SECTION 3: CLIENT MANAGEMENT
Qualifying Eligible Clients

This policy applies to tribal contractors and tribal subcontractors that use EFAP funds for a voucher program.

1. WSDA defines eligible client.
   - Eligible clients are persons who are not able to purchase enough food for their subsistence.
   - This is the minimum eligibility standard required by the state.

2. Can create additional client eligibility standards.
   - Contractors and subcontractors must apply these additional standards to all clients, without prejudice.
   - These standards apply to volunteers and employees of the contractor and subcontractor. Employees and volunteers meeting the same eligibility requirements for services shall be given the same opportunity to receive services and shall be treated the same as other clients.

3. Service areas.
   - Providers must serve clients, no matter where the client resides.
     - The same level of service should be provided to all clients regardless of where they reside.
     - If appropriate, the provider may refer the client to the agency typically servicing the area in which the client resides, or the tribe that has established jurisdiction over the area where the individual lives.

4. Data collection.
   - Data collected for EFAP includes:
     - Household size
     - Ages of all members of the client’s household
     - Is this a new or returning client (returning clients should be counted as new on the first visit of each one-year period)
   - Documentation should not be required to verify eligibility or assist in your data collection practices. This includes pieces of mail, school records, or medical records. Under no circumstances should a pantry require a client’s social security number, proof of citizenship, proof of income, proof of address, or proof of household size.
   - We recommend taking every step to guarantee that all people receive food without ID or documentation. If other funders require additional data collection outside of WSDA programs which encourage or require verifying client information through documentation, then please work with those organizations to clarify the data they need and understand why this is required, with the goal of shifting policy towards acceptance of self-attestation of information.
   - WSDA actively seeks to reduce client access barriers across all programs and invites our partner hunger relief organizations to do the same.
Written Client Confidentiality Standards

This policy applies to all tribal contractors, and tribal subcontractors that use EFAP funds for a voucher program.

1. **Must have written client confidentiality standards.**
   
   All providers must respect the privacy of clients. Personal information collected, used or acquired in connection with providing emergency food services must be used only for the purpose of those programs.
   
   - **Personal information** includes any information that identifies an individual’s health, education, business, use or receipt of governmental services, names, addresses, age, telephone numbers, social security numbers, driver’s license numbers and finances including financial profiles, credit card numbers or other identifying numbers.
   
   - Contractors and subcontractors with direct client contact must have written client confidentiality policies on file.
     
     - Prior to receiving services or reimbursement, subcontractors must have on file with the contractor copies of their client confidentiality policies.
   
   - One cannot release, divulge, publish, transfer, sell or otherwise make known to unauthorized persons the personal information without express written consent of the client or as provided by law.
   
   - Providers who make referrals for clients must have a copy of the client release form on file with the contractor.
   
   - Written consent from the client shall include what client information can be shared and to whom or which agencies/businesses.
   
   - Providers agree to implement physical, electronic and managerial safeguards to prevent unauthorized access to personal information.

2. **Monitoring by WSDA of personal information collected.**

   - WSDA reserves the right to monitor, audit or investigate the use of personal information collected, used or acquired by the contractor. Not properly maintaining clients’ private information could result in termination of contract or subcontract.
   
   - Contractor shall agree to indemnify and hold harmless WSDA for any damages related to the contractor’s unauthorized use of personal information.
   
   - Contractor shall monitor the use of personal information collected by subcontractors.
   
   - Subcontractors shall agree to indemnify and hold harmless the contractor for any damages related to the subcontractor’s unauthorized use of personal information.
Performing Outreach and Networking Activities

This policy applies to tribal contractors and tribal subcontractors that use EFAP funds for a voucher program.

1. **Conduct outreach activities to clients.**
   All contractors and subcontractors providing direct services shall provide the following outreach activities:
   - A tribe must register within 30 days of the effective start date of its contract.
   - To register, a tribe can call 211 in its area or register online at wa211.org.
   - A tribe must prominently display the 211 number for the benefit of its customers.
   - Posting information on EFAP voucher services (including how to apply for voucher services) in public locations, at tribal and government offices, hotlines, advocacy and community social service organizations as funding allows. This information could include the following:
     - Handouts or pamphlets that lists the services and locations.
     - Pamphlets from each agency providing the above services that clients can take home with them.

2. **Contractors will network and provide information on available services to clients and other providers.**
   Contractors and subcontractors will coordinate services with other advocacy and community services organizations. “Coordinate services with” is defined as making contact with these programs, sharing information about programs, such as brochures or listing contact information, and establishing procedures for referring clients between food pantries and the other services. Such programs in your community could include:
   - Supplemental Nutrition Assistance Programs (SNAP).
   - Food Distribution Program on Indian Reservations (FDPIR).
   - School breakfast, lunch and summer feeding programs.
   - Women's advocacy organizations.
   - Rental Assistance programs.
   - Senior centers.
   - Area Agencies on Aging.
   - Organizations and associations for people with disabilities.
   - Rescue missions and emergency shelters.
   - Churches and religious organizations, such as the Salvation Army, St. Vincent DePaul.
   - Local Department of Social and Health Services programs.
   - Urban Leagues.
   - Multi-cultural organizations.
   - Drug and alcohol treatment programs.
   - Local job training programs and local employment security offices.
   - Public transportation facilities.
3. **Contractors are responsible for subcontractors having referral information.**

   Contractors and subcontractors will disseminate information to clients. Such information can include handouts, pamphlets, or a list of services clients can take home with them about programs. Contractors are responsible for ensuring subcontractors have referral information. At a minimum this information must list other social services available to clients, such as:
   - Local Basic Food and cash assistance programs.
   - Emergency housing, rental assistance and low-income housing.
   - Job training programs including the closest employment security office.
   - Child care assistance.
   - School breakfast, lunch and summer feeding programs.
   - Drug and alcohol treatment programs.
   - Public transportation and other transportation assistance.
   - Additional services that will help clients gain greater self-sufficiency.
   - Energy assistance.
   - Senior services.
   - Services for people with handicaps.
   - Assistance for victims of crime and domestic violence.