

Vermont State Plan of Operations

**Senior Farmers Market Nutrition Program
Fiscal Year 2007**

Administered by:

**Vermont Department of Disabilities,
Aging, and Independent Living (DAIL)
103 South Main Street
Waterbury, VT 05671-2301**

Vermont Senior FMNP Plan of Operations for Program Year 2007

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SENIOR FARMERS MARKET NUTRITION PROGRAM
State Plan of Operations for Vermont
Fiscal Year 2007

The Senior Farmers Market Nutrition Program (SFMNP) administering State agency for Vermont is the Agency of Human Services' Department of Disabilities, Aging and Independent Living (DAIL). **Vermont's SFMNP will have distinct farmers market and community supported agriculture (CSA) farm share program tracks. Where state plan data is specific to just one of those tracks, the narrative or worksheets will identify the data as applicable to either the "Market Component" or "CSA Component", respectively.** In partnership with DAIL, the Economic Services Division of the Department for Children and Families (ESD) will manage the farmers market coupon component. In a similar partnership with DAIL, the Northeast Organic Farming Association of Vermont (NOFA-VT-VT) will manage the CSA farm share component, which is also known in Vermont as the Senior Farm Share Program.

I. GOALS

1. STRATEGIES TO ACHIEVE PROGRAM OBJECTIVES

The State agency plans to achieve the three purposes of the SFMNP as follows:

(1) to provide resources in the form of fresh, nutritious, unprepared, locally grown fruits, vegetables, and herbs from farmers markets, roadside stands, and CSA programs to low-income seniors.

The SFMNP will enable eligible low income elderly participants to receive fresh, locally grown produce from Vermont farmers markets and community supported agriculture (CSA) farms.

(2) to increase the domestic consumption of agricultural commodities by expanding or aiding in the expansion of domestic farmers' markets, roadside stands, and CSA programs.

SFMNP benefits will be provided to seniors whose customs and income levels may severely limit their consumption of locally grown foods. Low income seniors often choose lower cost foods that are available at supermarkets but may be heavily processed and less nutritious. Participants will learn about the selection and use of fresh produce, seasonal fluctuations in the availability of certain types of produce, and how to shop effectively at farmers markets.

(3) to develop or aid in the development of new and additional farmers' markets, roadside stands, and CSA programs.

By providing resources that enable low income seniors to buy fresh produce at farmers markets and from CSA farms, the SFMNP expands the customer base for these agricultural outlets and increases income for small scale produce growers. Restricting redemption of farmers market coupons to those sites encourages producers to join or create farmers markets. The number of farmers markets has grown tenfold since Vermont began distributing market coupons in 1987.

A key player in Vermont's SFMNP is the Northeast Organic Farming Association of Vermont (NOFA-VT), which provides coordination and technical assistance to farmers markets, CSAs and other producers statewide. New CSAs have started as a result of participating in the SFMNP, and other CSAs have significantly strengthened due to an increase in the number of shares and the diversification of the membership base.

2. PROGRAM FEATURES AND IMPACT INDICATORS

Market Component:

Vermont began its "Farm To Family" farmers market coupon program two years before federal FMNP funds became available. Since 1987, Community Action Agencies (CAAs) have been issuing Farm To Family coupons to low income households in conjunction with other services, such as help with home weatherization, budgeting or Food Stamp applications. This statewide program operated by ESD – Vermont's WIC FMNP state agency – supplied the operational infrastructure for Vermont to provide coupons to more seniors using federal SFMNP funds. The Farm To Family database system is used to compare coupon redemption rates among local agencies and determine how coupons flow from local offices to specific farmers markets. This data is helpful in allocating coupons around the state and in staff and market training. The coupons clearly support SFMNP goals. Fourteen percent of the senior participants surveyed in 2006 said they had never gone to a farmers market before taking part in the program, and 63% returned to shop at the markets after they ran out of coupons. Nearly half (48%) said they learned new ways to prepare fruits or vegetables, 56% learned new ways to store fresh produce, and 41% bought a type of produce they had never tried before. Four out of five said that they plan to eat more fresh produce year-round as a result of taking part in the coupon program.

CSA Component:

Focusing on residents of senior housing sites enabled Vermont to deliver CSA food benefits to SFMNP-eligible older adults in a manageable way.

Identifying the significant impacts of the Senior Farm Share program on the older adults and adults with disabilities who receive farm shares has been a goal of the program since its inception. Towards this end, pre and post surveys were completed by over one-third (n=242) of Senior Farm Share program participants in 2006. Improvements in food security and diet quality were evident in responses. Specifically:

- Fewer participants in the follow-up survey indicated that they had to cut the size of their meals or skip meals because there wasn't enough money for food (statistically significant, $p=.03$) indicating a greater level of food security.
- Eighty-four percent of respondents indicated that the produce they got through the Senior Farm Share program was always or almost always fresher than the produce they typically got. Fresher produce is likely to have more nutrients than less fresh produce.
- Sixty-two percent of respondents said they had more produce variety when they were participating in the program. Because nutrient content varies across produce, this likely translates into improved nutrient intake.
- Fifty-one percent of participants said they bought more fruit and 37% said they bought more vegetables during program participation because their food budget was not as tight when they were getting the CSA share.
- Forty-six percent of participants said they froze produce to use later, allowing them to reap some nutritional benefits after the program ended.

II. GENERAL ADMINISTRATION

1. *NUMBER OF SFMNP PARTICIPANTS IN FY 2006:* 1,472
2. *ESTIMATED NUMBER OF SFMNP PARTICIPANTS IN FY 2007:* 2,112
3. *PROPOSED MONTHS OF PROGRAM OPERATION:* January through December
4. *PROPOSED MONTHS OF SFMNP BENEFIT ISSUANCE:*
Market Component: Late June through September
CSA Component: May and June
- 5.. *PROPOSED MONTHS OF SFMNP COUPON REDEMPTION:*
Market Component: July through October
CSA Component: July through September
6. *STAFFING:*

Vermont has no public or private agency staff positions specifically or exclusively dedicated to the SFMNP. Most state-level administrative duties will be performed by the Aging and Disabilities Senior Planner at DAIL, and for the farmers market component, by the Food and Nutrition Program Coordinator and an Administrative Assistant at ESD. The DAIL and ESD positions will be entirely supported with non-SFMNP funds. Most duties for the CSA program component will be performed by the Executive Director at NOFA-VT, who is also the Senior Farm Share Coordinator, through an agreement with DAIL. Another key partner in the CSA program component is the University of Vermont (UVM) Extension; their work relating to the provision of nutrition education and completion of a program evaluation. The SFMNP duties for these five positions are outlined as follows:

DAIL Aging and Disabilities Senior Planner

- Manages all aspects of Vermont's SFMNP and coordinates with other state and local agencies.
- Assures compliance with state or federal obligations, financial and program reporting requirements.
- Manages contract with NOFA-VT and assures ESD compliance with DAIL/ESD memo of understanding.
- Chairs and periodically convenes an SFMNP advisory committee meeting (committee includes ESD, NOFA-VT and UVM Extension) to assure coordinated and responsive program planning, development and evaluation.
- Prepares SFMNP state plan of operations.
- Oversees policy and procedure development, implementation and evaluation.
- Facilitates distribution of CSA program information and evaluation materials to senior housing sites.

ESD Food & Nutrition Program Coordinator (Market Component Only):

- Designs and manages entire coupon program and coordinates with other state and local agencies.
- Communicates with FNS and SFMNP administrators in other states and regions.

- Assures compliance with state or federal obligations, financial and program reporting requirements.
- Designs and oversees production of forms and other program materials.
- Financial planning, accountability and reporting for the program component.
- Develops policy and procedures, and completes implementation and evaluation of them.
- Authorizes and monitors participating markets and farmers.
- Responds to any program-related complaints or concerns.
- Develops and conducts training for distributing agencies, farmers markets and participating vendors.
- Designs and manages FMNP database.
- Communicates with market managers regarding coupon management issues.
- Collects, analyzes and reports data to DAIL regarding participation, redemption and evaluation.
- Participates in SFMNP advisory committee, chaired by DAIL.

ESD Administrative Assistant (Market Component only):

- Performs the following tasks with oversight by the ESD program coordinator:
- Verifies that the coupons submitted for payment were accepted by authorized farmers.
- Completes coupon tally verification and data entry, and authorization of payments to markets.
- Responds to questions from market managers regarding coupon redemption payments.
- Reports any program-related questions/problems to the program coordinator.

NOFA-VT Senior Farm Share Coordinator /Executive Director (CSA Component Only):

- Authorizes CSA farms to participate in the program, determines the number of shares assigned to each farm and provides related farmer training.
- Works with DAIL to select eligible senior housing sites to participate in the program, determines the number of shares assigned to each site, and provides training to senior housing site coordinators.
- Designs program materials and distributes to all program participants (farmers, senior housing site coordinators and SFMNP participants (“senior farm share members”).
- Coordinates program information sessions at participating senior housing sites for resident housing site coordinator, partner farmer(s) and SFMNP participants.
- Responds to any program-related complaints or concerns.
- Assures timely payment of participating CSAs.
- Monitors participating CSA farmers for compliance with program policies and procedures.
- Maintains record keeping system for documentation of costs, participation and related data.
- Provides financial and program data to DAIL.
- Evaluates the program annually.
- Provides technical assistance to CSAs statewide and helps develop CSAs in underserved areas.
- Participates in SFMNP advisory committee, chaired by DAIL.

UVM Extension Nutrition Specialist

- Participates in SFMNP steering committee, chaired by DAIL.
- Conducts outcome evaluation to identify program impact on CSA recipients.
- Organizes and conducts nutrition education, including development of written materials as necessary.

