

CSFP

CASELOAD ALLOCATION PROCESS



Dana Rasmussen
January 26, 2010



What is caseload?

Caseload is the number of people the State agency may serve on an average monthly basis from January 1 through December 31.



How does USDA determine total caseload each year?

To determine caseload supported, USDA Food and Nutrition Service (FNS):

- Looks at the amount of resources available, including funding from Congress; and
- Considers projected food and administrative costs for the year, which are impacted by inflation.

Caseload Allocation Process Overview



1. **Base caseload** determined for currently participating States (assumes sufficient resources).



2. If resources remaining, **additional caseload requests** of currently participating States considered.



3. If resources still remaining, **new State caseload requests** considered.



4. **Final caseload** assigned.



Base Caseload

Prior to submitting requests for additional caseload, States should calculate their base caseload. **Full Fiscal Year (FY) participation data is needed.**

- a. In many cases, base caseload does not equal total caseload for the previous caseload cycle—oftentimes less.
- b. Base caseload *cannot* exceed total caseload for the previous caseload cycle, per § 247.21(a)(1).



How is base caseload determined?

Assuming sufficient resources:

- **States entering 2nd year of program participation get base caseload equivalent to 1st year total caseload.**

- Base caseload for currently participating States with 2+ years in the program—equal to the highest of:
 - (a) Average monthly participation for the prior fiscal year (FY) (Oct. – Sept.); or
 - (b) Average monthly participation for the 4th quarter (Jul.-Sept.) of the prior FY; or
 - (c) In certain *limited* circumstances, participation for the month of September only of the prior FY.



Base Caseload:

When can September be used?

For a State that has participated in 2+ caseload cycles, September participation may be used as a standalone measure for determining base caseload if:

1. Full-year appropriation for the previous FY enacted on or after Feb. 15; **and**
2. In previous caseload cycle, State agency received additional caseload equal to or greater than 10 percent of base caseload; **and**
3. October participation in current FY equal to or greater than 95 percent of September participation in previous FY.

See § 247.21(a)(1).



Eligibility for Additional Caseload

A CSFP State qualifies to receive additional caseload if it achieved a participation level equal to or greater than **95 percent** of assigned caseload, based on the highest of:

- (a) Average monthly participation for the previous FY (Oct.-Sept.); or
- (b) Average monthly participation for the 4th quarter of the previous FY (Jul.-Sept.); or
- (c) In certain *limited* circumstances, participation for the month of September only of the previous FY.

See § 247.21(a)(2).



Eligibility for Additional Caseload - Use of September

For a State that has participated in 2 or more caseload cycles, the **same standards** that apply to use of Sept. participation data as an independent measure to determine base caseload also apply to that data's use when determining eligibility for additional caseload. See § 247.21(a)(2).



Eligibility for Additional Caseload - Use of September

States entering their 2nd caseload cycle must meet the same standards, **with the exception of the 10 percent minimum increase standard.**

States entering 2nd year do not receive additional caseload in their first caseload cycle. These States cannot be expected to meet the 10 percent standard.



Base Caseload & Eligibility for Additional Caseload in 2011

For the 2011 caseload cycle, month of September participation data will **not** be available for use as an independent consideration for determining base caseload and eligibility for additional caseload.

Why?

The full-year appropriation for the previous FY (FY 2010) was enacted in October, well before February 15.

Example: Base Caseload & Eligibility for Additional Caseload in 2011

State Z has a caseload of **100** for the 2010 caseload cycle (Jan. 1 to Dec. 31, 2010), and will be entering its 5th year of program participation in 2011.

1. The State's average participation for FY 2010, Oct. 2009 through Sept. 2010, is **94**.
2. The State's average participation over the final quarter of the FY, July 2010 through Sept. 2010, is **99**.

Question:

Assuming sufficient resources, what is State Z's base caseload for 2011?

Example: Base Caseload & Eligibility for Additional Caseload in 2011

Answer: State Z's base caseload is 99.

This is because final quarter FY 2010 average participation at 99 is higher than the full FY 2010 average participation at 94, and equal to or less than prior year assigned caseload (**100**).

In other words, the “High Two” base caseload calculation is 99.

Question: If this State were entering its second year in the program, what would its base caseload be?

Example: Base Caseload & Eligibility for Additional Caseload in 2011

Answer: If State Z were entering its 2nd year of operations, then, assuming sufficient resources, it would receive at minimum the same caseload that it had in 2010 - 100 slots.

In other words, 100 is its base caseload number for 2011.

Example: Base Caseload & Eligibility for Additional Caseload in 2011

For all States, including States going into their 2nd year, eligibility for additional caseload is based on actual “High Two” participation in the prior FY. For this example:

99 “High Two” Participation

-divided by-

100 Assigned Caseload Slots

-equals-

99.00 Percent Usage Rate

Question: Is the State eligible for additional caseload?

Example: Base Caseload & Eligibility for Additional Caseload in 2011

Answer: Yes.

