

II. FISCAL SECTION

300. Allowable and Unallowable Costs

301 General Information

The Allowable/Unallowable Chart listed in Section 302 below may change every year based on annual USDA Guidance. CPNS will notify *Network* Contractors of all updates through Program Letters and on the CPNS website. **USDA rules for allowable and unallowable costs apply to State and Federal Share.** All activities and materials must be reasonable (in cost and scope) and necessary and targeted to FSNE-eligible persons.

FSNE-eligible persons are defined as persons who are participating in the Food Stamp Program, those who are likely eligible for participation in the Food Stamp Program because their income does not exceed 130 percent of Federal Poverty Level (FPL), or those who are potentially eligible because their incomes do not exceed 185 percent of the FPL.

FSNE activities may be delivered with a waiver to potentially eligible target audience with at least 50 percent having household incomes not higher than 185 percent of the FPL. (Waiver to USDA will be completed by CPNS staff). Activities in school districts or organizations working with schools must have over 50 percent of the students enrolled in the free or reduced price school meal program at each participating school site to qualify. College students must be at 130 percent of FPL and meet at least one other USDA criterion (See page 10).

If there are changes in the *Food Stamp Nutrition Education Plan Guidance* for any given FFY that impact the Allowable and Unallowable Costs, the *Network* will update the website with a revised Allowable and Unallowable Costs document. Note: You will be required to comply with the new FFY USDA Guidance document once issued. You will be notified by email if changes occur.

302 Chart of USDA Allowable and Unallowable Costs Chart

1. Equipment
2. Food Demonstrations
3. Food Stamp Promotion and Food Stamp Outreach
4. Gardening
5. Literature/Materials/Audiovisuals
6. Media Activities
7. Medical Equipment and Health Services
8. Research, Evaluation and Needs Assessments
9. Nutrition Education Events/Classes
10. Nutrition Education Materials
11. Physical Activity Promotion
12. Systems, Policy and Environmental Education (Consumer Empowerment)
13. Profits/Revenues/Fund Raising/Grant Writing
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15. Social Marketing
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19. FSNE-Eligible Costs per Participant
20. Personnel

**ALLOWABLE AND UNALLOWABLE COSTS
BASED ON USDA GUIDANCE FFY 2008**

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
1. Equipment	
<ul style="list-style-type: none"> ▪ Purchase of office or electronic equipment (such as computers TV, VCR, cameras, etc). A public organization may donate equipment and use fair market value; however, any fair market value must be adjusted to reflect equipment provided by federal funding. (Multiplying the fair market value times the percentage share invested in the equipment may factor this value.) ▪ All equipment must be reasonable (in cost and scope), necessary, and integral to the nutrition education activity. If the equipment is also being used to support other activities, or not being used by 100% FTE staff, the costs must be prorated. ▪ Equipment purchased with Federal Share funds may be returned to the State at the request of the <i>Network</i> if the project is terminated or the Contractor no longer participates in the <i>Network</i>. ▪ Only one salad bar per contract is allowed for educators to use for nutrition education. ▪ Purchase of one mobile food demonstration cart per contractor for nutrition education. ▪ Kitchen appliances and storage equipment only with justification of reasonable and necessary need. 	<ul style="list-style-type: none"> ▪ Electronic or office equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from the <i>Network</i>. ▪ Purchasing food service equipment for food service use. ▪ Medical equipment, including breast pumps. ▪ Cell Phones (unless contractor can meet criterion). ▪ Video cameras ▪ Global Positioning Systems (GPS) systems and/or devices ▪ Walkie talkies and/or handheld two-way radios
2. Food Demonstrations	
<ul style="list-style-type: none"> ▪ Cost of food for recipe/taste testing purposes that promotes healthy eating (especially fruits and vegetables). Cost of kitchen equipment and dishes necessary for food storage, preparation, and demonstration purposes. ▪ Equipment costs must be prorated to reflect the FSNE portion only if other programs or projects use the equipment. ▪ Cost for food <u>samples</u> associated with a nutrition education lesson. A recommended guideline for taste testing samples is \$2.50/person, including supply costs. In 	<ul style="list-style-type: none"> ▪ Ongoing snack or food service. ▪ Meal size portions or complete meal service, including “training table meals”. (<u>Portions sizes must be limited to taste test sample sizes, and cannot be snacks, partial meals, or complete meal service.</u>) ▪ The purchase of water for food demonstrations is unallowable, unless approved by the <i>Network</i>. ▪ Cost of food provided as groceries or supplemental food. ▪ Distributing or providing meals or snacks to FSNE-eligible persons for attendance of

