

FAQs on the Revised TEFAP 2025 Self-Declaration of Need and the USDA Final Rule – Improving Access and Parity in Food Distribution Programs

Frequently Asked Questions

Q. Please confirm; the food distribution partners can no longer ask to see photo identification to verify residency?

A. Correct; requesting identification is strictly prohibited. Agencies are no longer allowed to ask for any identifying information other than the items included on the form: name, county and zip code of recipients.

Q. Does this rule change apply to the proxy as well?

A. No. Proxies are still required to show identification when picking up food for a recipient/participant's behalf. Those rules have not changed.

Q. Can we still ask for a contact phone number and write it on the TEFAP Self-Declaration of Need form or sign-in sheet for recall purposes?

A. As far as recalls, you can still ask for phone numbers and/or email addresses, however you are not permitted to share that information with anyone without written consent.

Q. Some partners collect additional information from food recipients for complimentary program purposes. For example, a pantry might also offer holiday gifts or clothing and collect information such as address, names/ages of family members, etc. to support the non-food program. Can this data collection continue at the same time/place as the food distribution?

A. Yes, partner agencies can still collect this information separately from the TEFAP self-declaration of need form. They must disclose in the data collection process that the information obtained will not determine their eligibility for or food received from TEFAP. If information collected for TEFAP purposes is used or shared with another program, then a written consent from the TEFAP recipient must be incorporated into the TEFAP initial visit when the self-declaration of need form is completed or at sign-in at a repeat visit.

Q. Can we ask the ages of the people in the household? This is unclear in the memorandum. It just says they “self-declare” household size and doesn’t specifically say by age group even though the form still has the age category section at the top of form.

A. Ask how many household members fall in each age category for reporting purposes only.

Q. Can we ask anything about household income over the phone? Or do they just self-declare at the time they pick up the food based on what they see on the form for the first time?

A. Everything is strictly self-declared and subject to all confidentiality rules listed in the memorandum.

There is no change to the income eligibility process. Income has always been self-declared and should be presented as such during inquiries regarding eligibility.

Q. True or false? We can no longer ask to see proof of address or zip code (i.e. – recent utility bill) on the first visit. Even if we don't copy it or document the address in any way?

A. Everything is strictly self-declared, no verification or proof permitted. All documentation is subject to confidentiality rules listed in the memorandum.

Q. Since we can no longer check, gather or maintain address information (street address, city), should we shred the forms prior to the 2024-2025 year and remove same street address/city info from electronic records.

A. There are no changes to document retention policies. Forms completed with address information should be kept on file for three years plus the current year and should be kept in a secure location to ensure confidentiality.

No information on those previously used forms can be shared at any time with any agency or program unless fully "scrubbed" (meaning all identifying information has been removed/blacked out – addresses, identifying household information, etc.).

Any electronic record-keeping system will need to remove the address requirement and replace it with the zip code and county only to reflect the changes to the TEFAP program. They will not need to remove prior collected information from their system; however, they are unable to share that information with any other agency/program without scrubbing it for identifying information.

Q. How will these changes impact current or future use of Service Insights, Feeding America's platform for electronic registration and data collection that we are beginning to use with CEO Weinberg Food Bank partners?

A. Service Insights has been updated to reflect the TEFAP changes. The system now has a stop point after the self-declaration of need form section is completed and eligibility determination is complete and communicated to the recipient. A written consent for additional data is incorporated in Service Insights before the collection of more data. The data collected cannot be used for TEFAP eligibility.