



March 04, 2021

Mr. Bruce Summers  
Administrator, Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250

Dear Administrator Summers:

Throughout the course of the Coronavirus Food Assistance Box Program (CFAP), the Oklahoma Food Banks (Regional Food Bank of Oklahoma and Community Food Bank of Eastern Oklahoma), Cherokee Nation and the Arkansas Foodbank have experienced many successes as well as multiple challenges. We write to share what has worked, concerns with vendors and recommendations to improve the experience with the CFAP program.

Shortly following the onset of the pandemic, food banks lost an essential resource - volunteers. Most food banks rely on volunteer labor to supplement and assist with daily operation, specifically they are essential to food and box packaging production. The CFAP program helped fill the volunteer labor gap through providing pre-packed boxes, ready to be distributed to the growing number of Oklahomans facing food insecurity.

The pandemic's impact on economic conditions led to an increased need for food assistance. Long lines overwhelmed many food pantries that partner with the Oklahoma and Arkansas food banks. Many continue to experience about a 30% increase in clients served. First time clients (those that have never been to a food pantry) hover at around 15%. Food banks were faced with meeting the demand with depleted resources. Food donations were drastically affected by the high consumer demand and donations have yet to return to pre-pandemic levels. Large annual food drives that contribute hundreds of thousands of pounds of shelf-stable food, were canceled. The CFAP Box Program was a godsend and remains critical in helping food banks meet the sustained surge in demand. It has, however, also come with significant challenges that we believe are possible to resolve.

This collaborative letter from three Feeding America food banks as well as the largest federally recognized Indian tribe in the United States serves every county in Oklahoma as well as 33 counties in Arkansas is in hopes to help identify some inherent issues mass feeding organizations have faced with the Farmers to Families program and provide some recommendations to improve on this vital food box support.

The food banks have well developed networks in each county. These networks when utilized worked extremely well. However, many times these networks were overlooked and underutilized as vendors decided to provide their food directly to organizations that do not usually participate in feeding efforts and who do not have the capacity to handle the amount of food being provided. As a result, many communities are either underserved or oversaturated. We often received phone calls to come pick up product that was left out all day on a parking lot or we were contacted with questions concerning how to get the boxes at all.

The food banks are viewed as the experts in feeding people facing hunger in our communities and we are well trained in safe food handling. It has been very difficult to help people access the food when we have not been included in the distribution of that product. In essence, our expertise has often gone unutilized.

For the Cherokee Nation, its emergency food distribution efforts began last March – serving over 112,000 citizens with the equivalent of 7.1 million meals. Although some of its food was purchased with tribal dollars, it has had great success distributing CFAP boxes. Cherokee Nation’s food security response is one of the key components of its COVID-19 relief efforts.

### **Uncertainty of continuance**

Inconsistent messaging on whether CFAP will continue makes planning difficult. We rarely have reliable information on when or if there will be an extension of the program. We’ve experienced limited communication from USDA regarding what should be expected from one phase to the next phase. Following the previous period, we heard there may be another phase coming and refrained from ordering product to fill the void. The result was a significant gap of fresh product available to food bank networks during January. Clear communication of the intentions and timing of the program is needed to make advanced adjustments for filling voids in food inventory.

### **Constant guideline changes within phases**

Throughout the five iterations of CFAP, food banks experienced constant change from one period to the next. One continual change has been the type of box/boxes we can receive. The first phase worked well because it provided various box options including, protein, dairy, fluid milk, produce and combo of these products. This permitted food banks to order product according to demand and storage capacity. Since then, options are now limited to only combo boxes, thus creating capacity challenges for many food banks and pantries.

Additionally, the lack of clear continuity of program availability has left us juggling our food acquisition needs to wait and see what the CFAP program might provide. As food banks we are masters at managing large quantities of food and managing the distribution of that food direct to clients in local communities. It is increasingly difficult to manage however when the food types and availability change drastically in a short period of time. This leaves us with gaps in our food supply and hungry people unserved.