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<p>some cases a slightly higher cost per person may be justified.</p> <ul style="list-style-type: none"> ▪ Staff time to prepare, transport, serve and clean-up food for demonstration and/or taste testing purposes. ▪ Food may be donated, but the actual cost may not be leveraged or claimed on any FSNE budget. 	<p>nutrition education classes or events.</p> <ul style="list-style-type: none"> ▪ Use of staff time to prepare or serve meals or develop food or produce displays. Snacks, meals, or the use of food/fruit for decoration or display purposes.
3. Food Stamp Promotion and Food Stamp Outreach	
<ul style="list-style-type: none"> ▪ A brief message about the Food Stamp Program must be provided on all newly developed or reprinted materials. The following is recommended: “The Food Stamp Program provides nutrition assistance to people with low incomes. It can help you buy nutritious foods for a better diet. To find out more, contact [enter your local office or toll-free number, or other useful information to help identify how to get services].” ▪ USDA asks that all nutrition education efforts include a <i>brief</i> promotional Food Stamp Program (FSP) outreach message <u>within the context</u> of nutrition education. ▪ Activities that provide more than a brief promotion message may be funded through the State’s FSP Outreach Plan or through regular FSP administrative funding. ▪ Within the context of a nutrition education intervention, staff may promote ideas for improving access to healthier foods in low-income communities, but may not use FSNE funds to actively increase food security. ▪ Within the context of nutrition education interventions, staff may distribute Food Stamp Outreach materials such as brochures and posters to promote the Food Stamp Program. 	<ul style="list-style-type: none"> ▪ Any activity or set of activities in which the primary objective is to increase participation in the Food Stamp Program through individual applicant assistance, community-based outreach message dissemination, or facilitation of systemic changes in Food Stamp Program that enhance program accessibility (Outreach). <i>Examples of unallowable outreach activities include:</i> ▪ Pre-screening or assisting individuals with completing Food Stamp Program applications and obtaining verification; ▪ Accompanying individuals to the Food Stamp Program office to assist with the application process; ▪ Conducting outreach workshops for members of community organizations that serve low-income people; ▪ Convening meetings that focus exclusively or primarily on Food Stamp Program Outreach and increasing Food Stamp Program participation; ▪ Reimbursing the mileage for outreach training or meeting attendance; ▪ Producing print materials (e.g. brochures, posters) that are primarily Food Stamp Program outreach in nature; ▪ Developing and placing print, radio or television media advertisements to be used as public service announcements to educate potential applicants about Food Stamp Program; ▪ Designing a Food Stamp Program Outreach program, including the development, publication, and distribution of materials to the community; ▪ Building Food Stamp Program promotion/outreach teams, steering

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
	<p>committees, coalitions, etc. and providing Food Stamp Program outreach guidance to other State and local organizations;</p> <ul style="list-style-type: none"> ▪ Working with local agencies to plan and implement Food Stamp Program Outreach and Program; ▪ Accessing strategies, as well as monitoring and/or evaluating agencies' outreach performance; ▪ Funding State or local staff to develop, implement, or oversee Food Stamp Program Outreach activities; ▪ Costs for the following are neither reimbursable through Food Stamp Program promotion nor Food Stamp Program Outreach: <ul style="list-style-type: none"> - Implementing "Direct Certification" of Food Stamp Program households for other programs. - Outreach and recruitment for non-Food Stamp programs (e.g. School Breakfast Program, National School Lunch Program or WIC). - Implementing environmental or systematic changes and strategies, in which the primary objective is to increase participation in a non-FOOD STAMP program. ▪ States may not use FSNE funds for local community food security and needs assessments, except where such an activity is of minimal or no cost and is integral to general FSNE nutrition education program planning. ▪ FSNE funds may not be used to actively promote and conduct outreach for the FSP, the National School Lunch Program, the School Breakfast Program, and other Food and Nutrition Services programs. Brief messages identifying these as sources of food assistance are allowable.
4. Gardening	
<ul style="list-style-type: none"> ▪ Educational supplies, curricula and staff salaries to teach gardening concepts as part of nutrition education efforts that reinforce the beneficial nutrition aspects of gardening. 	<ul style="list-style-type: none"> ▪ The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies. ▪ Costs associated with creating, implementing, and maintaining gardens.

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
5. Literature/Materials/Audiovisuals	
<ul style="list-style-type: none"> ▪ The purchase of FNS nutrition education/promotion materials that address FSNE topics for use with FSNE-eligible persons. ▪ The purchase of other nutrition education materials when there are no FNS materials available that address FSNE topics and will be used with FSNE-eligible persons. ▪ The production of nutrition education materials, for which there <u>is no other existing comparable material</u>, which support the State's goals and objectives for FSNE and will be distributed to FSNE-eligible persons. It is encouraged that States collaborate with other FNS programs on the messages conveyed and the costs of education materials. The State agency must describe the method used for allocating costs between the programs. <ul style="list-style-type: none"> - Prior to production, materials must be justified, reviewed and approved by <i>Network</i> staff and contain appropriate USDA acknowledgements. ▪ Fact sheets, brochures, newsletters, and calendars, etc. that are produced for distribution to FSNE-eligible persons and similar persons about nutrition topics such as food choices, food budgeting and food preparation. <ul style="list-style-type: none"> - Harvest of the Month (HOTM) menu slicks should be prorated at 60%. Please note that this percentage holds as long as the HOTM menu slicks templates are not edited (i.e. no modifications to the nutrition education content). Non-HOTM menu slicks should be prorated based on the amount of nutrition education. ▪ Videos and websites, developed for use by FSNE-eligible persons, about nutrition education and related topics. Timeframe for redevelopment and reproduction is limited to once every other year. More frequent 	<ul style="list-style-type: none"> ▪ Any nutrition education literature paid for by another federal or private program or source. ▪ Any material that endorses or promotes brand name products or retail stores. ▪ Paying for manufacturer's or store (cents off) coupons. ▪ Influencing a store's pricing policy. ▪ Materials that do not give attribution to the FSP. ▪ Any audiovisual paid-in-full by a private third party or source and any audiovisual that endorses or promotes brand name products or retail stores. ▪ Negative written, visual or verbal expressions about specific foods, beverages, or commodities. ▪ DVD/video development and production for one-time demonstrations.

