



United States Department of Agriculture
Food and Nutrition Service

Western Region

Reply to Attn of: Administrative Notice 05-28 September 21, 2005 FS-2-GEN

Subject: Food Stamp Nutrition Education Policy Clarifications

To: Western Region Food Stamp Program State Directors
Western Region Food Stamp Nutrition Education State Agency Contacts
Western Region Food Stamp Nutrition Education State Coordinators

This is to provide States with clarification we have recently received regarding several Food Stamp Nutrition Education (FSNE) policy issues that were raised during review of Federal Fiscal Year 2005 and 2006 State FSNE Plans. As always, Food and Nutrition Service's (FNS) FSNE State Plan Guidance, issued annually, remains the primary document from which States may find information with regard to FSNE program and fiscal policies.

- (1) 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.
- (2) FNS asks that all nutrition education efforts include a *brief* Food Stamp Program (FSP) outreach message. 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.
- (3) 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 FNS programs. Brief messages identifying these as sources of food assistance are allowable.
- (4) Retail and 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% of poverty guidelines. If such sites redeem food stamps, this would be further proof of the efficacy of these locations as venues for FSNE.
- (5) FSNE funds may not 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 necessary for the delivery of FSNE in States. USDA, FNS staff represent FSNE interest on national committees.

- (6) FSNE staff may use FSNE funds to promote physical activity in the context of nutrition education, but may not use FSNE funds to develop stand-alone physical activity materials or projects.
- (7) 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. Although there may be some minor relevant purposes that are mutually shared between TN and FSNE in the *Changing the Scene* kit, its key purpose is for local use in promoting systems and environmental changes, the costs of which are to be born locally. Use of FSNE funds for this purpose is inappropriate. Examples of materials that promote systems and environmental changes that are inappropriate for FSNE include *Changing the Scene*, the *Healthier US School Challenge*, and the *School Health Index*.
- (8) FSNE funds may not pay for staff to participate in the development or implementation of school wellness policies. This is the case even if the State's Child Nutrition Program has taken the lead and this is a component of a State's Nutrition Action Plan.
- (9) FSNE funds may be used to *promote*, but not implement, systems, environmental, or policy 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 clients to pursue positive nutrition systems, environment, and policy changes, and provide them with a list of strategies to assist with this effort
- (10) Within the context of a nutrition education intervention, FSNE 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.
- (11) 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 FSP eligibles.
- (12) 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 FSP eligibles and the proportion of the agenda related to nutrition for low-income audiences.
- (13) "Mini-grant" programs awarded by State or local FSNE contractors cannot be approved if the information for each grantee is not provided with the annual State Plan submission.

State FSP Agencies are wholly responsible for ensuring that State and local FSNE partners are aware of and comply with the aforementioned clarifications, in addition to all other FSNE policies outlined in the annual State Plan Guidance.

A handwritten signature in black ink, appearing to read "D. H. Bailey". The signature is stylized with a large initial "D" and "H" and a long, sweeping underline.

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