Because State Z's "High Two" participation level of 99 is equal to or over 95 percent of assigned caseload (100) in the previous year, State Z is eligible to receive additional caseload.



Additional Caseload Requests

- All requests for additional caseload from eligible States must be submitted to the Regional Office (RO) by **November 5** each year.
- Each State's additional caseload request is over and above its calculated base caseload, *not* previous year's total caseload. (Remember: Base caseload calculation will never exceed prior year's total caseload assignment).
- If requesting additional caseload, a State should request an amount that it can effectively use.



Caseload Checklist

- ❑ **Monthly:** State agency to ensure timely & accurate submission of FNS-153 participation data to FNS. Due 30 days after the reporting period. Financial data due quarterly. Address reporting issues early in FY. See § 247.29.

- ❑ **Monthly:** Monitor participation against assigned caseload & advise local agencies as needed.

- ❑ **August 15:** New State Plans due to RO, including new State caseload requests. Once approved, State Plan considered permanent, with amendments submitted as needed or at FNS request—see § 247.6(a).



Caseload Checklist

- ❑ **Early October:** As a courtesy to FNS and to the extent possible, please submit final FNS-153 participation data for previous FY (ending Sept. 30). Check to ensure accuracy prior to submittal.
- ❑ **November 5:** Additional caseload requests, including any justifications, due to RO. See 247.6(d).

CSFP

CASELOAD MANAGEMENT & WAITING LISTS



Dana Rasmussen

January 26, 2010



Why is caseload management important?

- CSFP is a discretionary program with limited resources.
- Because resources are limited, permitting participation on an average monthly basis which is over assigned caseload is prohibited.
- Conversely, using less caseload than what is assigned means that food resources could be going unused when individuals are in need of assistance.



Active Monitoring of Participation & Caseload Use

- State agency staff must actively monitor program participation rates and overall caseload use each month.
- The FNS-153, Monthly Report of the Commodity Supplemental Food Program and Quarterly Financial Status Report, is due to FNS each month. The data provided on this report will help you monitor participation and caseload use.
- Many current States use computer software to monitor and manage caseload use, such as Microsoft Excel. Trends can then be identified and addressed.



Communication

- Critical between the State and local agencies, and the local agencies and applicants/participants

- Local agency to inform the new participant of the time, location, and means of food distribution, as well as the length of the certification period. See 7 CFR 247.15.

- Ideas for local agency communication:
 - Provide printed calendars showing the distribution times, dates, locations
 - Time permitting, telephone participants before distributions/after if no pickup
 - Distribute earlier in the month to allow for alternate arrangements



Proxies

- **State agencies may permit the use of proxies.**

- A proxy is any person designated by the participant, or the adult parent or caretaker of the participant, to obtain CSFP foods on behalf of the participant.

- State agencies must require local agencies to (See FD-099):
 - Obtain proxy designations in writing, including the period of time for the proxy designation;
 - Maintain files of all written proxy designations;
 - Review proxy identification prior to each certification, recert, and food package distribution; and
 - Meet all other requirements in 7 CFR Part 247.



No-Show Policies

- States may institute no-show policies, or permit their local agencies to do so.
- In some States, after a participant misses two or three consecutive distributions, that individual is discontinued from the program with at least 15 days' written notice prior to the effective date. See 7 CFR 247.17.
- No-show policies enable local agencies to better serve individuals on the waiting list.



Certification Periods

- Maximum cert periods are generally 6 months with some exceptions based on age, pregnant/postpartum, etc. See 7 CFR 247.16.

- To fully use caseload, State agencies may permit issuance of temporary benefits to individuals on waiting lists, if regular participants are no-shows and reasonable effort has been made to contact them.
 - Minimum certification period is one month per 7 CFR 247.10 and applicable guide rates.
 - Notification of placement back on the waiting list required at the time of issuance.



Referrals

- The Food, Conservation, and Energy Act of 2008 (also known as the Farm Bill) eliminated the statutory preference in CSFP for women, infants, and children.
- No requirement to serve women, infants, or children over seniors.
- In areas where both CSFP and WIC operate, local agencies should refer eligible women, infants, and children to WIC given the greater access the health care and nutrition education.



Waiting Lists – Priority System Required?

- No requirement to prioritize waiting lists in any particular order.
- However, local agencies must meet civil rights requirement at 7 CFR 247.37, ensuring that no person is subject to discrimination on the grounds of that person's race, color, national origin, age, sex, or disability.
- **Local agencies may certify individuals from the waiting list based on the date the application was received on a first-come, first-served basis.**



Caseload Adjustments

- State agencies are permitted to adjust local agencies' caseload and administrative funding allocations, based on past performance.
- Adjustments may be performed annually or at another frequency, provided the State communicates its performance expectations up front.
- State must ensure that participants currently being served are not discontinued from CSFP due to performance adjustments.



Questions? Comments?



For further information, go to

<http://www.fns.usda.gov/fdd/programs/csfp/>.