Paid through Federal SFMNP Administrative funds

<u>Position</u>	<u>Full Time</u>	<u>Part Time</u>
NOFA-VT Executive Director		<u>X</u>
UVM Extension Nutrition Specialist		<u>X</u>

Paid through Non-Federal SFMNP funds/sources (specify)

<u>ESD Food & Nutrition Coordinator</u> _____	<u>X</u>
<u>ESD Administrative Assistant</u> _____	<u>X</u>

7. ALLOCATION OF FUNCTIONS TO THE SFMNP AND OTHER STATE AGENCIES

Indicate in the space provided the **State agency** that will be responsible for performing each function listed below:

<u>DAIL</u>	Lead State agency
<u>DAIL, ESD</u>	Certify recipients for the SFMNP
<u>DAIL, ESD</u>	Authorize and train local agencies
<u>DAIL, ESD</u>	Issue SFMNP coupons to participants
<u>DAIL, ESD</u>	Issue SFMNP coupons to local agencies
<u>DAIL</u>	Negotiate contracts with CSA farmers
<u>DAIL, ESD</u>	Provide nutrition education for the SFMNP
<u>DAIL, ESD</u>	Reconcile SFMNP coupons
<u>DAIL, ESD</u>	Conduct SFMNP reviews of local agencies
<u>DAIL, ESD</u>	Authorize farmers/farmers markets/roadside stands/CSA programs
<u>DAIL, ESD</u>	Train farmers/farmers markets/roadside stands/CSA programs
<u>DAIL, ESD</u>	Monitor farmers/farmers markets/roadside stands/CSA programs

After the State Plan is approved and federal funding level is determined, DAIL will develop an interagency agreement with ESD that specifies ESD and DAIL responsibilities for administration of the SFMNP farmers market component. That agreement will oblige ESD to meet certain program and financial reporting requirements, and will state the schedule, dollar amount and allowable costs for any federal SFMNP funds that DAIL may transfer to ESD for program implementation. A copy of the agreement between DAIL and ESD will be made available to the regional USDA Food and Nutrition Services (FNS) office after that agreement is prepared. DAIL's FY 2006 agreement with ESD is attached as a reference (*Appendix II-7a*).

8. *OTHER COOPERATING AGENCIES*

Will any other State or local government agencies, non-profit or for-profit organizations, or the extension service provide services for the SFMNP State agency? Yes No

Market Component:

Under ESD oversight, Vermont's five Community Action Agencies (CAAs) will distribute the SFMNP farmers market coupons. ESD will provide the program training and supplies to the CAAs, each of which sign a Coupon Acceptance Agreement with ESD that is described as part of the coupon management details in section V-1 of this plan.

CSA Component:

NOFA-VT will contract with DAIL to manage the CSA component of the program. Established in 1971, NOFA-VT is a non-profit association that works to develop and enhance direct markets (farmers markets, CSAs, farm stands) statewide by providing technical assistance, promotion and educational workshops. A copy of the FY 2006 DAIL/NOFA-VT grant agreement is attached (*Appendix II-8a*) to illustrate the general content and structure of this agreement. DAIL will provide the regional FNS office a copy of the FY 2007 grant agreement with NOFA-VT-VT after that document is prepared.

Senior housing site coordinators will be essential partners in the delivery of CSA share benefits to eligible participants. An attached form letter (*Appendix II-8b*) addressed to these senior housing site coordinators (also known as resident services coordinators) describes their role in the Senior Farm Share program.

The University of Vermont Extension will provide the Senior Farm Share program nutrition education and complete an evaluation of the CSA share impact on participant food intake patterns and food security. See section VII of this plan for additional details. DAIL will have a written agreement with UVM Extension outlining the specifications of work to be performed, reporting requirements, and payment mechanism. DAIL will provide the regional FNS office a copy of the FY 2007 agreement with UVM Extension after that document is prepared.

9. *TYPE OF PARTICIPANT*

Indicate the type of SFMNP participants to whom benefits will be issued:

Individuals Households

10. *FEDERAL SFMNP BENEFIT*

Indicate the total Federal SFMNP check or coupon benefit amount for each SFMNP participant:

- \$ 30 in coupons for each farmers market coupon recipient, with a maximum of one older adult/senior participant per household receiving coupons.
- \$50 for each CSA share recipient.

11. *SFMNP CSA BENEFIT*

Indicate the total Federal SFMNP benefit amount for each participant for use at a CSA program if this benefit amount is different than for use at farmers markets or roadside stands: \$ 50.

III. FUNDING

I. FINANCIAL MANAGEMENT SYSTEM

The DAIL operates with a Cost Allocation Plan approved by the Division of Cost Allocation that includes all expenses and revenue. The State uses Peoplesoft accounting software. The State and its Departments have annual audits that review for compliance with A-133 and A-87 cost principles, and USDA Food & Nutrition Services guidelines and instructions.

SFMNP funds will be paid upon documentation of the terms of grant agreements with any sub recipients, an interagency agreement with ESD, and staff approval of required financial and programmatic documentation. DAIL's Aging and Disabilities Senior Planner will approve all payments and provides the information to the business office to process. The business office will review the information for compliance with the terms of any agreements, confirms the math, and processes the bill for payment using the Peoplesoft accounting software.

The DAIL will maintain source documentation for all expenditures for at least seven years unless there is an audit finding requiring maintenance beyond that time.

a) Procedures to Assure Financial Accountability

Market Component:

FMNP financial transactions will be accounted for separately from other program transactions, and only allowable expenses specific to the SFMNP will be supported with federal SFMNP funds. Accounting procedures for program funds will adhere to policies and practices established by the State Department of Finance and Management. The state's financial management information system (VISION) will provide a uniform automated accounting system to state departments and agencies. A unique account identifier code is assigned to each division or program to allow separate financial accounting by program. The Finance Department will assign a vendor number to each farmers market authorized to receive payments. No payments will be made directly to individual farmers participating in the farmers market coupon program. All monies to support the program will be deposited into the State Treasury. Payment requests will be entered into the VISION system by the ESD business office upon receipt of redeemed coupons from a market that have been processed and approved for payment by program staff (*see section V-6 for details*). Unless otherwise instructed by ESD, the State Treasurer will then mail a check directly to the farmers market. If approved by the program coordinator and requested by the market, payments to a market may be made by direct deposit into the market bank account.

CSA Component:

The procedures are the same as for the market component described above except insofar as the CSA farmers are paid by directly by NOFA-VT, according to process described in Section III-2c.

b) Procedures for Obligating Funds

Funds to administer the SFMNP will be included in the ESD and DAIL budgets that are subject to approval by the State Legislature. Once approved, the funds will be allocated to the proper department identifier for payment and tracking of expenditures. On a quarterly basis, the expenditures will be reported to the state Agency of Human Services (AHS), which includes ESD and DAIL among its components. AHS then will draw down funds against the Letter of Credit, at which time they will be credited to the State treasury.

c) Process for Paying Farmers

To avoid repetition in this plan narrative, the details about how farmers markets and their participating produce vendors are paid for coupon redemptions are contained in section V-6.

As part of NOFA-VT's contract with DAIL, NOFA-VT authorizes eligible CSA farms and assigns the number of shares. Each participating farmer signs an agreement confirming the number of shares to be distributed to eligible senior housing sites. Farmers receive the first half of their payment in July, and the balance of their payment in August. NOFA-VT pays farmers directly and is reimbursed by DAIL.

d) Claims Procedures

Market Component:

If ESD determines that an overpayment was made to a market due to an error in counting reimbursable coupons, ESD will bill the market for the amount of the overpayment, or deduct the amount of the overpayment from the next coupon reimbursement if the redemption period is still underway. A final statement sent to each market after the November 10 redemption deadline will serve as a tool for ESD to resolve any remaining financial issues and close out the market's account for the season. If it is determined that an overpayment is related to sanctionable program violations, ESD will bill the market in the amount of the overpayment as part of the written documentation of the violation. If ESD finds that a senior was issued more than \$30 in federal coupon benefits, an effort will be made to recover the excess coupons issued. If they are no longer available, and if the participant received them in good faith rather than intent to abuse the program, the participant will not be penalized for having received additional coupons. If ESD determines that administrative negligence resulted in a participant receiving and redeeming more than \$50 in federal coupons, ESD will use non-federal funds to pay the excess redemption cost.

CSA Component:

Participating CSA farmers are paid in two installments; one-half of the total share price is paid in July, and the remainder is paid in August. If adjustments in the share numbers are necessary, they are often made at the beginning of the program, allowing for an adjusted second payment reflecting the change. If, at mid-season, there is an overpayment to a farmer, due to a decrease in the number of eligible participants being served, or a farmer's inability to meet the contracted number of shares, the farmer will repay the money to NOFA-VT, and NOFA-VT will forward those funds to DAIL.

The CSA Farmer Agreement (*Appendix III-1a*) states that “NOFA-VT can deny payment to the CSA for program funds used for anything other than eligible foods, and may establish a claim against the CSA for payments already made for improperly used Senior Farm Share Program funds.”

e) Time Reporting System

Market Component:

The two ESD staff in the positions described in Part II-6 will keep daily time logs that document the actual hours they spend on FMNP tasks, although federal SFMNP funds will not be used to support those personnel costs.

CSA Component:

All NOFA-VT employees are required to track time and expenses associated with each program on a daily timesheet.

2. *RECORD KEEPING SYSTEM*

All records pertaining to administration of the program, including documentation to support its personnel and operating costs, will be retained by the State for a minimum of three years following the close of an applicable program year. Records will be available for inspection, auditing and copying during normal business hours to authorized representatives of USDA, the U.S. Comptroller General and state agencies participating in the program.

a) Financial Operations

Market Component:

Financial record keeping procedures and forms are described earlier in this section and detailed in section V-6 on coupon accountability. All FMNP coupons will bear unique and sequential serial numbers. The database will enable ESD to track a coupon from its point of origin to a distributing agency, to a specific recipient, and to a specific authorized farmer at a specific authorized market. This assures that program funds are expended only for valid coupons that are properly processed. Redeemed coupons sent to ESD for payment will be batched for storage by market, tally number and date to support the reported market and vendor redemption totals.

CSA Component:

NOFA-VT will document all SFMNP costs separately from costs associated with other NOFA- VT program funds. The NOFA-VT Financial Officer will prepare and submit a quarterly invoice to DAIL.

b) Coupon Issuance and Redemption

The procedures and forms to document coupon transactions are detailed in sections V-1 and V-6.

c) CSA Contracts and Payments

As part of NOFA-VT's grant agreement with DAIL, NOFA-VT authorizes eligible CSA farms and assigns the number of shares. Each participating farmer will sign an agreement (*see Appendix III-1a*) confirming the number of shares to be distributed to eligible senior housing sites. Farmers receive the first half of their payment in July, and the balance of the payment in August. NOFA-VT pays farmers directly and is reimbursed by DAIL. The 2007 agreements will be revised to acknowledge the new \$50 cap on Senior Farm Share program benefits and to include new provisions required by the federal regulations, such as the agreement to receive program training. The 2006 agreement does not obligate the farmer to provide \$X worth of foods for each \$X share they are awarded.

