPLY CHAIN (CONTINUED)

INTERSTATE COOPERATIVE AGREEMENT POTENTIAL IS UNTAPPED

Nearly 3 in 4 food bank respondents are not aware that current regulations allow food to be served across state lines with cooperative agreements—speaking to a critical portion of the program not being leveraged. This may explain why **nearly half of food bank respondents have not attempted to work with states to arrange this practice and why more than one-third are located in states that have explicitly stated this form of distribution is not legal or allowed.**

MISPERCEPTION THAT FLEXIBILITIES ARE TEMPORARY OR EMERGENCY ORIENTED

Aforementioned flexibilities in TEFAP distribution and client eligibility were widely permitted by states and leveraged by food banks over the course of the pandemic. FNS issued guidance in March of 2020 (and had done so prior during Trade Mitigation in November of 2019) clarifying the availability of flexibilities to ease the distribution of TEFAP products, and the ease of access for neighbors.¹⁰ While FNS deserves much credit for this clarification and for the ensuing utilization of TEFAP flexibilities by states, food banks and states often are not aware that these approaches to distribution and neighbor access have always been available. In fact, many states have decided to “end” the flexibilities implemented during COVID-19, even though the flexibilities are allowed to continue per federal TEFAP regulations.¹¹

“

“Efforts to support food insecure individuals shouldn’t be regulated by state lines or communities that are minutes apart in different states.”

—RIVER BEND FOOD BANK

75 percent of respondent food banks are not aware that TEFAP flexibilities exercised during the pandemic have always been available for programmatic administration.

RECOMMENDATIONS FOR ADMINISTRATIVE AND POLICY REFORM

EASE ACCESS AND IMPROVE EXPERIENCE FOR NEIGHBORS

Neighbor access (or attempted access) to TEFAP varies significantly across states; food banks overwhelmingly support a more accessible, streamlined program for neighbors. As a federal program, TEFAP has four key eligibility determination requirements in statute: name, number of people in household, address, and declaration of income. However, states have wide discretion in TEFAP regulations to impose additional requirements to determine eligibility, as well as income. The infographic below demonstrates respondent food bank support for neighbor access reforms with accompanying recommendations for federal policymakers.

FOOD BANK FAVORABILITY FOR FEDERAL ACTION ACTIONS REQUESTED OF FEDERAL POLICYMAKERS

	CONGRESS	USDA FNS
94% SUPPORT NEIGHBOR-DETERMINED DECLARATION OF “NEED”	Legislate to allow for self-declaration of need without income guidelines.	Revise federal regulation 7 CFR § 251.5 (b) (1)(2) to create a uniform, federal eligibility requirement of self-declaration of “need” without income guidelines. ¹²
88% SUPPORT ACCESS WITHOUT NEIGHBOR SIGNATURE	Legislate to disallow neighbor signature requirements.	Encourage states to utilize in lieu of signature flexibilities OR amend federal regulations to disallow neighbor signature requirements.
82% SUPPORT ACCESS WITHOUT STATE OR JURISDICTIONAL RESTRICTION	Legislate to allow for interstate access of TEFAP product.	Revise 7 CFR § 251.5 (b)(3) to also allow TEFAP foods to be distributed within the food bank’s (or recipient agency’s) geographic service area. ¹³
82% SUPPORT ACCESS WITHOUT FREQUENCY LIMITATIONS	Legislate to disallow restrictions on access frequency.	Encourage states to remove restrictions that limit the number of TEFAP visits or the amount of TEFAP foods provided.
77% SUPPORT REMOVING ID COLLECTION REQUIREMENT	Legislate to disallow identification collection as requisite for eligibility.	Encourage states to allow for distribution without ID requirement OR amend federal regulations to disallow collection of identification. ¹⁴
77% SUPPORT ACCESS WITHOUT ADDRESS COLLECTION	Legislate to remove address collection as requisite for access.	Revise 7 CFR § 251.10(a)(3) to disallow address collection OR require states to adopt alternative collection processes for state (or other) residence determination. ¹⁵
65% SUPPORT MINIMUM INCOME ELIGIBILITY OF 185 PERCENT OF FEDERAL POVERTY GUIDELINE	Legislate to establish 185 percent or greater of federal poverty guideline as minimum income threshold for eligibility.	Revise federal regulation 7 CFR § 251.5 (b) (1)(2) to establish 185 percent or greater of federal poverty guideline as minimum income threshold for eligibility.

