



## Ohio Senior Farmers’ Market Nutrition Program (SFMNP) Guidelines during Pandemic & Frequently Asked Questions (FAQs)

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The Ohio Department of Aging (ODA) remains committed to the objectives of Ohio’s Senior Farmers’ Market Nutrition Program (SFMNP): providing low-income seniors with access to locally grown produce; increase the domestic consumption of agriculture commodities; and aid in the development of new and additional farmers’ markets, roadside stands, and CSA programs.

During this unprecedented time of the COVID-19 pandemic, SFMNP operations will require adjustment to ensure older adults and authorized vendors, including farmers and farmers’ market vendors remain safe. Certified farmers’ markets, farm and produce stands, and other establishments engaged in the retail sale of fresh produce have been designated as essential under section 12.b of the Stay at Home Order. With that said, providing COVID-19 poses the level of risk we are currently experiencing, Ohio SFMNP must operate under modified conditions to protect the health and well-being of all community members. ODA recommends modifying Ohio SFMNP operations for the duration of the 2020 program.

### GUIDELINES DURING PANDEMIC

#### Alternative SFMNP Models

This guidance is issued based on the source of funding (USDA or State General Revenue Funding (GRF)) allotted to each AAA, due to differing regulations. Category 1 guidance includes those agencies that receive only USDA funds for SFMNP operations. Category 2 guidance includes those agencies that receive GRF or receive a combination of GRF and USDA funds for SFMNP operations. The source of funding allocated to each AAA is included below.

Agency	Source of Funds		Guidance Category
	USDA	State GRF	
AAA1		X	2
AAA2		X	2
AAA3	X		1
AAA4	X		1
AAA5		X	2
AAA6	X		1
AAA7	X	X	2
AAA8	X		1
AAA9	X	X	2
AAA10A	X		1
AAA10B	X		1
AAA11	X		1

*Fostering sound public policy, research, and initiatives that benefit older Ohioans.*

## Category 1 Guidance

The following guidance is directed towards AAAs receiving USDA SFMNP funding.

- **Community Supported Agriculture (CSA) Programs**

A CSA is a program under which a farmer or group of farmers grows food for a group of shareholders (or subscribers) who pledge to buy a portion of the farmer's crop(s) for that season. The agency may purchase shares or subscribe to a CSA program on behalf of individual SFMNP participants.

In effort to maintain physical distancing of older adults, ODA recommends agencies consider incorporating CSA programs into SFMNP operations. CSA programs offer an alternative to shopping and interacting in-person at a traditional farmers' market and/or roadside stands. Produce may be distributed to a central location and/or delivered directly to a consumer's home. AAAs and/or SFMNP-contracted partners may consider implementing CSA produce delivery through home delivered meal providers or coordinated efforts with senior housing communities.

AAAs and/or SFMNP-contracted partners must limit the value of shared award to CSA programs to no more than 50 percent of their total SFMNP food grant.

- **Bulk Purchasing**

Bulk purchasing is a program model in which bulk quantities of certain produce items are purchased directly from authorized farmers by the agency and are then equitably divided among and distributed directly to eligible SFMNP participants, either at a central distribution point or through some type of home delivery network.

AAAs and/or SFMNP-contracted partners are encouraged to consider this as an option to purchasing produce in bulk and distributing to older adults at home. AAAs and/or contracted SFMNP-partners may use up to 100% of their food award towards bulk purchasing practices.

- **Traditional SFMNP Model**

AAAs and/or SFMNP-contracted partners may move forward with "traditional" methods of SFMNP operation, including participants shopping and interacting in-person at a farmers' market and/or roadside stand. In this circumstance, AAAs and/or SFMNP-contracted partners should delay program operations until at least July 2020 or until the Stay at Home Order is lifted.

AAAs and/or SFMNP-contracted partners are encouraged to connect with local farmers, farmers' markets, and the [Ohio Farmers' Market Network](#) to learn about how they are adapting operations to comply with public health official's guidance and requirements. Farmers market operators, farmers and food producers care deeply about the communities they serve. With added precautions, new procedures, and proactive steps, they are committed to continuing to serve the community by providing access to fresh, locally grown food. For more detail about resources and best practices of farmers' markets, visit [COVID-19 and Your Farmers' Markets](#).