<p>updates requires justification.</p> <ul style="list-style-type: none"> ▪ Materials targeted to intermediaries who deliver services to FSNE-eligible persons. 	
<p>6. Media Activities</p>	
<ul style="list-style-type: none"> • Paid or public service radio and television commercials or advertisements promoting healthy eating directed toward FSNE-eligible persons within the community. • Local media activities, including media advertisements, must be coordinated with and complementary to State media activities. • Contractors must provide a justification as to why local media activities are reasonable and necessary and provide the target audience income data that qualify the activities for FSNE funding. Paid media costs and activities must target FSNE-eligible persons in qualified census tracts, use outlets where over half of the audience meet FSNE eligibility criterion, or use outlets approved by USDA. • Public relations activities including media appearances, interviews, preparation of press releases and press kits, training of spokespersons, announcements publicizing community events, or resources for FSNE-eligible persons. ▪ Development of media materials, including public service or paid advertisements, requires prior approval from CPNS staff and the USDA WRO and must display appropriate acknowledgements. 	<ul style="list-style-type: none"> • Media activities to promote or present nutritional messages to the general public, which are not targeted to the FSNE-eligible population. • Creating media activities that make derogatory statements about a particular food, beverage, or commodity. • Developing media advertisements to promote participation in programs other than Food Stamps.
<p>7. Medical Equipment and Health Services</p>	
<ul style="list-style-type: none"> ▪ Salaries and benefits of personnel to collect dietary intake data based on a 24-hour recall, food frequency questionnaires, or other assessment of nutrition knowledge and behaviors. ▪ Health promotion activities and interventions aimed at primary prevention of disease (prevent or postpone the onset of chronic disease) and designed to help FSNE-eligible persons establish and maintain active lifestyles and healthy eating habits. ▪ USDA will reimburse staff only at compensation rates representative of the work they conduct with FSNE rather than 	<ul style="list-style-type: none"> ▪ Medical equipment or health services related to health assessment of recipients; obtaining data on nutritional status, chronic disease, or chronic disease risk assessments. This includes obesity prevention and/or weight management programs which are billable to MediCal or other medical insurance. ▪ Costs associated with the measurement of height, weight, skin fold thickness, blood pressure, cholesterol, blood-glucose and iron levels. ▪ Clinical health screenings (i.e., cholesterol testing, body mass index and blood glucose testing, etc).

<p>their regular rate for their job. (e.g. practicing law or medicine).</p> <ul style="list-style-type: none"> ▪ The allowability of the use of health care facilities in the delivery of FSNE hinges on whether the organization is public or private. The organization status as “profit” or “non-profit” status is not relevant. FNS has determined that unless an absolute need is demonstrated (i.e., no other FSNE provider is available) participation by non-governmental (private) health care organization is not reasonable or necessary and should be discouraged. See page 56 of the Food Stamp Nutrition Education Guidance Plan, at http://www.nal.usda.gov/foodstamp/NationalFSNE.html. Health Care Facilities should work with Program Manager to determine if this policy will impact their Network Contract. 	<ul style="list-style-type: none"> ▪ Dental hygiene activities, including instruction on proper brushing and flossing ▪ Medical equipment (e.g., scales, sphygmomanometer, skinfold calipers, glucometer, breast pumps). ▪ Secondary prevention interventions and Medical Nutrition Therapy. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. Medical Nutrition Therapy involves the assessment of nutritional status and the assignment of diet, counseling, and/or specialized nutrition therapies to treat an individual’s illness or condition; it is conducted in association with a prescription from a qualified professional as a physician or nurse practitioner. ▪ Salaries of health professionals such as physicians, nurses, pharmacists, dentists charged at their regular rate for their job (e.g., practicing medicine, law, database coordinator, etc.) rather than compensated at rates representative of the work they conducted with FSNE. If salaries appear to be exceptionally high given the described job duties and relative to the salaries noted for other FSNE projects, the contractor will be required to submit a justification to the contract manager prior to the approval of the position.
<p>8. Research, Evaluation and Needs Assessments</p>	
<ul style="list-style-type: none"> ▪ Consumer and intermediary/market research and pilot testing of interventions for FSNE-eligible persons. ▪ <i>Network</i>-approved consultant services for research and evaluation expertise linked to FSNE. ▪ Conducting focus groups as an essential part of developing and testing targeted nutrition messages for the FSNE-eligible audience. Expenses (e.g., meals, child care, and transportation) that are considered necessary and reasonable for services provided as a focus group participant. ▪ Intercept surveys, key informant interviews, record audits, and community surveys of 	<ul style="list-style-type: none"> ▪ Payment to subjects for their participation in research/evaluation studies. ▪ Research that does not target FSNE-eligible persons. ▪ Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely FSNE eligible respondents (persons with incomes less than or equal to 130% of poverty guidelines/thresholds, with certain exceptions). ▪ Local community food security and needs assessments, except where such an activity is of minimal or no cost and is integral to general FSNE nutrition education program planning. ▪ Use of “Changing the Scene” and the “School