EQUIP FOOD BANKS WITH FOOD, FUNDING, AND FLEXIBILITY

A range of variables dictate the ability, capacity, and agility of food banks to serve TEFAP—many before the food is even acquired or delivered. Policymakers should implement and invest in this aspect of the program to allow food banks greater leverage to serve.

FINDINGS **COSTS TO ADMINISTER ARE GREATER THAN FUNDING PROVIDES**
Policymakers can take steps to ensure food banks are able to administer the program in a cost-effective manner.

POLICY RECOMMENDATIONS

CONGRESS

Increase authorization for TEFAP administrative grants in the Farm Bill and annual appropriations to reflect the true cost of expenses for the program.¹⁶

Amend Section 27(a) of the Food and Nutrition Act of 2008 to authorize mandatory funding for administrative grants and index administrative funding to annual increases in the Thrifty Food Plan (TFP).¹⁷

Create a mechanism to provide supplementary administrative funding to accompany commodity bonus purchases.⁸

Annually appropriate \$15 million for TEFAP infrastructure grants.^{19,20}

FNS

Implement processes to incentivize states to employ administrative reimbursement schedules that align with the cost schedules of food banks.

Nearly **6 in 10 food banks** indicate that requiring states to create administrative reimbursement schedules that align with the cost schedules of food banks is one of the most impactful actions the federal government can take to improve TEFAP.

FINDINGS **CANCELLATIONS, LOW LEVELS OF FUNDING AND INPUT PROHIBIT EFFICIENT AND EFFECTIVE ADMINISTRATION**
Policymakers have a real opportunity to improve the experience food banks have in TEFAP product acquisition, from the point-of-funding notification to ordering to receipt.

POLICY RECOMMENDATIONS

CONGRESS

Double the amount of annual, baseline entitlement funding to \$500 million, and index to inflation.²¹

Require states to provide food banks with at least six months' notice of the amount of available entitlement funding.

“

If we know our entitlement budget well in advance, we can strategically plan out our TEFAP orders, account for non-TEFAP food we need to purchase or process and equip our agency partners for their distribution planning. It all comes full circle, and there should be a requirement for states to notify us on a timelier and more consistent basis.”

—CAPITAL AREA FOOD BANK

FNS

Increase the turnaround time for purchasing and delivery.

Reduce the number of cancellations.

Provide food banks with greater autonomy over the type and quantity of products available.

100 percent of respondent food banks support a federal policy that requires states and the federal government to provide food banks at least 6 months' notice of the amount of entitlement funding.

EMPOWER FOOD BANKS TO SERVE THROUGH PARTNERSHIP AND PROCESS

Together, state agencies and food banks can strengthen TEFAP and alleviate hunger. Federal actors should require and incentivize further collaboration between the governmental agencies who oversee administration and the food banks who take on the lion's share of operationalization.

FINDINGS

DISTRIBUTION FLEXIBILITIES ENABLED GREATER REACH

Numerous respondent food banks have indicated hope, yet uncertainty about their states' plans to allow flexible distribution models permanently.

POLICY RECOMMENDATIONS

CONGRESS

Require states to allow food banks to choose flexible distribution models as they deem necessary and fit for service to neighbors.

FNS

Encourage state agencies to adopt flexible distribution models permanently and to communicate permanent TEFAP changes to food banks clearly.