AAAs and/or SFMNP-contracted partners may select one or more of the above program models to implement for SFMNP 2020. A combination of the above models is also permitted. For example, an agency may select to implement a CSA model May – July and the traditional program model August – November.

## Category 2 Guidance

The following guidance is directed towards AAAs receiving State GRF or a combination of USDA and State GRF SFMNP funding.

- **Community Supported Agriculture (CSA) Programs**

A CSA is a program under which a farmer or group of farmers grows food for a group of shareholders (or subscribers) who pledge to buy a portion of the farmer's crop(s) for that season. The agency may purchase shares or subscribe to a CSA program on behalf of individual SFMNP participants.

In effort to maintain physical distancing of older adults, ODA recommends agencies consider incorporating CSA programs into SFMNP operations. CSA programs offer an alternative to shopping and interacting in-person at a traditional farmers' market and/or roadside stands. Produce may be distributed to a central location and/or delivered directly to a consumer's home. AAAs and/or SFMNP-contracted partners may consider implementing CSA produce delivery through home delivered meal providers or coordinated efforts with senior housing communities.

AAAs and/or SFMNP-contracted partners may use up to 100 percent of food funds for CSA implementation. If the capacity is present, ODA recommends agencies consider implementing a full CSA model for SFMNP 2020.

- **Bulk Purchasing**

Bulk purchasing is a program model in which bulk quantities of certain produce items are purchased directly from authorized farmers by the agency, and are then equitably divided among and distributed directly to eligible SFMNP participants, either at a central distribution point or through some type of home delivery network

AAAs and/or SFMNP-contracted partners are encouraged to consider this as an option to purchasing produce in bulk and distributing to older adults at home. AAAs and/or contracted SFMNP-partners may use up to 100% of their food award towards bulk purchasing practices.

- **Traditional SFMNP Model**

AAAs and/or SFMNP-contracted partners may move forward with "traditional" methods of SFMNP operation, including participants shopping and interacting in-person at a farmers' market and/or roadside stand. In this circumstance, AAAs and/or SFMNP-contracted partners should delay program operations until at least July 2020 or until the Stay at Home Order is lifted.

AAAs and/or SFMNP-contracted partners are encouraged to connect with local farmers, farmers' markets, and the [Ohio Farmers' Market Network](#) to learn about how they are adapting operations to comply with public health official's guidance and requirements. Farmers market operators, farmers and food producers care deeply about the communities they serve. With added precautions, new procedures, and proactive steps, they are committed to continuing to serve the community by providing access to fresh, locally grown food. For more detail about resources and best practices of farmers' markets, visit [COVID-19 and Your Farmers' Markets](#)

- **Other Models**

With prior approval from ODA, AAAs and/or SFMNP-contracted partners may implement other "non-traditional" program models, including but not limited to mobile

markets. With State GRF, AAAs and/or SFMNP-contracted are permitted greater flexibility of SFMNP operations.

AAAs and/or SFMNP-contracted partners may select one or more of the above program models to implement for SFMNP 2020. A combination of the above models is also permitted. For example, an agency may select to implement a CSA model May – July and the traditional program model August – November.

### **SFMNP Participant Applications**

AAAs and/or SFMNP-contracted partners are encouraged to continue accepting participant applications for SFMNP 2020. Participant applications may be accepted online, over the phone, or through the mail. AAAs and/or SFMNP-contracted partners should limit in-person contact and avoid mass gathering events to apply for SFMNP benefits. Mass gatherings are defined as any event or convening that brings together 10 or more persons in a single room or single space at the same time.

#### **Participant Signature Requirement**

- The participant (and proxy) physical signature requirement on SFMNP applications has been suspended for Ohio SFMNP.
  - Participants and/or proxies completing paper-based, physical applications should complete and sign the application before submission.
  - For participant applications completed and **submitted online**, the participant and/or proxy can electronically “sign” their name.
  - For participant applications completed and **submitted over the phone**, the participant and/or proxy should also submit a text or email message confirming their eligibility.
- The participant application serves as a participant’s statement affirming that their household size and income does not exceed the maximum income eligibility for SFMNP 2020.