As described previously, DAIL contracts with NOFA-VT to manage the Senior Farm Share program. A copy of DAIL's 2006 sub-recipient grant agreement with NOFA-VT is included in *Appendix II-8a*. Upon execution of the grant agreement, DAIL agrees to pay NOFA-VT one-half of the total amounts paid to participating CSA farmers. Upon receipt of NOFA-VT's summary record of redeemed senior shares (itemizing the payment date, amount and NOFA check number; and CSA farmer identifier and shareholder identifier), a second payment is made for the balance due NOFA-VT minus \$2,000. The final \$2,000 is paid upon receipt of NOFA-VT's final Senior Farm Share program report in early December.

d) SFMNP Participation Reporting

Section V-1 describes participation record keeping in detail.

Market Component: ESD will maintain a central filing system for market and vendor participation data, e.g., participation agreements and vendor number assignments. These files will hold records of any program complaints, monitoring reports, participation data and reports, coupon submission and payment records, and any other correspondence specific to that market.

CSA Component:

NOFA-VT maintains records of the farmer agreements, funds paid to farmers, and Senior Farm Share program participant application forms, per housing site. Senior housing site applications for the Senior Farm Share program are kept on file at DAIL. DAIL will receive reports from NOFA-VT on participation data and review as part of the annual review. As part of DAIL's annual monitoring of NOFA-VT's Senior Farm Share program management, the Aging and Disabilities Senior Planner will visit NOFA-VT to review all program files and records.

e) Staff Time and Administrative Expense Records

Market Component:

The procedure for documenting ESD staff time was described in Section III-1e. The program coordinator will report the distribution of staff hours by program area to the ESD business office on a monthly basis. The coordinator will order the materials used by the program and maintain copies of invoices for printing or other program expenses, and will be required to approve for payment any SFMNP-related invoice received by the business office. However, federal SFMNP funds will not be used to support any ESD personnel or operating costs related to implementing the market component in FY 2007.

CSA Component:

NOFA-VT's procedure for documenting staff time is outlined in Section III-2e. Upon receipt of quarterly invoices from NOFA-VT tracking staff time and other administrative expenses, DAIL's Aging and Disabilities Senior Planner will review invoices and authorize payment.

University of Vermont Extension faculty involved in developing and delivering nutrition education trainings and conducting program evaluation will keep daily time logs of time spent on tasks related to the Senior Farmers' Market Nutrition Program. Following completion of the Senior Farm Share program nutrition education training and program evaluation, UVM Extension will submit an invoice to the DAIL Aging and Disabilities Senior Planner for review and payment approval.

3. *FEDERAL FUNDS REQUEST AND BUDGET*

See Appendix III-3a	FY 2007 Estimated SFMNP Federal Budget
See Appendix III-3b	FY 2007 Estimated SFMNP Federal Caseload Calculation
See Appendix III-3c	FY 2007 SFMNP Non-Federal Budget

IV. CERTIFICATION

A. Targeting Benefits

1. *PLANS TO TARGET BENEFITS*

a) Service Area and Participating Sites

Market Component:

Coupons will be available statewide and distributed by the five Community Action Agencies (CAAs), which collectively have sixteen offices throughout the state (*Appendix IV-A1a*). Coupon allocations will consider the location of participating farmers markets, the number of potential coupon recipients in each CAA area, and to the extent feasible, the anticipated coupon demand and redemption rates. The state is divided into five CAA service areas, and residents may seek services from any CAA office serving their community. Farmers markets expected to participate in the FY 2007 program are listed *Appendix IV-A1b*. Also appended to this plan is a map (*Appendix IV-A1c*) that shows the locations of the CAA offices and markets expected to participate in the FY 2007 SFMNP.

CSA Component:

Benefits are targeted to SFMNP-eligibles by focusing the CSA component on residents of senior housing sites. The CSA farms and senior housing sites expected to participate in the FY 2007 will be identified in April and will be scattered throughout Vermont. Appendix IV-A1d identifies the names and locations of the senior housing sites and partnering CSA farms that participated in the FY 2006 Senior Farm Share program. Once the farms and housing sites have been selected for FY 2007, DAIL will submit a list to the FNS Regional Office.

b) Estimated Distribution of SFMNP among Local Agencies

<u>Local Provider:</u>	<u># of Participants:</u>
Market Component: (1,200 total participants)	
<u>Bennington-Rutland Opportunity Council</u>	<u>216</u>
<u>Central VT Community Action Council</u>	<u>216</u>
<u>Champlain Valley Office of Economic Opportunity</u>	<u>480</u>
<u>North East Kingdom Community Action</u>	<u>156</u>
<u>Southeastern VT Community Action</u>	<u>132</u>
CSA Component: (912 participants)	
<u>NOFA-VT</u>	<u>912</u>

2. *ELIGIBLE INDIVIDUALS TO BE SERVED*

Will all eligible individuals in an SFMNP service delivery area be provided SFMNP benefits, or only specified categories? **(Excluding Expansion)** **(Including Expansion)**

All eligible participants	<u>X</u>	_____
Specified categories/groups:(check all that apply):		
Elderly	_____	_____
Disabled	_____	_____
Lower income level	_____	_____
Other (specify)	_____	_____

3. *WAITING LIST REQUIREMENT*

When all available program benefits have been allocated to eligible participants, will the local agency be required to maintain a waiting list of new applicants likely to be served?

Yes No

Local agencies would only be required to maintain a waiting list if there is a reasonable expectation that more SFMNP benefits may become available to distribute during the current program season.

4. *WAITING LIST INFORMATION*

To enable the local agency to contact applicants on a waiting list when additional benefits become available, will the waiting list include the name of the applicant, date placed on waiting list, and address or telephone number of the applicant? Yes No

5. *OVERLAP WITH WIC FMNP SERVICE AREA*

In States where the WIC Farmers Market Nutrition Program also operates, are the SFMNP service areas the same as the FMNP service areas, or closely overlapping, so that the same farmers markets and roadside stands may serve both SFMNP and FMNP participants?

Yes No

B. Application Process

1. *STANDARDIZED APPLICATION PROCESS*

The State agency requires all local agencies to use a standardized application process for all persons applying for the SFMNP Program. Yes No

2. *CROSS-PROGRAM APPLICATION FORM*

The State agency shares X State wide or _____ at local agency option (check one), a common application or certification form with (check all that apply):

- No other benefit programs
- Commodity Supplemental Food Program (CSFP)
- Food Distribution Program on Indian Reservations (FDPIR)
- Food Stamp Program (FSP)
- Aging Services
- Supplemental Security Income (SSI)
- Reduced price health care program(s)
- Other (specify):

3. *PARTICIPANT ELIGIBILITY NOTIFICATION*

Applicants for SFMNP must be notified in writing of eligibility, ineligibility, or placement on a waiting list (if they are likely to be served) within 15 days from the date of application.

Yes No

4. *15-DAY PERIOD*

The 15 day period begins when the applicant (check all that apply):

Market Component:

- telephones the local agency to request benefits
- visits the local agency in person
- makes a written request for benefits
- makes an appointment

CSA Component:

- telephones the local agency to request benefits
- visits the local agency in person
- makes a written request for benefits
- makes an appointment

5. *PARTICIPANT INSTRUCTIONS*

At least during the initial certification visit, each participant or authorized representative is informed on how to use farmers markets coupons or his/her CSA SFMNP benefits, and on the availability of other services, as set forth in Section 249.6(d)(3) of the SFMNP regulations.

Yes No

6. *PROCESS TO LIMIT CERTIFICATION PERIOD*

The State agency has procedures to ensure that participants are certified only for the current fiscal year's SFMNP period of operation. Yes No

7. *PROXY POLICY*

May a participant designate another person as an authorized representative / proxy to do the following if the participant is unable to (check all that apply):

CSA Component:

- apply for certification?
 shop at farmers markets and/or roadside stands?
 pick up eligible foods from CSA program distribution sites

Market Component:

Proxy representation will not be permitted because the demand for coupons among seniors willing and able to apply for benefits in person exceeds the supply of available coupons, and the aim is to encourage FMNP participants themselves to shop at farmers markets.

8. *DOCUMENTATION OF PROXY DESIGNATION*

If the State agency permits authorized representatives/proxies, are signed statements of the participant required for this purpose per Section 249.6(f) of the SFMNP regulations?

Yes No

9. *NO-COST PARTICIPATION ASSURANCE*

Certification for SFMNP is performed at no cost to the applicant or authorized representative.

Yes No

C. Categorical and Residency Eligibility

1. *CATEGORICAL ELIGIBILITY*

For categorical eligibility, the State agency recognizes:

- Native Americans 55 years of age or older
 Disabled persons under 60 years of age living in housing for the elderly with congregate nutrition services (**This applies only to the CSA component.**)
 An age limit greater than 60 years of age (i.e., 62, 65). If so, please specify:

2. RESIDENCY REQUIREMENT

For the residency requirement, the State agency uses:

- State/ITO residency **(for CSA Component)**
 local agency service area residency **(for Market Component)**

The Vermont SFMNP has no residency requirement per se, but the CAAs serve people who live in their service areas, and CSA shares are only available to residents of participating senior housing sites located in Vermont.

D. Income Eligibility

1. ELIGIBILITY CRITERIA

For income eligibility, the State agency uses:

- maximum gross household income of 185% of annual poverty income guidelines
 maximum gross household income of _____ % (less than 185%) of annual poverty income guidelines
 participation in Commodity Supplement Food Program (CSFP)
 participation in Food Stamp Program (FSP)
 participation in Food Distribution Program for Indian Reservations (FDPIR)
 participation in Supplemental Security Income (SSI)
 member of a family / economic unit participating in the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), or on a waiting list for WIC
 member of a family / economic unit participating in Farmers Market Nutrition Program (FMNP)
 participation in another means-tested program for which income eligibility is set at or below 185% of the poverty income guidelines:

2. HOUSEHOLD DEFINITION

For income eligibility, the household is defined by the State agency as a group of related or nonrelated individuals who are living together as one economic unit.