The changes in approved vendors by county has also led to a lot of confusion. With large feeding organizations that span over many counties, it became another hurdle in trying to equitably provide for our networks. The Cherokee Nation, for example, faced constraints in where it could serve CFAP after the first phase. Its reservation spans 14 counties across northeast Oklahoma. During the first phases, the tribe could serve all of its counties. Unfortunately, due to USDA’s changing rules, the Cherokee Nation was no longer able to serve its entire reservation in later phases because the vendor became county-specific and awards were not made to entire states. With its cold storage based in Cherokee County, where the tribe is headquartered, the Cherokee Nation could not receive food from vendors assigned to other counties. For an Indian tribe, it makes little sense to serve only a portion of its tribal citizens.

## **Continual changes of approved vendor(s)**

The most challenging issue is the continual change in approved vendors we can work with. Some periods provided nonprofits a variety of vendor options to partner with while others have been limited to one vendor, like the current period. While we have each worked diligently to build relationship with the various awarded vendors of each phase, this takes a tremendous amount of time and energy both from the vendor and the food bank. As one would expect, not all vendors have the same level of customer service and experience in this type of distribution, thus we have built many great partnerships throughout the program as well as experienced poor working relationships with several approved vendors.

Each period changes and just when we seem to start to operating smoothly, the rules or who we are working with changes again. We spend time each period to work with newly approved vendors to help them with their applications and distribution processes, but most of the time resulted in wasted time and effort. Although we are thankful for the Farmers to Families Food Boxes that we have received so far and appreciate any help to ensure that we can continue connecting those in need to such a valuable resource. We would also like to work together to make program improvements that can assure efficiency and equity in distribution at the local level.

The food banks collectively want to recognize DiMare Fresh, Proffer Foods, Natco Foods and RK Group as great examples of CFAP vendors. They provided outstanding customer service and provided open lines of communication throughout the process. They were well organized and provided all the product requested in a timely and equitable manner.

Additionally, DiMare Fresh is the only vendor that has provided the Regional Food Bank of Oklahoma with last mile reimbursement for any of the CFAP periods. The “last mile” has been a point of misunderstanding for most vendors and has largely been bypassed. This is another area that further clarification and expectations of vendors would be helpful.

Although these partnerships worked well, the bids for those vendors were not renewed for this latest phase. Currently, GoFresh is the only approved vendor for both the states of Oklahoma and Arkansas, and since this transition there has been little to no transparency in where the boxes are going and we are unable to direct clients of local partners to the boxes for access. The communication has been lacking, and at times totally absent. These types of drastic shifts in logistics and partnerships with no explanation or discussion are the core of the difficulties with the program.

## **Disastrous CFAP Experience with GoFresh Tulsa, dba Tulsa Fruit Company**

The Oklahoma Food Banks, Cherokee Nation and Arkansas Foodbank have all faced difficult challenges with GoFresh ranging from poor customer service, inadequate distributions and poor food quality. In this phase of CFAP, GoFresh is the only approved vendor for these nonprofits and the Cherokee Nation.

The Oklahoma Food Banks attempted to work with GoFresh through the first period and received substandard service. The product both food banks received did not match product that was ordered. Shipments did not arrive as scheduled and would often arrive at unscheduled times days later, severely affecting distribution schedules for both food banks. Pallets were often not secured to industry standards and, as a result, boxes arrived damaged. Numerous attempts to reach GoFresh were left unanswered. GoFresh required scheduling the week prior, which made planning difficult manifested by the vendor’s inability to deliver when scheduled.

During prior periods, GoFresh partnered with local organizations like churches and pantries executing pop-up food distributions. The pop-up distributions were not coordinated with local food banks. While pop-up distributions are a great way to force out a lot of food, they are not ideal for serving food insecure communities. As a result, many communities are either underserved or oversaturated. CFAP partnerships with local organizations who have little to no experience or the facility to safely store and distribute food has led to waste and spoilage. Often following pop-up distributions, food banks receive phone calls asking if we can come pick up excess CFAP boxes left outside all day which is a major food safety concern.