### **SFMNP Coupon Distribution**

AAAs and/or SFMNP-contracted partners should plan to distribute coupons through the mail. In accordance with the Stay at Home Order and in effort to maintain the practice of physical distancing, AAAs and/or SFMNP-contracted partners should limit in-person contact and mass gathering events for coupon distribution. Mass gatherings are defined as any event or convening that brings together 10 or more persons in a single room or single space at the same time.

- AAAs and/or SFMNP-contracted partners may delay coupon distribution until the Stay at Home Order is lifted. If the traditional SFMNP model is sustained, ODA recommends AAAs and/or SFMNP-contracted partners delay coupon distribution until at least July 2020.
- AAAs and/or SFMNP- contracted partners may select to suspend use of SFMNP coupons if a community supported agriculture (CSA) or bulk purchasing model is being implemented. In this circumstance, AAAs and/or SFMNP-contracted partners must establish a method to track benefits distributed to participants. Benefits may not exceed \$50/participant/SFMNP 2020.

### **SFMNP Printed Materials**

All AAAs and/or SFMNP-contracted partners have received physical copies of SFMNP participant applications, coupons, brochures and posters. In the event SFMNP applications and coupons remain unused, these should be disposed of following conclusion of SFMNP 2020. In accordance with the Ohio SFMNP Program Manual, any unused, pre-printed SFMNP coupons must be

shredded and disposed of properly. AAAs and/or SFMNP-contracted partners are encouraged to maintain unused brochures and posters, as these can be reserved for use in SFMNP 2021.

### **SFMNP Monitoring**

The AAA and/or SFMNP-contracted partner are responsible for the monitoring of farmers, farmers' markets, roadside stands, CSA programs, and bulk purchasing programs within their region. In accordance with CFR 249.10(e), monitoring includes developing a system for identifying high-risk farmers, farmers' markets, and roadside stands, and ensuring on-site monitoring, conducting further investigation, and sanctioning, if appropriate.

The AAA and/or SFMNP-contract partner must conduct on-site monitoring of at least 10 percent of farmers, 10 percent of farmers markets, 10 percent of roadside stands, and 10 percent of CSA programs or one of each program model, whichever is greater.

Even during the pandemic, on-site monitoring is required and must be completed to the best ability of the agency. AAAs are encouraged to follow [Responsible RestartOhio](#) protocols and recommendations when conducting on-site monitoring visits. The following resources may assist you in planning:

- [Ohio Department of Agriculture: COVID-19 and Farmers' Markets](#)
- [Responsible Restart Protocols](#)
- [Farmers Market Coalition - Market Resources](#)

In prior years, many AAAs and/or SFMNP-contracted partners have exceeded the 10 percent requirement. Amid the pandemic, ODA encourages agencies to reconsider monitoring strategies to ensure that at least the minimum requirement is met. It is not an expectation that agencies extend beyond the 10 percent requirement. Additional questions about on-site monitoring requirements should be directed to Carmen Clutter ([CClutter@age.ohio.gov](mailto:CClutter@age.ohio.gov)).

Amid COVID-19, ODA encourages AAAs and/or SFMNP-contracted partners to develop and implement a SFMNP plan of operation that continues to meet the needs of low-income older adults and support the local economy while keeping safety and health concerns a top priority. AAAs and/or SFMNP-contracted partners are required to clearly communicate the SFMNP 2020 plan of operations for their prospective region on/before **Friday, May 8, 2020** to Carmen Clutter ([CClutter@age.ohio.gov](mailto:CClutter@age.ohio.gov)). AAAs and/or SFMNP-contracted partners are expected to communicate unforeseen challenges or barriers to SFMNP implementation and any changes to their ODA approved SFMNP 2020 plan of operation.

## FREQUENTLY ASKED QUESTIONS

### 1. Q: Should we stop accepting SFMNP 2020 participant applications?

**A:** AAAs and/or SFMNP-contracted partners are encouraged to continue accepting participant applications for SFMNP 2020. Participant applications may be accepted online, over the phone, or through the mail. AAAs and/or SFMNP-contracted partners should limit in-person contact and avoid mass gathering events to apply for SFMNP benefits. Mass gatherings are defined as any event or convening that brings together 10 or more persons in a single room or single space at the same time.