“If we were only allowed to use TEFAP through our brick-and-mortar pantries in rural communities, where there's only one pantry, that means there's greater limitation for neighbors to access food.”

—ST. LOUIS AREA FOOD BANK

FINDINGS

STREAMLINING ADMINISTRATION IS INTEGRAL TO OPTIMIZATION

Multi-state food banks uniquely showcase the need for federal action to enable efficiencies, and instill and incentivize collaboration.

POLICY RECOMMENDATIONS

CONGRESS

Require state agencies to resubmit annual state distribution plans with requisite input from food banks.²² Requirements should include:

- An annual resubmission of the state distribution plan—allowing for a 30-day period of review and comment submission by eligible recipient agencies, followed by an additional 30-day amendment drafting and submission period by state agencies—to ensure the plan aligns with fluctuating program needs.²³
- A 30-day period of review and comment submission by eligible recipient agencies ahead of any state distribution plan amendment initiated by the state agency.²⁴

FNS

Incentivize state agencies to enter into cooperative agreements that allow food to be served across state lines, particularly when those states sit within a multi-state food bank's service area.

Encourage state agencies across the country to standardize the frequency, type, and content of site reviews and reporting metrics, taking into consideration respondent food bank preference toward a centralized, electronic platform.

94 percent of respondent food banks support more federal involvement to encourage or incentivize states to enter into cooperative agreements.

FORTIFY THE INFORMATION SUPPLY CHAIN

TEFAP is an inherently complex program that requires a clear and ongoing supply of accurate and digestible information. There are several examples demonstrating that the information being provided to states, being given to food banks, or interpreted by respondent food banks is not aligned with federal regulations or legislative intent.

FINDINGS

FLOW AND ACCURACY OF INFORMATION COULD BE STRENGTHENED

Policymakers are positioned to employ regulatory or legislative methods to empower food banks to operate with the most accurate information possible.

POLICY RECOMMENDATIONS

CONGRESS

Request a study by the Government Accountability Office to identify categories and themes of incorrect information being provided to food banks.

FNS

Issue guidance clarification for food banks regarding states' six-month requirement, interstate service, and distribution flexibilities.

Conduct a regional study, by USDA region, to assess information dissymmetry along the information supply chain.

CONCLUSION

Feeding America food banks are the backbone of US hunger relief infrastructure, leading the distribution of TEFAP food for decades; the respondents in this study provide TEFAP service across over half the country's states.

The program has become a fundamental part of the social safety net, and this brief provides a roadmap for policymakers to entrust and empower food banks to leverage distribution channels, partner agency networks, and community ties in order to enhance reach, impact, and equity.

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“Legislators provide the engine for the TEFAP program, while food banks drive that car on a daily basis. We’ve done a lot of laps and have some feedback you might be interested in.”

—RIVER BEND FOOD BANK

“With federal standards that minimize barriers to accessing The Emergency Food Assistance Program, we can make real progress on the long road to ending hunger in America. Reforms to TEFAP are long overdue and this is an important step to ensure people experiencing hunger are at the center of program decisions.”

—OREGON FOOD BANK

“Our partnership with the USDA and our participation in TEFAP are key to us succeeding in our vision of a nutritionally secure Illinois and Missouri. We ask our legislators to join us in our mission of nourishing our neighbors by increasing TEFAP’s efficiency and effectiveness in the upcoming Farm Bill.”

—ST. LOUIS AREA FOOD BANK

“Bringing greater consistency to TEFAP requirements—and aligning them with the difficult challenges facing thousands of our neighbors in need—will foster healthier, thriving communities while greatly enhancing our ability to serve them.”

—FOOD BANK FOR THE HEARTLAND

“Our hope is that policymakers seize this monumental opportunity, on the cusp of the 40th anniversary of the program and the Farm Bill, to enhance TEFAP and glean from this snapshot of food banks that serve a large swath of the United States.”