<p>FSNE activities.</p> <ul style="list-style-type: none"> ▪ Telephone or mail surveys and the purchase of questions for surveys of FSNE-eligible persons. ▪ Formative research for program planning and process, impact, and outcome evaluations of FSNE interventions. ▪ Funding for all surveillance/surveying activities must be pro-rated to reflect only the percentage of respondents at <u>130% of poverty or less</u> unless the surveillance/survey activity is directed to FSNE-eligible persons only. ▪ Local agency evaluation projects should focus on evaluating FSNE activities and assessing the effectiveness of FSNE interventions in improving dietary habits. ▪ Assessments of consumer needs and access to healthy foods as an integral part of program planning to increase the effectiveness of FSNE interventions and strategies. The costs, however, must be minimal, reasonable and limited to the scope of the FSNE activities. 	<p>Health Index” with FSNE funds is unallowable based on these resources focusing on policy and environmental change.</p> <ul style="list-style-type: none"> ▪ Incentive payments to encourage attendance at focus groups. ▪ Costs associated with developing nutrition education standards for grade, school, or district-wide levels. For this to be pursued, FSNE should not be the sole contributor; instead costs should be shared with other participating schools or districts. If all school participants are not FSNE-eligible, costs should be prorated.
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9. Nutrition Education Events/Classes

<ul style="list-style-type: none"> ▪ Participation in nutrition education activities/events does not require pro-rating of costs if your organization can demonstrate that at least 50% of the participants meet the 185% FPL targeting requirement. If this cannot be demonstrated, costs associated with the event must be prorated to the percent of the community that is at or below 130% FPL. ▪ Structured, interactive educational and promotional events in community, cafeteria, and classroom settings. Associated costs of salaries, space, equipment and materials for education of FSNE-eligible persons on nutrition related topics (e.g., food budgeting, preparation, safety). If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. Schools must be public government entities for State Share charges. ▪ The <i>pro rata</i> share of costs of classes that 	<ul style="list-style-type: none"> ▪ Classes that are designed to provide case management or "life skills" training (e.g., parenting, child development, crisis management, rental information). Only that portion of the class related to nutrition education is allowable. ▪ Medical Nutrition Therapy and secondary prevention interventions. ▪ Breastfeeding education, promotion, and support that duplicates or otherwise is provided by other funding sources such as WIC. ▪ Physical activity/exercise classes, equipment or facilities. ▪ Weight loss classes, individualized meal plans, obesity treatment programs, etc. ▪ Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.). ▪ Incentive payments to encourage attendance at nutrition education classes. ▪ Personal costs for recipients to attend nutrition
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are provided to targeted groups in conjunction with another program (e.g., WIC), provided the local agency provides the interagency agreement that exists between the programs and the method for allocating costs between the programs.

- All activities that address the topic of breastfeeding must be planned and implemented in collaboration with WIC through an MOU. Breastfeeding activities must supplement and not supplant existing WIC activities.
- Promotion or marketing of the nutrition benefits of a Salad Bar Program.
- Where operating in conjunction with existing programs, activities should enhance and/or supplement, not supplant them. For example, the cost for a home economics teacher to conduct an extracurricular cooking club for low-income teenagers could be allowable, while using FSNE funds to replace costs of routine nutrition school classes would constitute inappropriate supplanting of ongoing school curricula.
- Local FSNE contractors wanting to implement a mini-grant program must first get CPNS approval. (Mini-grant projects awarded by local FSNE contractors must be reviewed and approved by USDA prior to funding being allocated to any mini-grant project). Mini-grant projects must submit the following to CPNS for review and submission to USDA: (1) description of the project, (2) targeting data, and (3) budget justification.
- Activities where the primary objectives pertain to allowable nutrition education but brief FSP outreach messages are also shared with FSNE participants. FSP information materials are available to download on the FNS web site at: <http://www.fns.usda.gov/fns>.

education activities such as childcare and transportation services.