### 2. Q: Should AAAs take applications now and not distribute coupons until July?

**A:** In response to COVID-19, Ohio SFMNP 2020 has expanded opportunities to incorporate alternative operation models, including community supported agriculture (CSA) programs and bulk distribution practices. AAAs and/or SFMNP-contracted partners should identify what program model(s) to implement, including how it will be operationalized. AAAs and/or SFMNP-contracted partners may determine the appropriate time to accept applications and distribute coupons based on the above guidelines.

If AAAs and/or SFMNP-contracted partners have begun accepting applications, they are encouraged to continue doing so. ODA encourages AAAs and/or SFMNP-contracted partners to distribute coupons through the mail. In accordance with the Stay at Home Order and in effort to maintain the practice of physical distancing, AAAs and/or SFMNP-contracted partners should limit in-person contact and mass gathering events for coupon distribution. Mass gatherings are defined as any event or convening that brings together 10 or more persons in a single room or single space at the same time.

AAAs and/or SFMNP-contracted partners may delay coupon distribution until the Stay at Home Order is lifted. If the traditional SFMNP model is sustained, ODA recommends AAAs and/or SFMNP-contracted partners delay coupon distribution until at least July 2020.

AAAs and/or SFMNP-contracted partners may select to suspend use of SFMNP coupons if a community supported agriculture (CSA) or bulk purchasing model is being implemented. In this circumstance, AAAs and/or SFMNP-contracted partners must establish a method to track benefits distributed to participants.

### 3. Q: Should we cancel SFMNP farmer/market manager training?

**A:** The agency must ensure that training is conducted prior to the startup of the first SFMNP participation of an individual farmer/market manager. The training must be **interactive** and may be delivered in a variety of methods, including telephone and video conferencing and web-based training modules. Interactive training does not need to be delivered in-person.

### 4. Q: Has the COVID-19 pandemic altered SFMNP funding?

**A:** Notice of Grant Awards (NGAs) for USDA funded SFMNP have been distributed to AAAs. NGAs for second allocation of USDA funds are forthcoming. NGAs in support of the State (GRF) SFMNP for **traditional SFMNP** have been distributed to AAAs. With ODA's continually evolving COVID-19 response, funds allocated for the implementation of **non-traditional** pilot projects (*Producing Healthy Seniors*) **are not being released at this time.**

**5. Q: When will AAAs receive notice of additional State GRF awards for Non-Traditional (*Producing Healthy Seniors*) program models?**

**A:** With ODA's continually evolving COVID-19 response, funds allocated for the implementation of **non-traditional** pilot projects (*Producing Healthy Seniors*) **are not being released at this time**. State of Ohio fiscal teams are reviewing budgets of all State Agencies currently. ODA will provide updates as they are made available.

**6. Q: Are the 100% GRF supported AAAs also limited to \$50 per participant?**

**A:** State GRF present more flexibility than USDA funds, including increasing the benefit level per participant. However, it is important to keep in mind that if the benefit level is increased, less participants will be able to participate your program.

For the USDA funded programs, the Code of Federal Regulation (CFR) limits the benefit level per participant to no more than \$50/SFMNP season. ODA encourages AAAs and/or SFMNP-contracted partners to maintain this benefit level.

**7. Q: Are CSA and bulk purchasing model participants required to get \$50 worth of produce for the season?**

**A:** For USDA funded programs, Ohio SFMNP 2020 State Plan includes a participant benefit level of \$50 per participant each program year. No matter the program model—traditional, community supported agriculture (CSA) programs and/or bulk distribution, the benefit level per participant should be equal to \$50. AAAs and/or SFMNP-contracted partners may use a combination of models, however the total value of SFMNP benefits may not exceed \$50/participant.

State GRF present more flexibility than USDA funds, including increasing the benefit level per participant. However, it is important to keep in mind that if the benefit level is increased, less participants will be able to participate your program.

**8. Q: Will there be additional funding to cover things such as postage, etc.?**

**A:** SFMNP 2020 was the first program year ODA covered the printing and shipping costs of SFMNP coupons and materials, including participant applications, brochures, and posters. As ODA incurred these administrative costs, it is assumed that AAAs and/or SFMNP-contracted partners have SFMNP administrative funds available to cover costs associated with mailed distribution.

**9. Q: Given the current situation, how should AAAs distribute SFMNP coupons?**

**A:** AAAs and/or SFMNP-contracted partners should plan to distribute coupons through the mail. In accordance with the Stay at Home Order and in effort to maintain the practice of physical distancing, AAAs and/or SFMNP-contracted partners should limit in-person contact and mass gathering events for coupon distribution. Mass gatherings are defined as any event or convening that brings together 10 or more persons in a single room or single space at the same time.