—CAPITAL AREA FOOD BANK

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APPENDICES

A: FEEDING AMERICA METHODOLOGY, ANALYSIS OF FOOD BANK TEFAP AND CSFP DISTRIBUTION COSTS

This appendix is an excerpt of the Feeding America methodology used to aid food banks in calculating the costs of distribution of TEFAP. Respondent food banks were provided this methodology as a guide in calculating the out-of-pocket costs per pound of TEFAP administration.

ANALYTICAL APPROACH

1. CALCULATING POUNDS DISTRIBUTED

For our first step, we calculate the total poundage distributed by each food bank's fiscal year to align with the food bank's financial data by fiscal year, as well as the total amount of TEFAP and CSFP commodities distributed by each food bank's fiscal year to align with the food bank's financial data by fiscal year. We also calculate the percent of all food represented by TEFAP and CSFP for each food bank's fiscal year.

2. CALCULATING EXPENSES

We calculate and adjust food bank Operating Expenses by their fiscal year to only include those line items which would accrue to Food Distribution (specifically including Wages and Benefits, Product Purchasing, Occupancy, Transportation, Programs, Social Enterprise, and Other). We omit expenses for Fundraising, Direct Response, Depreciation, Professional Services, and Technology. We next estimate the amount of expenses which can be attributed to TEFAP and CSFP distribution by applying, for each individual fiscal year, the percentage of all products distributed which are represented by TEFAP and CSFP. We multiply this percentage by the total adjusted Food Distribution expenses to derive the amount for distribution of TEFAP and CSFP.

3. CALCULATING REIMBURSEMENTS FROM USDA

We pull from the Network Activity Report the amount of revenue each food bank received in their fiscal year for TEFAP Administration and CSFP Administration.

4. CALCULATING PERCENTAGE REIMBURSEMENT

Finally, we compare the amount of reimbursements with the adjusted expenses estimated for distribution of TEFAP and CSFP pounds only.

COMMENTS

An overall calculation of "Cost Per Pound to Distribute" is a metric included on the Performance Benchmarking Dashboard that was proposed by a committee that included 13 Feeding America food bankers. The "Cost Per Pound to Distribute" methodology is not as conservative as the methodology included in this document because that methodology included all operating expenses. This makes the TEFAP/CSFP approach is much more conservative than the methodology food bankers approved for the Performance Benchmarking Dashboard.

This approach is also conservative because a great deal of the pickups and distribution from retailers is now being done by agencies of the food bank and absolutely no cost data is being collected from them for this activity. This means that the operating expense data we do have underreports distribution costs to a large extent.

B: FOOD BANK PARTICIPANTS

Capital Area Food Bank	Food Bank of Northern Nevada	River Bend Food Bank
Chattanooga Area Food Bank	Food Bank of the Rockies	Second Harvest Food Bank of Metrolina
Dare to Care Food Bank	Freestore Food Bank	Second Harvest Heartland
Facing Hunger Food Bank	Great Plains Food Bank	Second Harvest Inland Northwest
Feeding the Gulf Coast	Harvesters—The Community Food Network	St. Louis Area Food Bank
Feeding the Valley Food Bank	Oregon Food Bank	Tri-State Food Bank
Food Bank for the Heartland	Philabundance	

C: ATTRIBUTIONS

This policy brief and comprehensive analysis were made possible by several stakeholders and experts in the TEFAP space and food banking community. We thank Feeding America for their expertise and input throughout this project—notably, in survey formation and consultation on the policy recommendations. We are grateful to FNS at USDA, and leadership at USDA’s Mid-Atlantic Regional Office for providing technical expertise as each phase of this project was crafted. Our team was grateful to present at the American Commodity Distribution Association Annual Conference on April 27, 2022, to gather feedback ahead of survey administration. We thank Eighty2degrees for designing this document. Finally, we are grateful for the participation and dedication of each multi-state food bank—including the cross-departmental Capital Area Food Bank team—who are all passionate advocates for strengthening and administering TEFAP to best serve our neighbors.