- Personnel costs for staff to monitor students' food selections or other such activities within the realm of school food service (such as food service workers only encouraging fruit and vegetable intake in cafeteria, as opposed to a more curriculum-based cafeteria intervention).
- Education for incarcerated or institutionalized persons who are not eligible for the Food Stamp Program (i.e. persons in jails, prisons, nursing homes, mental institutions, etc.).
- Most able-bodied students ages 18 through 49 who are enrolled in college or other institutions of higher education at least half time are not eligible for the Food Stamp Program and therefore not eligible (130% of FPL) to receive FSNE. However, students may be qualified for food stamp benefits if otherwise income-eligible and they can meet one of the criteria listed below:
 - Receive public assistance benefits under Title IV-A Program; or
 - Take part in a State- or Federally-financed work study program; or
 - Work at least 20 hours a week; or
 - Are taking care of a dependent household member under the age of 6; or are taking care of a dependent household members over age 5, but under age 12 and do not have adequate child care to enable them to attend school and work a minimum of 20 hours, or to take part in a State or Federally financed work study program; or
 - Are assigned to or placed in a college or certain other schools through:
 - A program under the Workforce Investment Act of 1998; or
 - A program under Section 236 of the Trade Act of 1974; or
 - An employment and training program under the Food Stamp Act, or
 - An employment and training program operated by State or local government.
 - Also, a single parent enrolled full time in college and taking care of a dependent household member under the age of 12 can get food stamps if otherwise eligible.

10. Nutrition Education Materials

- Nutrition education materials designed for physical activity promotion must be provided in conjunction with relevant nutrition and physical activity messages (e.g., Frisbee, jump rope, visor).
- Expenditures on nutrition education materials must have prior California Department of Public Health approval and must comply with all State and Federal safety requirements with respect to production including Prop 65 requirements for lead content.

11. Physical Activity Promotion

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| <ul style="list-style-type: none"> ▪ Physical activity (PA) promotion as a component of broader nutrition activities such as providing FSNE-eligible persons and similar low-income persons with information and encouragement to exercise. This may include 1) promotion of PA messages/PA recommendations contained in the current <i>Dietary Guidelines for Americans</i>, 2) PA demonstrations (instructional in nature, on a <u>one-time basis for clients or staff</u>), 3) provision of technical assistance and 4) community resource information (such as free or low-cost local fitness events) in order to encourage program participants to engage in regular PA.

 Note: For PA demonstrations at <i>Network</i>-funded school districts, the <i>Network</i> and USDA have negotiated a pre-approved contract with SPARK (Sport, Play and Active Recreation) to conduct one-time demonstrations. If a school district is using FSNE funds to conduct a SPARK one-time demonstration, they must use the pre-approved contract for services and costs. School districts may use other vendors to conduct one-time demonstrations. ▪ FSNE staff may use FSNE funds to promote PA in the context of nutrition education, but they may not use FSNE funds to develop stand-alone PA materials or projects. ▪ Purchase/development of educational materials promoting PA and integrating PA into nutrition education for FSNE-eligible persons. All newly developed materials must have <i>Network</i> approval before final | <ul style="list-style-type: none"> ▪ Ongoing exercise or PA classes,(e.g., yoga classes, walking clubs, sports teams, running classes, gym classes). ▪ The implementation of PA environmental interventions, (i.e., PA community assessments, walkability workshops, development of community plans to improve walkability, and the implementation of any environmental improvements to increase neighborhood walkability). ▪ Costs incurred for health club or gym memberships, dues, equipment, (e.g., bicycles, treadmills, stair steps, weights, etc.), facilities (rental or modifications) or exercise leaders for ongoing exercise classes. ▪ Personnel costs for conducting or maintaining exercise or PA classes. (Exception: one-time PA demonstration). ▪ PA supplies for class participants are not allowable except for instructor demonstrations. ▪ The purchase of water for physical activity promotion is unallowable, unless approved by the <i>Network</i>. ▪ PA promotional materials developed with FSNE funds without CPNS Staff prior approval. |
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<p>production. USDA prefers the utilization of existing materials when possible.</p> <ul style="list-style-type: none"> ▪ Walk to School events that are part of a larger nutrition education campaign. Allowable activities for Walk to School include collaborating with school partners to promote the Walk to School Day event and/or participating (but not leading) the event. <i>Network</i>-funded staff should work with partners to ensure that nutrition education and nutrition-related activities are included in the Walk to School event. ▪ PA education and promotion as part of nutrition education sessions in the Food Stamp Program. ▪ Information on local sites where FSNE-eligible and other low-income persons can access a diverse range of low or no-cost activities appropriate for different ages and physical abilities. ▪ Physical activity bulletin boards or displays around the food stamp offices, clinics or community. ▪ Referral to library or web site resources on physical activity. ▪ Development and provision of information and resource lists to target audiences. ▪ A certified physical fitness professional should be consulted throughout the development phases of materials that contain PA content. The cost of such consultation is allowable if it is reasonable and necessary. ▪ Purchase of educational materials that promote PA for FSNE eligibles. Examples of educational materials include brochures, newsletters, posters, public service announcements, audiotapes, videotapes, and DVDs. These materials may be purchased or obtained free from reliable sources such as government organizations, PA associations, or other authorities on the subject. ▪ Nominal value physical activity items can be purchased as FSNE supplies. Allowable items would be of nominal value to meet the reasonable and necessary test. 	
12. Systems, Policy and Environmental Education (Consumer Empowerment)	
<ul style="list-style-type: none"> ▪ FSNE funds may be used to promote, but not implement, systems, environmental, or policy 	<ul style="list-style-type: none"> ▪ Any activity or material to lobby or influence Federal, State, or local officials to pass or sign