AAAs and/or SFMNP-contracted partners may delay coupon distribution until the Stay at Home Order is lifted. If the traditional SFMNP model is sustained, ODA recommends AAAs and/or SFMNP-contracted partners delay coupon distribution until at least July 2020.

AAAs and/or SFMNP-contracted partners may select to suspend use of SFMNP coupons if a community supported agriculture (CSA) or bulk purchasing model is being implemented. In this circumstance, AAAs and/or SFMNP-contracted partners must establish a method to track benefits distributed to participants. For USDA funded programs, benefits may not exceed \$50/participant/SFMNP 2020.

**10. Q: How do AAAs distribute SFMNP coupons on a first come/first serve basis with this new method?**

**A:** AAAs are encouraged to develop a process for tracking participant applications in the order in which they are received. It is best practice to process, and approve, applications first received.

**11. Q: What about AAAs/SFMNP contracted-partners that use coupons with a mid-season expiration date? How should AAAs handle/distribute coupons that have an expiration date of July or August if the program is delayed until July?**

**A:** ODA encourages AAAs and/or SFMNP-contracted partners to consider strategies that allow coupons with early expiration dates to still be used. AAAs and/or SFMNP-contracted partners may select to extend the expiration date of all distributed coupons to October/November 2020 by communicating this intent to participants, farmers, and market managers, alike. For smaller programs, AAAs and/or SFMNP-contracted may consider altering the expiration date of these coupons by placing a printed label over the July/August expiration date.

AAAs and/or SFMNP-contracted partners are encouraged to collaborate with ODA's SFMNP team ([CClutter@age.ohio.gov](mailto:CClutter@age.ohio.gov) / [ADavis@age.ohio.gov](mailto:ADavis@age.ohio.gov)) to determine the best approach for using coupons that expire mid-season.

As a reminder, SFMNP coupons must be distributed to all participants by September 30, 2020. Coupons must be used by participants no later than November 30, 2020, or an earlier date determined by the AAAs and/or SFMNP-contracted partner.

**12. Q: Should we avoid mass distribution events at all or just wait until July, assuming the Stay at Home order has been lifted by then?**

**A:** AAAs and/or SFMNP-contracted partners should plan to distribute coupons through the mail. In accordance with the Stay at Home Order and in effort to maintain the practice of physical distancing, AAAs and/or SFMNP-contracted partners should limit in-person contact and mass gathering events for coupon distribution. Mass gatherings are defined as any event or convening that brings together 10 or more persons in a single room or single space at the same time.

Once the Stay at Home Order has been lifted, AAAs and/or SFMNP-contracted partners may consider in-person distribution at that time, however this may not occur before July 2020. It is important to consider that once the Stay at Home Order is lifted, the recommendation for older adults to practice physical distancing may remain in place.

**13. Q: Would AAAs be allowed to let participants know that due to the COVID 19 pandemic, coupons will not be mailed out until July??**

**A:** In response to COVID-19, Ohio SFMNP 2020 has expanded opportunities to incorporate alternative operation models, including community supported agriculture (CSA) programs and bulk distribution practices. AAAs and/or SFMNP-contracted partners should identify what program model(s) to implement and how it will be operationalized, including determining how this will be communicated to participants.

**14. Q: Can the AAA develop a way to track SFMNP benefits without the use of coupons?**

**A:** AAAs and/or SFMNP-contracted partners should identify what program model(s) to implement and how it will be operationalized, including how benefit use will be tracked. ODA encourages AAAs and/or SFMNP-contracted partners to use SFMNP coupons when at all possible.

Traditional models require the use of SFMNP coupons. Alternative models, including community supported agriculture (CSA) programs and bulk purchasing practices may not necessitate the use of coupons. In this circumstance, AAAs and/or SFMNP-contracted partners must establish a

method to track benefits distributed to participants. This process must be reviewed and approved by ODA. Programs funded by USDA support may not exceed a benefit level of \$50/participant/SFMNP 2020.