- Yes No

3. ELIGIBILITY DOCUMENTATION

For documentation of income eligibility, the State agency accepts:

- signed statement of applicant
 notice of eligibility or its equivalent for participation in or certification for other programs
 pay stub or other statement of earnings
 W-2, tax return, or other tax forms
 other:

4. *ELIGIBILITY VERIFICATION*

The State agency requires _____ State-wide, or X at local agency option (check one), the verification of applicant income information.

No Yes (check all sources required, as appropriate):

employer

public assistance offices

State employment offices (wage match, unemployment)

Social Security Administration

school districts/offices

collateral contacts

other (specify): Evidence to confirm household size or that applicant is 60+ years old.

The local agency is expected to request verification if it has reason to suspect that the eligibility information provided by the applicant may be inaccurate or incomplete.

E. Participant Rights and Responsibilities

1. *NOTIFICATION OF INELIGIBILITY*

Applicants for SFMNP, if found ineligible, must be notified in writing of the reason(s) for ineligibility and the right to a fair hearing. Yes No

See section VIII-2 for details about notification and hearing procedures.

2. *NOTIFICATION OF RIGHTS AND RESPONSIBILITIES*

Each participant or authorized representative is informed during the certification process of his/her rights and responsibilities as set forth in Section 249.6(d)(1)-(2) of the SFMNP regulations, including in a language other than English where a significant number or proportion of the eligible population needs this information in a language other than English.

Yes No

3. *NONDISCRIMINATION ASSURANCE*

Per Section 249.7 of the SFMNP regulations, the State agency ensures that no person will be denied benefits, or otherwise discriminated against on the grounds of race, color, national origin, age, sex, or disability. Yes No

4. *NONDISCRIMINATION POLICY NOTIFICATION*

Per Section 249.7 of the SFMNP regulations, the State agency:

notifies the public, participants, and potential participants of the nondiscrimination policy.

notifies participants and potential participants of complaint procedures regarding alleged unlawful discrimination. (See section VIII regarding the complaint process.)

reviews and monitors program activities to ensure compliance with nondiscrimination policies and procedures.

F. Participant and Applicant Confidentiality**1. POLICY REGARDING SHARING OF PARTICIPANT INFORMATION**

Does the State agency share information obtained from applicants and/or participants for SFMNP with any other programs, agencies, law enforcement officials, or any other organizations or persons? Yes No

The response is NO, except as cited below and insofar as local CAAs and senior housing site coordinators will be identifying eligible participants.

2. DISCLOSURE OF PARTICIPANT INFORMATION TO SPECIFIC ENTITIES

Per Section 249.24 of the SFMNP regulations, the State agency restricts the use or disclosure of information obtained from applicants/participants to:

a. Persons directly connected with the administration or enforcement of SFMNP, including investigation and prosecution of SFMNP violations by any public authority;
 Yes No

b. Representatives of public organizations under written agreements for eligibility / outreach purposes regarding other programs, without third party access or disclosure;
 Yes No and

c. The Comptroller General of the United States, General Accounting Office (GAO).
 Yes No

3. PARTICIPANT ACCESS TO INFORMATION

Does the State agency permit an applicant and/or participant access to the information which the applicant and/or participant has provided to the program? Yes No

4. PARTICIPANT RELEASE OF INFORMATION

Does the State agency permit an applicant or participant, upon his/her unsolicited request, to sign a release or similar document allowing the information provided by the applicant and/or participant to be shared with other organizations or persons? Yes No

See clarification in the following part 5 of this section.

5. LOCAL AGENCY RELEASE OF INFORMATION

Does the State agency prohibit local agencies from requiring the applicant or participant to sign a written consent or release form or similar document to share confidential information with another entity or organization during the SFMNP eligibility determination process, e.g., by completing and separating the certification screening process from the request for a release to be signed?

Yes No (if signing a release is a condition of eligibility, please explain)

Each SFMNP participant must agree to the release of their eligibility and benefit issuance documentation to the state agency administering the program component, i.e., DAIL for CSA shares and ESD for farmers market coupons.

G. Dual Participation

The State agency has policy and procedures in place to prevent and detect dual participation (in more than one service delivery area at the same time) by SFMNP participants.

Yes (please describe) No (if no, please explain why not)

Market Component:

ESD will notify the CAAs of the senior housing sites participating in the CSA component. The CAA will emphasize the dual participation prohibition in the certification statement signed by the applicant (*see draft application, Appendix IV-Ga*) if the applicant lives in a participating housing site and would contact the housing site coordinator if necessary to confirm that the applicant is not also receiving CSA share benefits. Coupons will be handled and issued by only one or two seasoned CAA outreach workers assigned to cover specific towns within their agency's service area, so they will know if they have already issued coupons to that household.

CSA Component:

Prior to and during the Senior Farm Share program participant recruitment, a poster will be displayed at each potentially interested senior house site explaining the dual participation prohibition (*see Appendix IV-Gb*). In addition, the senior housing site coordinators will advise all applicants regarding the dual participation prohibition, and that residents may participate in either the market component or the CSA component, but not both. Each Senior Farm Share program shareholder will sign an application form verifying that they are participating in the CSA component (*Appendix IV-Gc*). If a participant is determined to be receiving benefits from both the market component and the CSA component, the participant will receive a notice of suspension/termination and information on how to request a fair hearing.

H. Nondiscrimination

Vermont will comply with all applicable and pertinent laws and regulations regarding the assurance of nondiscrimination on the basis of race, color, national origin, age, sex, or disability.

1. RACIAL/ETHNIC DATA COLLECTION**Market Component:**

All Vermont CAAs receive federal Community Services Block Grant (CSBG) funds to support their organizational infrastructure and anti-poverty program outreach expenses. Since FMNP coupon distribution is integrated into a comprehensive set of information, referral and direct services offered to low income clients by CAAs, the CAA worker completes a CSBG intake on every person seeking Farm To Family coupons before filling out the coupon application. The CSBG intake contains data about household composition, demographics, income, resources, and program participation. It also collects racial/ethnic data that the CAAs report quarterly to the Vermont Office of Economic Opportunity (OEO), another division of the Department for Children and Families that will share that racial/ethnic data with ESD.

CSA Component:

Consistent with procedures for the Commodity Supplemental Food Program, also administered by DAIL, the Senior Farm Share program application form will include a section where the applicant may indicate a self-identified racial/ethnic category, which will be kept on file for all participants. Any racial/ethnic data collected will be reported to DAIL and are accessible only to authorized personnel.

2. *PUBLIC NOTICE OF NONDISCRIMINATION POLICY*

Any publication or media release promoting the SFMNP will include USDA's nondiscrimination statement. SFMNP applicants and participants will be advised at the point of service delivery of their SFMNP rights and responsibilities, including the right to file a discrimination complaint. USDA's "And Justice For All" poster will be displayed at the NOFA-VT office, all local CAA offices, and at housing sites participating in the CSA component. The benefit application will include the USDA civil rights policy statement, and instructions provided to participants will include information about how to file a discrimination complaint.

3. *INCLUSION OF NONDISCRIMINATION IN LOCAL AGENCY REVIEWS*

The local agency review will determine whether the agency is displaying the USDA civil rights policy poster. The review also will verify whether personnel involved in SFMNP service delivery are aware of USDA's nondiscrimination policy and advise SFMNP applicants and participants of their rights.

V. COUPON, MARKET, ROADSIDE STAND, AND CSA PROGRAM MANAGEMENT

1. *ISSUING SFMNP COUPONS TO PARTICIPANTS:*

a) Coupon Storage and Transportation

Market Component:

A commercial printer will ship the coupons to ESD, where they will be immediately inventoried and spot-checked to verify that they were printed and bundled as ordered. ESD will hold the coupons in secure storage until they are hand-delivered to authorized CAA workers. After conducting a physical inventory to verify the quantity and number series of coupons received for distribution, each CAA will sign a Coupon Acceptance Agreement (*Appendix V-1a*) that includes provisions relating to storage and handling of coupons, as do the Coupon Management Instructions provided to each local CAA office (*Appendix V-1b*). Undistributed coupons will be stored in a locked place, an important issue reviewed in local agency monitoring. Coupons will be handled and transported only by personnel authorized to do so on behalf of the applicable state or local agency. Any coupons still undistributed after September 30 will be returned to ESD, where they will be documented by serial number and either destroyed or retained for administrative purposes.

Participating farmers will be instructed to put their vendor number promptly on any coupons they accept to identify the coupon as redeemed and void the coupon. The market will mail redeemed coupons to ESD in business reply FMNP envelopes. After processing the coupons for payment, ESD will store the redeemed coupons and their associated records for at least three years.

b) Benefit Issuance System and Documentation

Market Component:

The printer will bind the coupons in books of ten sequentially-numbered coupons (\$30 total value per book) and ship them to ESD in shrink-wrapped bundles of twenty sequentially-numbered books. Each bundle will have a tag identifying the coupon number series. After ESD inventories the coupons and allots them to local CAA offices, ESD will update the coupon database to identify the local office to which each coupon was allocated.

People must apply in person for the coupons, and the benefit issuance (or notice of ineligibility or placement on a waiting list) happens at the same time the application is completed and signed. ESD allows CAAs to determine their own coupon distribution schedules, and CAAs try to outpost their coupon distribution activities to senior centers, food shelves or other appropriate sites. In most areas, the supply of coupons is either barely or not adequate to serve all the eligible people who go to the CAA offices to apply for coupons. As stated in the application process instructions (*Appendix V-1c*) provided to CAAs by ESD, the CAAs will assure that each participant is informed about the rights, responsibilities and benefits of program participation. The CAAs will send completed application forms to ESD, which will check them for completeness and accuracy and enter the issuance data into the coupon database. The database will have a separate record for each coupon. As issuance and redemption data are entered, the coupon table in the database will identify the local agency that issued the coupon, as well as the farmer who accepted the coupon and market where it was accepted.