<p>change, if and only if such promotion is directly linked to, supportive of, and proportionate to direct nutrition education efforts for FSNE clients. FSNE staff may encourage FSNE-eligible persons to pursue positive nutrition systems, environment, and policy changes, and provide them with a list of strategies to assist with this effort (community empowerment).</p> <ul style="list-style-type: none"> ▪ Systems, policy and environmental change may be included in projects if the activities are supportive and proportionate to direct nutrition education activities. ▪ <i>Network Contractors</i> are allowed to participate but not lead the development or implementation of school wellness committees or school health councils for that segment of the community who are FSNE eligible. 	<p>legislation or to influence the outcomes of an election, referendum, or initiative.</p> <ul style="list-style-type: none"> ▪ Organized efforts to influence elected officials and lobby for legislative/policy changes. ▪ Costs associated with the establishment and maintenance of environmental or policy changes in the community, such as staffing, infrastructure, equipment, space, land, construction or supplies. ▪ FSNE funds may not be used for implementation of initiatives and other resources which have the primary purpose of improving nutrition systems, environments, or policies. Examples of materials that promote systems and environmental changes that are inappropriate for FSNE include <i>Changing the Scene</i>, <i>Healthier US School Challenge</i>, and the <i>School Health Index</i>.
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13. Profits/Revenues/Fund Raising/Grant Writing

<ul style="list-style-type: none"> ▪ Sale of publications/nutrition education materials produced with FSNE funds. Publications/materials must be sold <u>at cost</u> (cost includes concept development, production, and distribution). ▪ Any sales received by Contractor must be accounted for in a separate, identifiable account, reported to the State on the SF-269 form, and used to meet agreed upon and allowable programmatic needs of the Contractor, or the sale proceeds must be returned to the State. ▪ Attendance at trainings on sustainability. 	<ul style="list-style-type: none"> ▪ Sale of publication/materials produced with USDA dollars to make a profit without prior approval from CPNS and USDA. ▪ Costs of organized fund raising/grant writing including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions, regardless of the purpose for which the funds will be used.
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14. Space Allocations

<ul style="list-style-type: none"> ▪ Space allocated for nutrition education programs in which the plan for the space/cost allocation is documented and actual out-of-pocket costs are incurred and tracked. ▪ Space donated by local school districts, but only the cost of space based on depreciation or use allowance. ▪ Space must be prorated by FTE when staff person is not dedicating 100% FTE to the 	<ul style="list-style-type: none"> ▪ State Share charges for space that is donated by a private third party or <u>public entity</u>, or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs). For publicly owned space, amounts claimed under “rent” must represent actual costs of ownership and/or maintenance for the property, NOT the “fair market value” if the space was rented on the open market. For example, if a county or
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<p><i>Network</i> contract.</p>	<p>school district donated space to a program to use in the conduct of eligible nutrition education, and the county or school district was not incurring any ownership or maintenance costs for that space, no “fair market value” may be assigned to that space for the purposes of determining State Share contributions.</p> <ul style="list-style-type: none"> ▪ Commercial rental rates may not be used for publicly owned space.
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15. Social Marketing

<ul style="list-style-type: none"> ▪ Local radio and television announcements of nutrition education events for FSNE-eligible persons. (See #6, MEDIA). ▪ Appropriate social marketing campaigns that target nutrition messages to FSNE-eligible person audiences and are delivered, with an approved exclusivity waiver, in areas/venues where at least 50 percent of persons have incomes, equal to or less than 185% FPL. Prior approval is required from CPNS and USDA. 	<ul style="list-style-type: none"> ▪ Social marketing campaigns that target the general population. In some instances, prorated costs based upon numbers of likely FSNE-eligible persons ($\leq 130\%$ of poverty) guidelines/threshold, with certain exceptions, that will be reached with the campaign may be allowed. ▪ Nutrition education messages that convey negative message or disparage specific foods, beverages, or commodity, or which are not consistent with the 2005 Dietary Guidelines for Americans and My Pyramid. ▪ TV and radio announcements/advertisements that do not include a brief message about the FSP, its benefits, and how to contact the Food Stamp office.
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16. Staff Training, Conferences, and Other Costs