**15. Q: What if our region does not have options for alternative models (CSAs, mobile markets, etc.)?**

**A:** AAAs and/or SFMNP-contracted partners are encouraged to connect with ODA's SFMNP team ([CClutter@age.ohio.gov](mailto:CClutter@age.ohio.gov) / [ADavis@age.ohio.gov](mailto:ADavis@age.ohio.gov)) to discuss plans for a successful SFMNP 2020 season. In this circumstance, AAAs and/or SFMNP-contracted partners may maintain the traditional program model (seniors shopping at farmers' markets and roadside stands), but delay this practice until at least July 2020. ODA encourages AAAs and/or SFMNP-contracted partners to connect with farmers' markets to become familiar with how markets are preparing to serve consumers amid COVID-19. Currently, the Ohio Farmers' Market Network (OFMN) is exploring opportunities to permit online and up-front purchasing and "curb-side" produce pickups. Farmers and farmers' markets who traditionally do not operate CSAs may be willing to set up alternative arrangements due to the unique nature of the season.

AAAs and/or SFMNP-contracted partners are encouraged to consider bulk purchasing options. Bulk purchasing may include purchasing produce directly from a local farmer(s) and distributing to seniors via packaged/boxed produce boxes.

**16. Q: With a CSA model to purchase the shares, is that something that can be done up front with the farmer or after the season distribution? Is the farmer paid after the fact or paid up front to supply produce to seniors?**

**A:** AAAs and/or SFMNP-contracted partners are responsible to determine contractual obligations between the agency and the farmer, which may include payment or a portion of payment at the start of the CSA season. In a typical CSA program, payment is provided "up-front". However, an agency and farmer may agree to an alternative payment process.

**17. Q: Is there a limit to the amount of SFMNP food funds that can be used to implement a bulk purchasing program?**

**A:** No, there is no limit. AAAs and/or SFMNP-contracted partners may use up to 100% of food funds to implement a bulk purchasing model. The value of benefits received by each participant may not exceed \$50/season.

**18. Q: Can SFMNP coupons be used online to purchase eligible foods?**

**A:** For AAAs receiving USDA funds, SFMNP coupons **must** be transacted at the farmers' market or roadside stands. If the service is offered, authorized farmers and farmers' markets may implement online ordering for SFMNP participants, however the transaction of payment with SFMNP coupon must be done in-person, at produce pickup.

**19. Q: Will ODA be able to carry over any unspent funds for SFMNP 2020 to SFMNP 2021?**

**A:** No. All unused SFMNP 2020 funds must be returned to USDA FNS by February 1, 2021. All returned funds by the USDA is then reallocated to all programs for SFMNP 2021.

**20. Q: Will Ohio receive special consideration for USDA SFMNP 2021 funding for large amounts of SFMNP funds returned at the end of SFMNP 2020?**

**A:** No. The USDA SFMNP funding formula does not into account expenditures or use of grant funds when allocating base grants. Provided that sufficient SFMNP funds are available, each State agency that participated in the SFMNP in any prior fiscal year, will receive not less than the amount of funds the State agency received in the most recent fiscal year in which it received funding (see 7 CFR 249.14(b)).

**21. Q: Is pandemic unemployment assistance (PUA) counted as income when determining income eligibility of participants?**

A: While the CARES Act stimulus checks are not considered income, pandemic unemployment assistance (PUA) is considered income and should be accounted for when determining income eligibility for SFMNP participation.

**22. Q: How should we track and report the SFMNP in WellSky?**

A: The following parameters should be used when reporting in WellSky:

- Contract Required - No
- Service Name – Senior Farmers’ Market Nutrition Program
- Consumer Type – Consumer
- NAPIS Service – NAPIS Other
- Fund ID – Senior Community Services and 12 other identifiers
- Service Program – Senior Farmers Market Nutrition Program
- Service Category – AAA-Defined Services
- Unit Type – 1 Coupon
- Subservice – None

**23. Q: How should we track and report the SFMNP CSA program in WellSky?**

A: The following parameters should be used when reporting in WellSky:

- Contract Required - No
- Service Name – SFMNP CSA Box
- Consumer Type – Consumer
- NAPIS Service – NAPIS Other
- Fund ID – Rural Development Housing Program (USDA) or Senior Community Services
- Service Program – Senior Farmers Market Nutrition Program
- Service Category – Ohio-Defined Services
- Unit Type – 1 Item
- Subservice – None