ENDNOTES

[1] Further detail on methodology is available upon request.

[2] This definition was crafted from the [2022 Congressional Research Service](#) (CRS) report on FNS Administrative flexibilities offered during the pandemic.

[3] This range reflects income guidelines across respondent food banks' states as of August 1, 2022.

[4] TEFAP income guidelines are set as a percentage of the federal poverty guideline.

[5] The methodology provided to food banks for calculation of out-of-pocket costs to administer TEFAP is based on the "Methodology for the Analysis of Food Bank TEFAP and CSFP Distribution Costs," as provided by Feeding America in consultation of this request and survey question. To view this methodology, see Appendix B.

[6] Table 1 was created based on data provided on page 20 of the [Congressional Research Service's 2022 TEFAP report](#).

[7] To estimate the number of meals, CAFB took the average number of meals (19) in each TEFAP case received in FFY2022 and multiplied that by the aggregate number of cancelled cases reported by respondent food banks.

[8] Despite understanding that recent supply chain difficulties have caused an unprecedented number of cancellations, respondent food banks overwhelmingly indicated cancellations were a seminal barrier in their ability to serve TEFAP.

[9] The Capital Area Food Bank's 2022 Hunger Report is [here](#).

[10] See the [November 2019](#) and [March 2020](#) FNS memos.

[11] Examples include [Ohio](#) and [Pennsylvania](#).

[12] [7 CFR § 251.5 \(b\)\(1\)\(2\)](#) indicates neighbor eligibility for TEFAP must be established with the inclusion of "income-based standards" to determine "need of food assistance because of inadequate household income."

[13] [7 CFR § 251.5 \(b\)\(3\)](#) requires "that the household reside in the geographic location served by the state agency at the time of applying for assistance." This language hinders multi-state food banks from serving throughout their own service areas (barring cooperative agreements).

[14] While verification of identity (and/or collection of identification to verify address) are not required under federal regulation, many state agencies adopt this prohibitive restriction.

[15] [7 CFR § 251.10\(a\)\(3\)](#) notes, "Each distribution site must collect and maintain on record for each household receiving TEFAP commodities for home consumption... the address of the household (to the extent practicable)..."

[16] TEFAP administrative funds are currently authorized at \$100 million under [Section 204 of the Emergency Food Assistance Act of 1983](#). However, this amount has never been fully appropriated by Congress through an annual appropriations act (exclusive of a transfer of \$30 million Commodity Supplemental Food Program prior-year funds in [FY2019](#)).

[17] Based on USDA's re-evaluation of the Thrifty Food Plan (TFP) in June 2022, [TEFAP entitlement funding increased](#) by roughly 21 percent. However, law does not permit this increase in entitlement funding to apply to administrative funding.

[18] USDA Bonus commodities are purchased based on product surpluses; thus, fluctuate significantly from year-to-year.

[19] Extended through the 2018 Farm Bill, Congress is authorized to appropriate up to \$15 million for TEFAP infrastructure grants annually. Funds, however, have not been appropriated for [infrastructure grants](#) since FFY2010.

[20] In June 2022, FNS awarded nearly \$40 million in [TEFAP Reach and Resiliency grants](#). These grants represent a one-time investment for what should be an annual priority through infrastructure grants.

[21] This request mirrors Feeding America's Farm Bill 2023 priorities.

[22] In the [2018 Farm Bill](#), legislators required state agencies to assemble a plan to offer emergency feeding organizations input on commodity preferences and needs within their State Plan ([7 CFR 251.6\(a\)\(6\)](#)). However, such organizations may receive limited input into other aspects of TEFAP they must operationalize daily, which are dictated by the state distribution plan.

[23] An annual timeframe aligns with state plan submission and amendment requirements in other USDA nutrition programs, including [SNAP E&T](#), [WIC](#), and [SFSP](#).

[24] Under disaster or emergency declarations, this period shall be voided.