CSA Component:

The Senior Farm Share program benefit (\$50) will be provided to eligible seniors at senior housing sites selected through a competitive process. Interested senior housing sites will be invited to submit an application to DAIL outlining their strategy for program implementation. Prior to submitting an application, the senior housing site coordinator will recruit eligible residents for participation in the Senior Farm Share program. Recruitment efforts include the posting of signs, face-to-face information meetings and word of mouth. The DAIL Aging and Disabilities Senior Planner and NOFA-VT's Senior Farm Share Coordinator will review all applications and award shares based on the proposed implementation strategy and availability of funds. Shares are awarded to the senior housing sites based on the following criteria: (1) designated housing site staff person to coordinate all program logistics; (2) availability of transportation to the farm; (3) proximity to a participating CSA farm; (4) availability of on-site community cooking and/or meeting room facility; and, (5) number of eligible participants.

c) System to Track Participant Receipt of CSA Food Benefits

Each Senior Farm Share shareholder receives approximately \$5 worth of fruits and vegetables each week for 10 weeks, for a total senior share value of \$50. Participating farmers use current wholesale price to determine the value of the weekly share, and writes down what each shareholder will receive each week. The shares are picked up at the farm by the senior housing site coordinators. When shareholders pick-up their weekly share, they sign a form documenting their name and date of pick-up. These forms are collected by the senior housing site coordinator and kept on file at the senior housing site. They are available upon request.

d) Participant Instructions**Market Component:**

All coupon recipients will get written and verbal instructions regarding coupon use, including the current Information for Coupon Shoppers leaflet (*Appendix V-1e*). The leaflet will state that coupons may be used only for specific eligible foods at the sites listed therein, that market vendors may not give cash change for coupons, and that the coupons expire on October 31. It will explain how recipients may file a complaint. These policies will be available in Spanish if needed. CAAs will point out that the coupon identifies the eligible foods and expiration date. They will show each recipient the Farm To Family display poster (*see copy, Appendix V-1f*) and instruct the recipient to look for that sign to identify participating vendors at each market.

CSA Component:

Each participating senior receives written instructions on the procedures for delivery and distribution of their shares. In addition, "orientation visits" are held at any newly participating senior housing site, senior housing sites with new participants, or a new farmer. Orientation visits may also be scheduled at alumni sites based on a request by the senior housing site coordinator or farmer, or at the discretion of the Senior Farm Share Coordinator. The farmer is required to attend the orientation visit at the senior housing site. During this orientation visit, the Senior Farm Share Coordinator, farmer, senior housing site coordinator, and senior participants receive a detailed briefing of the program including the eligibility guidelines, quantity and quality of foods that can be expected, share pick up schedule and distribution mechanism, farmer payment, federal SFMNP requirements (i.e. civil rights compliance, participation restrictions) and guidelines for senior participants visiting farms and receiving food and nutrition education.

e) Coupon Issuance Documentation

See Section V-1b for information about any forms used to document SFMNP benefit issuance to valid participants.

2. *AUTHORIZATION OF FARMERS MARKETS, FARMERS AND CSAs*a) Authorization Procedures and Documentation**Market Component:**

Farmers market authorization will be done by ESD, although ESD may ask a responsible party at a cooperating agency to conduct a preauthorization site visit on its behalf. The preauthorization process is described at the end of this section. The Vermont program currently plans to exclude roadside stands. All participating farmers markets will be required to sign an agreement (*Appendix V-2a*) to comply with the Rules and Procedures for Participating Farmers Markets and Vendors (*Appendix V-2b*), hereinafter referred to as the "Rules," the financial policies (*Appendix V-2c*), and other provisions as required by Vermont's program design and federal FMNP policy.

In April, ESD will send enrollment instructions to all markets expected to participate that year. Each market will be required to submit certain data (e.g., current address and FMNP manager, schedule, number of produce vendors and other data that may have changed from the previous year). Markets whose agreements had expired will have to sign a new agreement. The market enrollment process will be completed by early May to allow sufficient time for ESD to prepare and deliver program materials and to hold training sessions before coupon distribution begins.

While ESD will authorize only markets to manage coupon transactions for the market, it will require a signed, one-year vendor agreement from every produce grower seeking to accept Farm To Family coupons. This document will assign a vendor number, certify that the vendor has and agrees to follow the Rules, and provide a consistent method for ESD to annually update its list of participating vendors. Market managers will be responsible for assuring that eligible and interested produce vendors are trained and enrolled. ESD will ease this burden on market managers by sending an April mailing to all farmers who had participated the previous year, urging them to preenroll for the new season by returning a signed Preenrollment Vendor Participation Agreement (*Appendix V-2d*) to ESD in May. The preenrollment solicitation will include any program Rules that changed from the previous year. Pre-enrolling vendors will get a copy of the agreement signed by ESD and assigning them a vendor number valid at any participating farmers market, a list of those markets, and another display poster if needed.

In June, all market managers will get a list of the preenrolled vendors, who usually represent over two-thirds of the participating vendors. The market manager will need to enroll any produce vendor who was not preenrolled by ESD; after assuring that the vendor has and understands the Rules, the manager will have the vendor sign a Single-Market Vendor Participation Agreement (*Appendix V-2e*) for the manager to forward to ESD. Non-preenrolled vendors will have to repeat this procedure at each authorized market where they want to accept coupons. ESD will only reimburse a market for coupons marked with a vendor number for whom ESD has a current preenrollment or single-market agreement on file.

Individuals who contact ESD regarding new markets interested in the program will be sent the Rules and other program information. They will be advised that authorization to participate is not automatic and that they will not be paid for any coupons accepted before ESD signs a market agreement and provides face-to-face training for the market manager. They will be told that the first step will be a documented preauthorization site visit by ESD to observe the market in action and confirm that the site will be adequately managed, a safe place for FMNP coupon shoppers, and a source of coupon-eligible foods. Since all market enrollment, training, and materials-production for each year's program must be completed by early June, new markets generally will not be invited to join the program until the year following the preauthorization site visit. However, where the demand for an additional farmers market in an area is very strong and a site visit was not feasible the previous season, ESD may make an exception and enroll a new market the year of the preauthorization site visit if this is affordable and best serves program needs.

CSA Component:

In March, all CSA farmers in Vermont will be sent written information explaining the CSA component, or as it is known in Vermont, the Senior Farm Share program, of the SFMNP, and a survey asking if they are interested in participating in the program. The Senior Farm Share Coordinator will contact the interested farmers to determine their history and experience as a CSA farm, capacity for providing the senior shares, and area served. The criteria used to authorize CSA programs are outlined in section V-2e.

b) Authorization Criteria for Farmers Markets

For this program, a farmers market is defined as a self-governed association of area residents who assemble at a specific place and time to sell farm products and other goods that they produce directly to consumers. Some market associations operate more than one market. Markets usually include vendors of non-food items and prepared foods ineligible for purchase with FMNP coupons. It is expected, but not required, that all or most items sold at the

participating farmers markets would be Vermont agricultural products or goods made with such products.

Program participation will require that a market: (1) be located in Vermont and sell goods entirely or predominantly produced by its vendors; (2) have a bank account and federal taxpayer identification number; (3) be open for business at least three consecutive hours, at least one day a week, for at least eight consecutive weeks; (4) have at least three vendors who are local produce growers willing to participate in the program, at least two of whom would be selling coupon-eligible foods on a steady basis during most of the market season; (5) designate an individual to be the market's Farm To Family coordinator, referred to as "market manager" in this Plan; and (6) agree that this person will attend a face-to-face training session before any coupon activity occurs at the market. ESD may waive the third and fourth criteria if necessary to provide access to coupon-eligible foods for recipients living in an area unserved by a sizable or season-long farmers market. As explained earlier, a condition of authorization will be written agreement to comply with the program rules and procedures.

A determination as to whether to authorize a new market will be based on the organizational strength of the market, the anticipated volume of eligible foods it may offer, and ESD's capacity to manage another site effectively. Markets enrolled the previous year will be renewed unless the market closes, opts out, or is not renewed due to a budget reduction, the market's coupon redemption or management history or complaints about the market. ESD is not obliged to renew an expired market agreement and may terminate an agreement without cause after giving the market thirty days advance notice.

c) Authorization Criteria for Farmers

This part applies only to produce growers participating in the farmers market component of Vermont's SFMNP. Authorization criteria for CSA farmers appear in part (e) below.

Any person/business that grows fruits, vegetables or herbs on Vermont land or on U.S. land within 25 miles of the Vermont border and sells the produce fresh and unprocessed at a farmers market enrolled in the Vermont program, qualifies to accept Farm To Family coupons for eligible foods sold at that market. However, they will not be authorized to accept coupons until they sign a vendor participation agreement. As detailed in the program Rules (*Appendix V-2b*), farmers who exclusively sell produce grown in the wild or by someone else will not qualify to accept coupons. However, authorized farmers may sell local produce grown in the wild or by someone else in addition to their own produce, provided that the market's own rules allow this. ESD will not limit the amount of such supplemental produce a vendor may sell at the market because it is not in the interest of the FMNP or its recipients to impose such a limit, nor would ESD be able to enforce such a policy.

d) Authorization Criteria for Farmstands

No farmstand or roadside stands will be authorized to participate in Vermont's program, except insofar as a participating CSA farmer may operate a farmstand that also serves as the food pickup site for CSA shareholders.

e) Authorization Criteria for CSAs

The Senior Farm Share Coordinator will contact all CSA farmers interested in participating in the Senior Farm Share program. The initial screening call will determine if the farm has had at least two successful seasons as a CSA, and is located within 25 miles of a participating senior housing site. The Senior Farm Share Coordinator will visit any CSA farm seeking to participate in the program for the first time. CSA farms will be authorized for participation based on the following criteria: (1) farming experience/management and ability to deliver a quality product; (2) proximity to the senior housing site; (3) ability to adjust the CSA shares based on senior dietary restrictions and preferences; and, (4) willingness to partner with a senior housing site for the educational component of the Senior Farm Share program (e.g. participant visits to the farm and farmer participation in the senior housing site orientation visits).

f) Eligible Foods

Vermont SFMNP coupons may be accepted for fresh, unprocessed, locally-grown (as defined in the next section) fruits and vegetables, including but not limited to those in the following table. Produce types that are offered in several varieties are identified with an asterisk (*).

apples	celery	lettuce*	plums
asparagus	chard	melons*	potatoes*
beans*	cilantro	mesclun	pumpkins for eating
beets	corn	mushrooms	radicchio
berries*	cucumber*	nectarines	radishes
bokchoy	eggplant	okra	rhubarb
broccoli	garlic	onions*	scallions
Brussels sprouts	greens*	parsnips	spinach
cabbage	herbs, fresh cut*	peaches	squash, summer*
carrots	kale	pears	squash, winter*
cauliflower	kohlrabi	peas*	tomatoes*
celeriac	leeks	peppers*	turnips

g) Definition of "Locally Grown" Produce

For the purpose of designating SFMNP eligible foods, the State agency defines "locally grown produce" as follows:

- Within the State/ITO borders only
- Within the State/ITO borders and adjacent counties (e.g., one county into the next State)
- Within the county lines
- Other (please specify)

For the farmers market component, coupon-eligible foods must be grown on State of Vermont land or on U.S. land within 25 miles of the Vermont border. For the CSA component, only farms located in Vermont are selected for SFMNP participation.

h) Limits on Market Farmer Eligibility

As discussed in part (c) above, the coupons may be accepted only by authorized vendors who grow coupon-eligible foods to sell at authorized Vermont farmers markets. Where permitted by the market, a participating vendor may accept coupons for eligible foods grown in the wild or

produced by another farmer insofar as those foods are locally-grown and sold in addition to eligible foods grown by the participating vendor (*see Part I of the Rules, Appendix V-2b*).

i) Conflict of Interest

Market Component:

Given the size and resources of Vermont markets, it is inevitable that a participating vendor may also be a market's FMNP manager. There are sufficient controls in place to prevent this dual role from resulting in program abuse. However, no individual holding state-level responsibilities for approving or carrying out FMNP financial transactions, or for compliance monitoring or authorizing the participation of markets or vendors, may be an officer or otherwise responsible for handling financial transactions at any currently participating farmers market. This does not preclude the possibility that a state employee engaged in FMNP administrative work may be a participating vendor.

CSA Component:

If a farmer who contracts with NOFA-VT to perform another service (for example, reviewing organic certification applications) is interested in participating in the Senior Farm Share program, there may be a perception of preferential treatment in authorizing one farmer over another. Therefore, all contracted farmers working for NOFA-VT will sign a conflict of interest form. As for the market component, no individual who is involved in the administrative and financial responsibilities of the SFMNP would be allowed to participate as a CSA farmer in this component.

j) Anticipated Market/Farmer/CSA Participation

Vermont anticipates the following number of farmers markets, farmers, roadside stands, and CSA programs to be authorized in FY 2007:

<u>48</u>	farmers markets
<u>225</u>	farmers
<u>0</u>	roadside stands
<u>25</u>	CSA programs

k) Bonding

Does the State agency require that the Market Manager be bonded? Yes No

3. *AGREEMENTS WITH FARMERS, FARMERS MARKETS AND CSAs*

a) Agreement Types

The participation agreements with farmers markets and their produce vendors, and with CSA farms, were described in detail in section V-2.

b) Agreement Duration

Market Component:

Most markets will have three-year agreements. ESD will assign one-year terms to markets in their first year of FMNP participation or experiencing organizational or produce supply problems that may affect their viability as program participants. All agreements with participating farmers wanting to accept Farm To Family coupons at those markets will have one-year terms.

CSA Component:

The Senior Farm Share program agreements will be valid for one year and renegotiated annually.

c) Agreements with Market Farmers

As explained in section V-2a, ESD conducts Farm To Family financial transactions through farmers markets and not with individual farmers. That section describes and appends the written agreements required of market vendors wanting to accept the coupons.

4. *OTHER ARRANGEMENTS TO AUTHORIZE FARMERS MARKETS OR CSAs*

Except for the role of NOFA-VT-Vermont in the CSA component that was described earlier in this plan, Vermont has no arrangements with other agencies or organizations to authorize participation in the program by farmers, markets or CSA farms.

5. *MARKET AND FARMER TRAINING***Market Component:**

Each June, all participating markets will receive its kit of Farm To Family supplies, e.g., vendor display signs and the forms and envelopes they will need to enroll vendors or submit coupons for payment. The kit will include instructions and reference materials, such as:

- their copy of the market participation agreement, if the market had signed a new agreement;
- the roster of preenrolled vendors for that season;
- reminder regarding the procedure to assure produce vendors are properly enrolled/trained;
- additional copies of the Rules and financial policies and procedures; and
- current income eligibility guidelines for coupon applicants.

The supply kit will be the basis for face-to-face training required for all newly participating market managers and available to any participating market requesting it. The training will occur in private or small-group sessions in early June, before coupon issuance begins. ESD will try to schedule the training in locations that minimize the travel necessary for the trainer and trainees. The training agenda will include a review of program and financial policies and procedures, eligible foods, the prohibition on cash change, coupon voiding and redemption procedures and deadlines, equitable treatment of coupon recipients, complaint and appeal rights and procedures, civil rights compliance, and guidelines for storing and handling coupons.

In its April preenrollment mailing, ESD will notify farmers who took part the previous year about any change in the Rules or FMNP operations. A vendor enrolling for the first time will receive that information from the market manager. The market manager training will emphasize their obligation to train any vendors that they enroll at the market, i.e., assure that their vendors have and understand the program Rules and comply with those policies during the market season. On an ongoing basis, ESD staff will make themselves accessible to market vendors and managers to answer any questions regarding FMNP policies and procedures.

CSA Component:

All farmers who are authorized to participate in the Senior Farm Share program receive the following training:

- For first year farmers, NOFA-VT meets with the farmer to explain the SFMNP rules and Senior Farm Share program procedures.
- For previously authorized Senior Farm Share program farmers, NOFA-VT will meet with the farmer on an as needed or as requested basis.
- Authorized farmers are also provided with an opportunity to participate in ongoing trainings. For example, every year during the months of January – March, NOFA-VT holds a direct marketing conference, in collaboration with the Agency of Agriculture and other state agencies. At that conference, technical workshops are held on topics such as “Increasing Low-Income Access to Local Food Through CSAs.” In addition, NOFA-VT holds on-farm technical workshops in June – September and at least one workshop will be held as a CSA farmer training.

6. COUPON ACCOUNTABILITY**a) System To Identify and Reconcile Coupons****Market Component:**

All coupons will bear unique and sequential numbers matching a serialized bar code. They will identify the coupon expiration and redemption deadlines, and will be managed with a record keeping system that will enable ESD to track a coupon from its point of origin to a local CAA office to a recipient, and if redeemed, to a specific vendor at a specific farmers market.

As described in Part V-1, the CAA coupon acceptance agreements and completed application forms will identify the serial numbers of coupons received and require signatures certifying to that information. CAAs will send any completed applications to ESD at least once a month until the coupon supply is exhausted. CAAs periodically will inventory available coupons and immediately report to ESD any apparent loss or theft of coupons. In the event that coupons are stolen from a distributing agency or coupon recipient, the program will not penalize a farmer or market for accepting or redeeming those coupons in good faith. ESD will monitor coupon redemption data to determine if and where any of the lost or stolen coupons are redeemed.

Each participating vendor will be assigned a unique vendor number (*see section V-2a*) and put that number on every coupon accepted before giving the coupon to the market manager for payment. The market manager will verify that each coupon is numbered, count the coupons by vendor, and transmit them to ESD in a postage-paid program envelope provided by ESD. The market will enclose a completed Market Tally of Redeemed Coupons (*Appendix V-6a*) that itemizes redeemed coupons by vendor number. The market will enclose with the tally any new Single-Market Vendor Participation Agreements the market secured from its produce vendors.

Within ten business days after coupons are received, ESD will authorize payment to the market in the amount of the verified total of valid redeemed coupons in that batch. ESD's first step will be to add any new vendors to the database and screen each tally to determine if it includes coupons submitted for vendors for whom no agreement is on file or enclosed with the tally. Any such coupons will be considered invalid and returned to the market with explanation but without payment. ESD also will disallow payment for any expired coupons submitted by a market outside the redemption deadline.

Each coupon will be imprinted with a serialized bar code to be scanned into a relational FMNP database that contains the coupon serial numbers valid for that year plus data on the market, vendor, recipient and local agency applicable to each coupon. After the initial tally screening, ESD will enter the market, tally and vendor data into the database, and scan each coupon bar code into the database with a hand-held wand. The system will automatically reject any coupon whose serial number is not valid that year, or that had already been redeemed or was submitted for an unauthorized market or vendor. ESD will advise the market of any errors in the market's manual count and send the market a copy of the corrected tally form. The State finance department will initiate a payment in the authorized amount and transmit the payment to the market. The market manager will deposit this payment in the market bank account to replenish funds available to pay participating vendors for redeemed coupons. In November, ESD will give each market a final statement that identifies the total coupon redemption payments to the market.

ESD will invite the most organizationally stable markets (e.g., larger markets unlikely to have year-to-year changes in federal identification number or mailing address) to receive payments in the form of direct deposits electronically transmitted by the State into the market bank account. Markets accepting this option will have to provide bank account data for ESD to convey to the State finance department. The finance department will mail a notice to the market each time an electronic fund transfer is made.

ESD will document the serial numbers and disposition of any coupons that were printed but not issued, and of coupons that were expired, voided, lost or not matching issuance records. To facilitate timely reconciliation of coupons and monitor redemptions, ESD will urge markets to submit coupons for payment weekly. Markets will be expected to pay vendors promptly for coupons accepted, and it can take three weeks for a market to receive State reimbursement. Therefore, ESD will use non-federal funds to offer markets a modest, one-time cash advance to prevent market cash flow problems resulting from redemption payments to vendors. The market will have to request the advance in writing and refund it in accordance with the Financial Policies and Procedures (*Appendix V-2c*).

CSA Component:

There are no "food instruments" for this component. However, NOFA-VT will use the CSA share benefit receipt records described in section V-1c to assure that shares awarded are fully utilized and that claims are established to recover from CSA farmers the value of any share that is not provided to a Senior Farm Share program participant.

b) System To Assure Redemption by Authorized Entities

Market Component:

As explained in section V-6a, the coupon management system will assure that ESD only pays for coupons redeemed by authorized entities that had agreed in writing to redeem coupons only for eligible foods and under stated conditions. The Rules (*Appendix V-2b*) require market managers to monitor vendor behavior and report any vendor suspected to be in violation, and to require vendors to put their vendor number on each coupon. Markets or vendors in violation will be subject to disqualification or other sanction measures, and are informed of this when they sign participation agreements. ESD will review the restriction of coupon sales to eligible foods by authorized vendors at authorized sites in the monitoring process, which will entail unannounced visits. Recipients will be instructed about the foods eligible for coupon purchases and given a list of the authorized market sites and their schedules. Recipients also will be advised to look for the Farm To Family posters to identify participating vendors at the markets.

