

DATE: December 6, 2024

POLICY NO: FD-158: Commodity Supplemental Food Program (CSFP)

SUBJECT: Identity Verification at Time of Distribution

TO: Regional Directors
Supplemental Nutrition Programs
MARO, MPRO, MWRO, NERO, SERO, SWRO, and WRO

State Directors
CSFP State Agencies and Indian Tribal Organizations (ITOs)

This memorandum provides CSFP State agencies, including ITOs, with guidance on the requirements for verifying the identity of CSFP participants prior to the distribution of USDA Foods. Beginning on December 30, 2024, program regulations require State agencies to have a process in place outlined in their State Plan for local agencies to verify the identity of a participant or their proxy before the distribution of USDA Foods. State agencies that would like to make changes to their process for verifying the identity of participants at the time of distribution should submit a State Plan amendment following the process outlined in FD-157, Guidance for Submitting Amendments to CSFP State Plans. This guidance does not apply to the certification and recertification of CSFP participants. As per 7 CFR 247.8(a), CSFP applicants and participants must still provide some form of identification at the time of certification and recertification.

Flexibilities for Verification of Identity

Per requirements at 7 CFR 247.6(c) and 247.10(b), State agencies have the flexibility to set their own parameters to verify the identity of participants or their proxies prior to distribution of food packages, provided the method is in line with regulatory requirements, including that USDA Foods are only distributed to CSFP participants per 7 CFR 247.10(b). State agencies may

set parameters that include different options for verification of identity but must ensure that all method(s) are available to all participants. State agencies must ensure that one type of participant is not subject to additional verification beyond what others are subject to. For example, an option for verifying identity available to participants receiving home delivery must also be available to participants picking up their food package at a distribution site. State agencies should ensure that any identity verification process aligns with CSFP confidentiality protections found at 7 CFR 247.36.

Examples of possible processes that State agencies can implement include:

1. Allowing participants or their proxies to self-attest or otherwise verify their identity by stating their name, signing a document, or otherwise verbally confirming their identity;
2. Requiring local agency staff, volunteers, or third-party contractors distributing USDA Foods to check some form of identification of a participant or their proxy one time or on a cyclical basis, and then allowing the use of visual identification or self-attestation as identity confirmation at future USDA Foods distributions; or
3. Requiring that participants or their proxies present some form of identification each time they receive USDA Foods. Documents that identify individuals can include (but are not limited to) government-issued IDs, unique cards provided by distribution sites to CSFP participants at the time of certification or recertification, pieces of mail, etc.

This list of examples is not intended to be exhaustive and State agencies are encouraged to identify other processes to verify the identity of participants or their proxies in ways that lower administrative burden while ensuring that CSFP food packages are distributed to intended individuals. This includes exploring the use of new and emerging identity verification technologies. Innovative identity verification processes may allow State agencies to modernize the program's delivery methods through partnerships with third-party entities

that deliver food packages directly to participants' homes.

State Plan Amendment Submissions

To implement a change to the process for verifying the identity of participants at the time of distribution, State agencies must submit a State Plan amendment following the process outlined in FD-157, Guidance on Submitting Amendments to CSFP State Plans. At a minimum, the following information must be included:

- A description of the process to verify the identity of CSFP participants or their proxies prior to the receipt of USDA Foods.
- A description of why the change is being proposed.
- A description of the implications of the proposed change, including any risks or program integrity concerns associated with the process identified by the State agency.

State agencies should contact their respective [FNS Regional Office](#) with any questions about this memorandum.

/Original Signature on File

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