<ul style="list-style-type: none"> ▪ Training (including travel expenses) for staff and contractors providing nutrition education to FSNE-eligible persons. Attendance must be justified in terms of the benefits to implementing the contract Scope of Work. Prior written authorization is required from the CPNS <i>Network</i> staff for any new training/travel not already listed on the approved budget. ▪ Travel costs associated with <i>Network</i> business or to a <i>Network</i>-sponsored training or event will be 100% reimbursed even if the person is not 100% FTE. However, if the conference is not <i>Network</i>-sponsored, travel costs must be prorated based on FTE and for the portion of the conference or training that qualifies as nutrition education. ▪ Participation in regional or state coalitions such as <i>Network</i> Regional Collaboratives and 	<ul style="list-style-type: none"> ▪ Travel outside the State of California without prior written authorization from the CPNS <i>Network</i> staff. Attendance must be justified and travel request approved. ▪ No more than four FSNE staff (including <i>Network</i>, DSS and UCD state and local agencies) are allowed to travel for national-level conference, meeting or training, even when occurring in the State. Attendance must be justified and have prior USDA approval. ▪ Costs for clerical, administrative staff, and other staff not providing direct services to the FSNE eligible population to attend conferences. ▪ University level courses on technical or clinical subjects that are not relevant to the practical delivery of nutrition education to the target audience. ▪ Costs of training materials that have not been reviewed/approved for use in FSNE.
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<p>NSC Action Teams on FSNE business.</p> <ul style="list-style-type: none"> ▪ Nutrition education training materials. ▪ FSNE-related training for program delivery staff (e.g., <i>Children's Power Play! Campaign</i>, <i>Harvest of the Month</i>, <i>Community Health Leaders</i>, <i>Latino Campaign</i>). ▪ The time volunteers of a public agency spend performing FSNE-specific duties. Time must be commensurate with the duties being performed. (This does not apply to nonprofit organizations). ▪ FSNE support or partial sponsorship of meetings, conferences and summits must be pro-rated based on both the proportion of the target audience that represents FSNE-eligible stakeholders and the proportion of the agenda related to nutrition for low-income audiences. ▪ FSNE funds may be used to provide general briefings and trainings to community health professionals, if the State can demonstrate that such professionals serve a majority of FSNE eligibles. ▪ Funds spent on training, workshops, meetings, and summits should target FSNE eligibles or intermediaries working with FSNE eligibles. The primary focus must be nutrition education/healthy eating behaviors. A secondary focus (e.g, food shopping practices, safe handling, promoting healthy communities, etc.) may be included. ▪ Cost of institutional memberships in business, technical, and professional organizations. These costs must be consistent with the effort to promote the provision of quality nutrition services to FSNE-eligible persons. ▪ Nutrition education activities that promote the selection of healthy foods from vending machines. ▪ Contractors may prorate hotel wireless fees by FTE, conference content, and FSNE-specific usage. Contractors should first utilize their daily incidental allowance towards these costs. 	<ul style="list-style-type: none"> ▪ Money, vouchers or passes provided to FSNE recipients in conjunction with FSNE activities. ▪ Childcare or transportation services provided for FSNE recipients in conjunction with FSNE activities. ▪ Substitute teachers costs for <i>Network</i>-funded teachers while they are at <i>Network</i> or nutrition education trainings. ▪ Stipends to teachers for attending trainings outside of classroom hours is unallowable. Use of substitutes is approved for teachers to attend trainings that are already scheduled and CPNS approved through the end of the school year. This includes SHAPE meetings. ▪ Training or professional development costs of food service workers or others not directly associated with delivery of FSNE (e.g., Serve Safe Training). ▪ Costs to support travel and other costs associated with the <i>Network's</i> participation in national committee meetings. (This condition applies to national committee meetings for which USDA representation and participation are established at the federal level). ▪ Subscriptions and/or memberships to non-FSNE-related affiliations. These include, but are not limited to: <ul style="list-style-type: none"> - Individual memberships in business, technical and professional organizations (e.g. ADA, Society for Nutrition Education, national and state WIC Associations, Center for Nonprofit Management). - Local newspapers, magazines, and journals. - Costco, Sam's Club, or other retail, discount, or wholesale stores.
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17. INCOME QUALIFICATIONS

<ul style="list-style-type: none"> ▪ Each intervention site must have specific income qualifying targeting data submitted for 	
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<p>state and federal share.</p> <ul style="list-style-type: none"> ▪ Flea Market, farmers' markets, festivals, health fairs and other community events should be located in qualifying census tracts whenever possible or contractor should prorate based on % of people in the area at 130% FPL (GIS can be used) Also, if available, survey data from the event may be used to qualify the site . ▪ Participation in nutrition education activities/ events does not require pro-rating of costs if your organization can demonstrate that at least 50% of the participants meet the 185% FPL targeting requirements. 	
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18. Retail, Restaurant and Worksites