CSA Component:

Payments will be made only to CSA farms that are authorized to participate in the current program, as described in section V-2.

c) System to Disallow Invalidly Redeemed Coupons**Market Component:**

This part applies only to the market component. The market/farmer authorization and coupon reconciliation procedures described earlier will assure that ESD does not make payments involving markets or farmers that are not authorized to accept coupons, and that invalidly redeemed coupons will be rejected for payment. The participation agreements, and the coupon itself, will specify the dates for coupon expiration, for vendors to submit coupons to the market manager, and for the market to submit coupons to ESD for reimbursement. Market managers will be urged to collect accepted coupons from vendors at the end of each market day, to pay the vendors promptly upon verifying the value of coupons accepted, and to submit coupons to ESD for reimbursement frequently. ESD will offer markets only minimal cash advances in order to motivate them to send coupons to ESD on a steady basis. The market manager will be responsible for collecting any remaining coupons from participating vendors when the market closes for the season or after the October 31 expiration date, whichever is sooner. To qualify for reimbursement, this final batch of coupons will need to be sent to ESD by November 10, as stated on each coupon and in the Market Participation Agreement.

d) Coupon Time Frames**Market Component:**

- | | |
|---|--------------------------------|
| (i) Redemption by participants: | <u>Late June – October 31</u> |
| (ii) Submission for payment by farmers markets: | <u>Late June – November 10</u> |
| (iii) Payment by the State agency: | <u>July 1 – December 5</u> |

CSA Component

- | | |
|------------------------------------|------------------------|
| (i) Redemption by participants: | Late June - |
| (ii) Submission for payment: | Late June – December 1 |
| (iii) Payment by the State agency: | July 1 – December 15 |

e) Description of SFMNP Food Instruments**Market Component:**

This part applies only to the market component. A copy of Vermont's coupon appears as *Appendix V-6b*. It is updated annually to reflect the current coupon expiration and redemption dates and serial numbers. All coupons will be in denominations of three dollars (\$3.00), bear unique and sequential serial numbers and serialized bar codes, and identify the eligible foods and time frames within which the coupon will be valid for redemption and payment.

VI. MANAGEMENT EVALUATIONS AND REVIEWS

1. *PLANNED REVIEWS OF MARKETS, FARMERS AND CSAs*

FY 2007	Number	Number Planned for Review
Local Agencies	6	3
Authorized Farmers Markets	48	8(minimum 10%)
Markets with high-risk farmers	12	6
Other markets	36	2
Authorized Farmers	225	30(minimum 10%)
High-risk farmers	15	8
Other farmers	210	22
Authorized Roadside Stands	0	n/a (minimum 10%)
High-risk roadside stands	0	n/a
Other roadside stands	0	n/a
Authorized CSAs	25	3 (minimum 10%)
High-risk CSAs	1	1
Other CSAs	24	2

For the market component, farmers markets, not individual farmers, are the entities with which ESD will conduct SFMNP-related financial transactions. Nevertheless, ESD reviews at least ten percent of its participating farmers and of its participating markets each year.

2. *HIGH-RISK MARKET/FARMER/CSA CRITERIA*

Market Component:

Criteria used to target markets and vendors as "high-risk" for the purpose of compliance monitoring, based on program participation and coupon redemption data, will include the following:

- farmers markets (and their produce vendors) in their first year of program participation;
- markets expected to redeem over \$5,000 in coupons for the season;
- vendors expected to redeem over \$2,000 in coupons for the season;
- participating markets or vendors about whom ESD received two or more complaints over a consecutive two-year period; and
- as required by FNS, a vendor redeeming a high volume of coupons compared to other vendors at the market, bearing in mind that this volume may be small at a market where few coupons are redeemed.

ESD will not refer to these criteria in communicating FMNP policies to markets and vendors because that would imply that a certain degree of rule violation is acceptable.

CSA Component:

A high risk CSA farmer is defined as a farmer who has not yet completed one successful CSA season; that has a history of production problems due to labor, health or weather; or that has shown an inability to provide the full SFMNP benefit to any participant.

3. *FARMER/MARKET/CSA SANCTIONS*

Market Component:

ESD may disqualify any market or vendor not offering FMNP-eligible foods or found to be violating FMNP requirements. Sanctions may be imposed against the market or vendor for

violations of a market or vendor participation agreement, following an investigation. Sanction policies and procedures will be detailed in the Rules given to all markets and vendors prior to their signing participation agreements, and will be noted in the agreements themselves (*see Appendices V-2a, 2b, 2d and 2e*).

CSA Component:

The CSA farmer agreement (*Appendix III-1a*) states that NOFA-VT can deny payment to the CSA for program funds used for anything other than eligible foods, and may establish a claim against the CSA for payments already made for improperly used SFMNP funds. It also provides that NOFA-VT can take action against a CSA for violating the terms of this agreement, giving the CSA at least fifteen days advance written notice stating the adverse action, its causes, and the effective date. Adverse actions may include disqualification from the Senior Farm Share Program, a probationary period, or reduction in the number of shares the Senior Farm Share Program will purchase from the CSA. The CSA may appeal any adverse action within fifteen days of the date of the adverse action notice.

4. *LOCAL AGENCY REVIEWS*

Market Component:

The review will examine SFMNP administrative practices, e.g., transportation and storage of food instruments, issuance procedures to prevent dual participation and confirm participant eligibility, compliance with nondiscrimination policies, and protection of participant data. To the extent feasible, reviews will be scheduled during times when SFMNP benefit activities are underway and observations of those activities may be included in the review.

ESD will review CAA activities (see draft *Appendix VI-4a*).

CSA Component:

At least once per year, the DAIL Aging and Disabilities Senior Planner will complete an on-site review of NOFA-VTs performance managing the Senior Farm Share program. DAIL will develop a review form for the monitoring review.

VII. NUTRITION EDUCATION REQUIREMENTS

1. *NUTRITION EDUCATION FOR SFMNP PARTICIPANTS*

Market Component:

The brochure given to every coupon recipient (*Appendix V-1d*) will include a Vermont seasonal harvest calendar and tips about the health benefits of eating enough fruits and vegetables and for shopping at farmers markets. As noted in its instructions to CAAs (*Appendix V-1___*), ESD encourages the CAAs to provide additional nutrition information or activities as part of their coupon distribution process, and to adapt the nutrition discussion to the interest and experience of the particular applicants. Most CAAs offer participants materials such as copies of the Food Guide Pyramid, fact sheets on produce selection and storage, or recipes using locally grown produce. Where logistically feasible, CAAs will have a display featuring information on nutrition and nutrition resources at their coupon distribution sites.

CSA Component:

UVM Extension faculty will conduct nutrition education trainings for local senior housing site coordinators in three regions of the state. Trainings will prepare the senior housing site coordinators to deliver simple nutrition lessons at the housing site approximately five times

throughout the growing season in conjunction with the share distribution and pick-up. Lessons will focus on the storage, preparation, and nutrition of select vegetables or fruits that are considered less familiar to program participants. Lessons will draw on the *Eating What We Grow* book prepared by UVM Extension in 2000 and recently updated to reflect the 2005 *Dietary Guidelines for Americans*. At the time of the trainings, housing site coordinators will receive written materials that support the lessons, including recipes and storage tips. Senior housing site coordinators will be encouraged to prepare a simple dish for taste tests when they deliver each lesson. Lessons will be timed to coincide with CSA produce distribution day.

2. NUTRITION EDUCATION SETTINGS

Market Component:

Nutrition education takes place one-on-one at the coupon distribution sites. While most coupon issuance occurs at CAA offices, it may also take place in other community sites, such as senior centers, local churches, community meal sites, food shelves or low income housing sites.

CSA Component:

The group nutrition education sessions will take place at the senior housing sites on the day of share distribution.

3. COORDINATION WITH OTHER AGENCIES/PROGRAMS

Does the State agency coordinate with other agencies around issues related to nutrition education and promotion? No Yes (If yes, check the applicable partnerships below):

- Food Stamp Program (FSP)
- Team Nutrition
- Area Agencies on Aging
- Commodity Supplemental Food Program
- Children and Adult Care Food Program (CACFP)
- Temporary Assistance for Needy Families Program (TANF)
- Food Distribution Program on Indian reservations (FDPIR)
- Other FNS programs (specify): WIC and the Child Nutrition Program
- Expanded Food and Nutrition Education Program (EFNEP) and/or Cooperative Extension Service
- Other government programs (e.g., 5 A Day, etc.)
- Non-profit organizations (specify): VT Campaign To End Childhood Hunger (VTCECH); VT Foodbank; NOFA-VT
- For-profit organizations (specify):
- Industry (specify):
- Professional organizations (specify):
- Educational Institutions (specify):
- Religious Institutions (specify):
- Other (specify):

4. METHODS FOR COORDINATING WITH OTHER AGENCIES/PROGRAMS

Comprising the Vermont State Nutrition Action Plan (SNAP) team, DAIL and ESD join VTCECH nutritionists and people who operate the state's WIC, EFNEP, child nutrition, elderly nutrition and federal commodity programs in identifying effective nutrition messages and ways to convey them consistently to Vermonters. One SNAP product is a new Eat For Health component to the Department of Health website; the "eat for health" theme was generated by the SNAP team's nutrition message formative research project. The <http://healthvermont.gov/eatforhealth/> site will be expanded and refined over time, and contain tips about foods in season, recipes, menu planning, and other nutrition information.

5. NUTRITION EDUCATION MATERIALS

Materials currently being used for SFMNP nutrition education were described above in section VII-1.

6. NEW MATERIALS PROMOTING CURRENT DIETARY GUIDELINES

Does the State agency plan to develop new participant educational materials containing the current Dietary Guidelines for Americans messages? Yes No

If yes, please describe the elements below.

7. PROGRAM IMPACT ASSESSMENT

Market Component:

Every year, ESD will invite coupon recipients to return a survey (*Appendix VII-7a*). The survey will ask if recipients bought fruits or vegetables they had never tried before and other questions to assess whether the program affected fruit or vegetable consumption. This survey will be revised every year so it can address current data needs, such as recipient input on the coupon denomination amount. ESD does not plan to survey participating farmers in FY 2007. Farmers are surveyed less often than recipients because there is less turnover in farmer participation than in the recipient caseload.