The communication failures add another layer of frustration to food banks ability to work with GoFresh. The organizations do not have a point of contact, and all inquiries are through a generic email account, [foodbox@gofreshusa.com](mailto:foodbox@gofreshusa.com). For instance, the Regional Food Bank requested 10 trucks per week to meet their service area needs. They received an initial email reply with no follow up. Finally, after requesting an update, the Regional Food Bank received an email stating that GoFresh had shipment dates for the Regional Food Bank and would confirm in a few hours. The Regional Food Bank did not receive further reply despite multiple emails and phone calls to GoFresh. Finally, after several weeks of requests, the Regional Food Bank was offered two trucks for the entire phase. For context, the Regional Food Bank of Oklahoma serves 53 of 77 counties in Oklahoma and during previous CFAP phases distributed over 5,000 CFAP boxes per week throughout its service area. GoFresh's offering of 2,000 boxes for the month to distribute throughout a 48,000-square-mile service area is grossly inadequate and inhibits Regional Food Bank's ability to serve needed CFAP product. The Community Food Bank continues to call and email GoFresh to place orders for this phase and yet GoFresh ignores its attempts to make contact.

The Arkansas Foodbank is also experiencing challenges and disappointments while attempting to work with them. After communicating the demand of 10 or more truckloads a week, communication from GoFresh completely dropped off. They continued to call and email in hopes of receiving some boxes and finally received an email stating that they had too many requests and that the food bank would not be receiving any boxes. After another contact we have been told we would receive a truck load the week of the 16<sup>th</sup>, and since then the relationship is improving with regular shipments.

The Cherokee Nation is working to help meet the food security needs of those living on its 7,000-square-mile reservation in northeast Oklahoma. GoFresh has also presented continual challenges for them, which has led to fewer tribal citizens receiving the food they so desperately need right now. Securing trucks has been extraordinary difficult, and rife with last-minute changes that curtailed the Cherokee Nation's ability to distribute food at planned drive-thru distributions. When the Cherokee Nation secured trucks from GoFresh, they frequently received truckloads of moldy, subpar and sometimes entirely inedible produce. Until it began receiving food through a different vendor during Phase 4, the Cherokee Nation never received any boxes with protein. Furthermore, the Cherokee Nation frequently received milk that was set to expire within a few days. For those already experiencing the stressors of a pandemic, loss of wages and food insecurity, receiving rotten produce and nearly expired milk from a federal program intended to help those in need created yet an additional hardship. When the Cherokee Nation repeatedly raised these concerns with GoFresh, it was met with flippant and dismissive comments. Despite concerns raised, no changes were made.

## Recommendations

Based on the successes and challenges we have faced with the CFAP program, we offer the following recommendations to USDA to ensure that the program remains beneficial throughout this unprecedented time:

- **Open the process** to include multiple vendors to work with Food Banks and Tribal Nations.
- **Monitor vendors to ensure compliance with USDA regulations** and ensure quality standards are met.
- **Create clarification and vendor expectations around last mile reimbursements** for the organizations who are receiving and distributing the food boxes to the public.
- **Ensure any USDA food purchases are distributed equitably nationwide;** and consider whether nonprofits in less financially supported communities are able to accept the food.
- **Distribute the boxes through TEFAP agencies,** food banks, Indian Tribal Governments, schools and others with expertise in food distribution, cold storage capacity and other equipment needed to safely distribute food.
- **Deliver boxes directly to food banks and provide reimbursement from USDA** to food banks for the last mile distribution costs instead of relying on contractors to do so.
- **Determine a means of ensuring food banks and Indian Tribal Governments receive an appropriate share of food boxes** for their communities. Food banks are experts in food insecurity and food safety and are well suited to probably receive and equitably distribute food in their service areas. Tribes are best equipped to serve their own tribal citizens.
- **Remove county-specific vendors and regulations** and instead, award contracts in ways that account for organizations that cover multiple counties and sometimes, multiple states.
- **Create a better and more efficient method of working with food banks and Indian Tribal Governments** directly to meet their food security needs through CFAP.

We are happy to provide any further detail and information needed. We believe wholeheartedly that we can continue to have a productive and mutually beneficial partnership. Thank you for your time and attentiveness to improving the CFAP program.



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