<ul style="list-style-type: none"> ▪ FSNE services in partnership with restaurants may use FSNE funds to do so only in restaurants that are both authorized to accept food stamps and located in geographic areas meeting the FSNE targeting criteria (e.g., at least 50% of their clients have gross incomes at or below 185% FPL). ▪ Restaurant sites may participate in FSNE by serving as intervention sites if these sites can demonstrate that at least 50% of their clients have gross incomes at or below 185% FPL. If such sites redeem food stamps, this would be further proof of the efficacy of these locations as venues for FSNE. ▪ Worksite interventions (nutrition education) where you can verify that at least 50% of the employees are at or below 185% of FPL. This can be done by the census tract data of the site itself, proprietary data from the employer if available, or means testing. ▪ <i>Regional Networks (RN)</i> must provide retail interventions in qualifying census tracts or stores redeeming over \$50,000 on Food Stamps monthly. Retail interventions include comprehensive merchandising and promotional activities in supermarkets, small chain stores and independent (neighborhood) markets statewide in an effort to increase the purchase of fruits and vegetables among FSNE-eligible Californians. The merchandising components of the program include customized point-of-purchase 	<ul style="list-style-type: none"> ▪ Partnerships with restaurants not accepting food stamps and not meeting the targeting criteria of 50% or more of the audience is at or below 185% FPL. ▪ Retail site interventions not targeted to FSNE-eligible shoppers. ▪ Worksites interventions not targeted to FSNE-eligible workers. ▪ Hosting retail interventions in sites that do not meet the qualifying criteria. ▪ <i>African American Campaign, Latino campaign</i> and <i>Core 1</i> may <u>not</u> merchandise or host food demonstrations in the same stores.
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<p>materials, in-store recipe booklets and recipe cards. Food demonstrations, store tours, and retail-sponsored community events are conducted to support the merchandising efforts as well.</p> <ul style="list-style-type: none"> ▪ The <i>Children's Power Play! Campaign</i> may host food demonstrations in those stores that are recruited and maintained by <i>African American Campaign, Latino campaign</i> and Core 1. However, Food demos may <u>not</u> be held jointly and should be scheduled on different days and times to reinforce the <i>Power Play!</i> message at the point of purchase. ▪ As documented in the SOW, RNs should work with LIAs. This may also include LIA crossover into the retail arena. RNs and LIAs may host food demos in the same qualifying stores. However, food demos may <u>not</u> be held jointly and should be scheduled on different days and times to reinforce the message at the point of purchase and increase the reach of interventions. 	
19. FSNE Eligibility Cost per Participant	
<ul style="list-style-type: none"> ▪ Costs per FSNE eligible participant, on average, range between \$60-\$300. Contractors that propose spending significantly more than this average must provide justification. 	
20. Personnel	
<ul style="list-style-type: none"> ▪ The USDA recommends using a \$45 per hour salary rate (\$94,400 yearly salary) for school teachers and a \$54 hourly rate (\$112,000 yearly salary) for school administrators as a maximum State and Federal Share salary rate. Using this methodology, contractors may elect to utilize lower salary rates for teachers/school administrators up to this maximum salary rate. For any contractor wishing to exceed the maximum salary rate, a justification would be required and will be considered on a case-by-case basis. The maximum rates do not include fringe benefit costs. ▪ Staff time spent planning, delivering and evaluating nutrition education to FSNE-eligible persons. Time must be charged at a rate commensurate with duties being 	<ul style="list-style-type: none"> ▪ A physician's time spent distributing nutrition flyers at health fairs when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing. ▪ The time volunteers of a non-public agency (e.g., faith-based organizations, food banks, etc.) spend performing FSNE-specific duties. ▪ Costs to support dietetic interns/students if their experience will meet academic or fieldwork requirements. ▪ Costs to support staff time or other expenditures related to participating in national-level work or committees, except where the activity is an integral part of FNS' focus on general FSNE program planning. However, in general, costs associated with national-level committee work are not reasonable and

<p>performed.</p> <ul style="list-style-type: none"> ▪ Time contribution of food service staff for FSNE should not exceed 20%. Contractors should provide justification for time contributions exceeding this percentage. ▪ The time interns/students spend on FSNE activities only if they are (a) <u>unpaid</u> or (b) not using the internship placement to fulfill academic or fieldwork requirements. Paid interns/students meeting criterion (b) must track their FSNE time using weekly time logs, semi-annual certification statements, or if applicable, as part of an approved time study. ▪ Since they are not traditional positions acting as nutrition educators, the use of non-traditional positions (e.g. school psychologists, warehouse workers) as FSNE State or Federal Share requires justification and an explanation of their role in FSNE activities. ▪ In lieu of signing each time and effort sheet individually after review and approval, time and effort sheets can be certified in bulk and transmitted electronically (up to 20 sheets per transmittal with a supervisor's electronic signature.) 	<p>necessary for the delivery of FSNE in States. USDA, FNS staff represents FSNE interests on national committees.</p> <ul style="list-style-type: none"> ▪ Contractors cannot claim a donated service or a good as an in-kind if it is not allowable, reasonable, or necessary for delivery of FSNE. Although public schools are considered a governmental agency, the cost of student's time to get high school credit hours by volunteering with FSNE activities is not an allowable in-kind charge to FSNE. Although the Food Stamp Program (FSP) does not have an official definition of what constitutes an adult, for work registration purposes it is generally at age 18. Therefore, the minimum age for FSNE volunteer is 18 years of age. ▪ The use of electronic signatures only pertains to supervisory approval of weekly time logs and/or quarterly time studies. Electronic signatures are not allowed for the individual contributing time to FSNE.
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