CSA Component:

UVM Extension has conducted a written pre and post assessment survey annually since the Senior Farm Share program began. The survey was modified in 2006 to improve Vermont's ability to interpret program impacts. The survey is distributed to all Senior Farm Share program participants in order to measure the impact of the whole program, not just the optional nutrition education requirement. UVM Extension compiles and analyzes the survey data. A copy of the FY 2006 questionnaire is attached (*Appendix VII-7b*).

VIII. MISCELLANEOUS REQUIREMENTS

1. CIVIL RIGHTS

Any person in the state who has a complaint of discrimination may direct that complaint to the Vermont Human Rights Commission, whose authority includes the area of public accommodation. The Commission will investigate only complaints lodged within one year after the alleged discrimination occurred and generally is able to address the complaint within 120 days after it is received.

Market Component:

The discrimination complaint process is detailed in Part II of the Rules (*Appendix V-2b*) provided to each participating farmers market, farmer and CAA. ESD will automatically refer any complaint of discrimination on the basis of race, color, national origin, age, sex or disability to the Director of the USDA Office of Civil Rights in Washington, D.C. for investigation. This policy will be stated on the Complaint Report form (*Appendix VIII-1a*) and the Information For Coupon Shoppers brochure given to recipients with their coupons. ESD does not plan to use radio or television public services announcements to promote the FMNP, but would include a statement that "the FMNP is an equal opportunity provider" in any such promotion.

CSA Component:

Consistent with Vermont's Commodity Supplemental Food Program procedure, if NOFA-VT receives a complaint of discrimination of any kind, they will promptly document it and forward the complaint to DAIL. The Department will conduct an investigation within 5 working days and respond to the complainant within 10 working days of the completed investigation. DAIL will also forward a copy of all complaints and investigation results to the Director of the Office of Equal Opportunity at USDA. The use of this procedure would not preclude the complainant from also filing a complaint with the Vermont Human Rights Commission.

2. HEARING AND COMPLAINT PROCEDURES

a) Hearing Procedures

Market Component:

Markets and Farmers: Participating farmers markets will be required to offer a timely appeal process to any eligible produce grower who sells eligible produce at that market and whose request to accept coupons is denied by the market. The appeal rights and procedures for vendors or markets that are suspended or disqualified from the program will be described in the Rules (*Appendix V-2b*). For a farmers market rejected for participation for reasons other than the authorization criteria described in Part V-2b, or for an eligible produce grower denied by a market and dissatisfied with the outcome of his/her appeal to the market, the following process will apply: (1) the applicant will be informed of the decision and the reason(s) for the denial; and (2) the applicant will have ten days to appeal to the State by requesting a hearing before a three-person Appeals Committee to be chaired by the ESD Food and Nutrition Program Chief or his/her designee and include representation from the Department of Health. The hearing will be scheduled within three weeks after the hearing request is received by ESD.

Local Agencies: To contain administrative costs and to assure well-coordinated and unduplicated access to services statewide, ESD needs to limit the number of its local agencies to five, each of which would be assigned a specific region of the state. Each agency would need a

demonstrated capacity to target services to low income households throughout the region, to comply with program policy and accountability requirements, and to absorb its SFMNP service delivery costs. A local agency whose request to distribute SFMNP coupons is denied by the program coordinator may appeal that decision to the ESD Food and Nutrition Program Chief. If the agency is dissatisfied with the outcome of that appeal, it may then direct its appeal to the ESD Deputy Commissioner.

Coupon Applicants:

Coupon Applicants: The following describes the appeal process for someone denied SFMNP coupons due to ineligibility. This process is modeled after procedures that Community Action Agencies (CAAs) use in delivering crisis services for ESD's federal fuel assistance program:

- The CAA worker will explain why the applicant is considered ineligible and invite the applicant to provide any additional information that might change that decision. If no such additional information is available, the CAA worker will give the applicant a completed Notice of Decision (*Appendix VIII-2a*) and will advise the applicant that they may appeal the decision immediately if they disagree and may have someone else represent or help them with that if they want.
- The applicant will appeal first to the CAA director or designee, who will render a decision on the appeal within one working day. If the CAA director or designee decides that the applicant is eligible, the CAA will provide coupons to the applicant. ESD will hold some coupons in reserve for this purpose in case the CAA runs out of coupons while an appeal is pending.
- If the applicant is still denied coupons and disagrees with the CAA appeal outcome, the CAA will advise that that applicant has 30 days to request a fair hearing from the State and point out the fair hearing contact information in the Notice of Decision.
- The CAA will immediately provide ESD copies of the completed application and Decision Notice and any other document available from the CAA or applicant that pertains to the applicant's eligibility.
- Upon receiving a verbal or written request for a fair hearing, along with the application and notice documents from the CAA, the ESD program schedule a fair hearing before the state Human Services Board. Human Services Board procedures are compatible with the provisions in §249.16 of the SFMNP regulations, e.g., an impartial decision making process that entails adequate time frames, opportunity to be represented by counsel or another representative, and documentation of the procedure and any data relevant to the appeal.
- If the Board decision favors the applicant, ESD will provide coupons to the applicant. If a Board decision favoring the applicant is made after the October 31 coupon expiration date, ESD will use nonfederal funds to compensate the applicant for the value of senior coupons they would have received on the initial application date._____

CSA Component:

All Senior Farm Share applicants denied program benefits and farmers denied program participation will be informed in writing of their right to a fair hearing at the time they are notified that they are ineligible. This notification will outline the information needed for a fair hearing, and define the rights and responsibilities of all parties.

Applicants denied benefits before share distribution begins will not receive benefits before the hearing officer makes a decision. Farmers denied program participation will not receive pre-season assignment to a partner senior housing site. A request for a fair hearing may be denied if:

(a) the request is not received with 60 days from the date the NOFA-VT mails or gives the participant/applicant or farmer the notice of adverse action; (b) the request is withdrawn by the appellant or representative in writing; (c) or the appellant fails to appear at the hearing without a good cause.

Conduct for the fair hearing, including all notifications, is the responsibility of the Agency of Human Services. Hearings will be conducted by an impartial official with no personal stake or involvement in the decision and who was not directly involved in the initial determination of the action being taken. The Hearing Officer will: (a) ensure that hearings are scheduled within three weeks of the date the initial request is received; (b) provide written notice of the time and place of the hearing and an explanation of the hearing procedure to all parties at least ten days before the hearing date; (c) administer oaths of affirmations as required by the State; (d) ensure that all relevant issues are considered; (e) request, receive and make part of the hearing record all evidence determined necessary to decide the issues being raised; (f) regulate the conduct and course of the hearing consistent with due process to ensure an orderly hearing; (g) order, where relevant and necessary, an independent medical assessment or professional evaluation from a source mutually satisfactory to the appellant and the State Agency; (and (f) render a hearing decision which will resolve the dispute, within 45 days of the initial request for a hearing.

b) Complaint Procedures:

Market Component:

ESD will address any complaint no later than five working days from the date it is received. ESD will make available a standardized complaint form (*Appendix VIII-1a*) to record a complaint from any source. The complaint process is detailed in Part II of the Rules (*Appendix V-2b*), and is copied to all participating markets, vendors and CAAs. The "Information" brochure given to each coupon recipient will notify them of their right to lodge a complaint. Documentation of complaints received by ESD will include the complaint date, name of person taking the complaint, description of the complaint, its source, and any actions taken as a result. Cooperating agencies will be expected to refer complaints from the general public to ESD for resolution. Vendors will be encouraged to inform the market manager of any problems or complaints, and to resolve them locally if possible. Any problem that cannot be addressed locally will be referred to ESD for investigation. If a coupon recipient writes comments on a program survey indicating that a particular market or farmer may be violating program rules, ESD will treat that as a complaint and respond accordingly if the recipient is identifiable and able to provide any additional information that ESD may need to verify and act on the problem.

CSA Component:

The NOFA-VT Senior Farm Share Coordinator will document any complaint from a participant, non-participant or farmer including the date, source of complaint, and nature of complaint. All complaints are filed in a "complaint file" and kept in the Senior Farm Share Coordinator's office, along with other program files. Upon receipt of a complaint, the Senior Farm Share Coordinator will contact the complainant by telephone, followed by an on-site visit, whereupon attempts will be made to resolve the issue. The outcomes of complaints including actions taken and results of those actions will be detailed in the complaint file.

3. DRUG FREE WORKPLACE

As part of its personnel policies and procedures, the State of Vermont will maintain and enforce a Drug-Free Workplace Policy (*Appendix VIII-3a*) at all SFMNP worksites, including those identified in section IV-A1 of this state plan.

4. LOCAL AGENCY DEBARMENT/SUSPENSION

Per 7 CFR 3017.300, the SFMNP State agency has on file either 1) a current local agency certification in a format established by the State agency; or, 2) a local agency contract including assurance on debarment / suspension, which may be satisfied by the local agency debarment/suspension certification provided for another program if it covers the same period as the SFMNP local agency contract; or, 3) a record showing that the SFMNP State agency had checked the Excluded Parties List System (EPLS) for each local agency. Yes No

The EPLS was checked to confirm that none of the six local agencies (NOFA-VT and Vermont's five Community Action Agencies) have been suspended or debarred.

5. LOCAL AGENCY LOBBYING CERTIFICATION AND PROCEDURES

Per 7 CFR 3018, the SFMNP State agency has on file the current form FNS-732, Certification Regarding Lobbying, for each SFMNP local agency with a sub-grant exceeding \$100,000, if any. Yes No – NOT APPLICABLE

The CAAs receive no grant for their SFMNP services, and SFMNP funding to NOFA-VT for its role in the CSA component will be far below the \$100,000 threshold for this requirement.

6. SF-LLL ON FILE

The SFMNP State agency has on file the current SF-LLL, Disclosure Form to Report Lobbying, if lobbying occurs with non-federal funds, for each SFMNP local agency with a sub-grant exceeding \$100,000, if any?

Yes No – NOT APPLICABLE (see clarification in #5 above)

7. SF-LLL TRANSMISSION

The SFMNP State agency has provided a copy of any such disclosures to the FNS Regional Office. Yes No