Food Stamp Nutrition Education Plan Guidance

US Department of
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Food and Nutrition
Service
Food Stamp Program

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United States Department of Agriculture

Food and Nutrition Service

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Alexandria, VA 22302-1500

Dear State Cooperators:

We are pleased to present to you the State Food Stamp Nutrition Education (FSNE) Plan Guidance. Beginning with this release of the Guidance, we will no longer release the FSNE Guidance annually. FSNE policy updates will be communicated through policy memorandums that will be accessible to States on the Food Stamp Nutrition Connection Web site and the Food Stamp PartnerWeb. In this way, FSNE guidance will be disseminated in the same way as other Food Stamp policy: as policy updates are required, they will be issued with effective dates. We encourage you to review the Guidance document carefully before drafting your State FSNE Plan. Regional Food and Nutrition Service (FNS) staff are available to provide technical assistance to State agencies on the preparation of State FSNE plans and reports. State agencies are responsible for ensuring that sub-grantees follow this Guidance and implement approved activities accordingly.

The FSNE Guidance was identified as a significant "Guidance Document" in accordance with Executive Order 13422 and the Office of Management and Budget's bulletin on Good Guidance. For the first time since the Food Stamp Program's inception of the FSNE Guidance, the USDA Office of Budget and Program Analysis (OBPA) and the Office of Management and Budget (OMB) comprehensively reviewed the document. The new Guidance includes templates that have been approved by OMB for States' use to help ensure an expeditious review process.

In FY 2008, we kicked off a three year pilot allowing certain States to submit multi-year plans. The goal of this pilot is to test whether multi-year plans may improve and facilitate long term planning for nutrition education goals and to explore the potential for this approach to reduce the burden of developing, approving and clearing the plans while maintaining the fiscal integrity of the program. At the conclusion of the three-year pilot phase or at a selected point during this period, FNS will determine whether the multi-year plan concept may effectively be extended to other State agencies.

We would like to emphasize that FSNE is enhanced when the specific roles and responsibilities of local, State, regional and national food stamp agencies and nutrition education providers are clearly defined and put into practice. To that end, we encourage the coordination of opportunities between food stamp outreach and FSNE efforts, as appropriate and available. You are reminded, however, that outreach activities as a part of an approved FSNE plan are only allowable when they supplement and complement the nutrition education being provided and are not the primary activities being conducted in the project.

AN EQUAL OPPORTUNITY EMPLOYER

Finally, as a reminder, States should submit a State FSNE plan to FNS on or before the August 15 deadline. We request an electronic compact disc (CD) copy of State plans and final reports. If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into its State plan document and resubmit the revised electronic copies to FNS. A State is not guaranteed reimbursement of funds for FSNE activities until it has received approval from FNS for activities described in the State's current year plan. This approval is always contingent on the availability of Federal funds.

Key Guidance changes are summarized on the attached *Guidance Highlights.* The New Guidance, with marked changes from the FY 2008 Guidance, will be available on the Food Stamp Nutrition Connection website by April 1, 2008. You may access it at: http://www.nal.usda.gov/foodstamp/National_FSNE.html.

Throughout the year, please feel free to comment on this Guidance through your FNS regional contacts. We are happy to consider your views and welcome suggestions for improvement. As always, we appreciate the continued commitment of States and implementing agencies in providing nutrition education to low-income Americans.

Sincerely,

Karen J. Walker
Director
Program Accountability and Administration Division
Food Stamp Program

Attachment

2009 Guidance Change Highlights

The following highlights briefly summarize some key changes in the Fiscal Year (FY) 2009 Food Stamp Nutrition Education Plan Guidance. This summary is not comprehensive and does not discuss changes in detail. State agencies should thoroughly review the actual FY 2009 Guidance before submitting their FY 2009 Plan.

1. **Education and Administrative Reporting System (EARS).** The final EARS form is included in this Guidance. The form is approved for three years. Appendix 9 is updated to be consistent with the final form.

2. **Management Evaluation (ME) Report Format**. This Guidance suggests areas to included in the ME, provides a format, and identifies key elements to include in the ME report.

3. **FSNE Volunteers.** A grantee (the State agency) or sub-grantee cannot claim a donated service or a good as an in-kind if it is not allowable, reasonable, or necessary for the 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 a FSNE volunteer is 18 years of age.

4. **The Use of Health Care Facilities in the Delivery of FSNE.** The allowability of this type of partnership for the delivery of FSNE hinges on whether the organization is public or private. The organizations 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 organizations is not reasonable or necessary and should be discouraged. More information is found on page 56 of this Guidance.

5. **Physical Activity Supplies.** 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.

6. **Electronic Signatures.** 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.

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State Food Stamp Nutrition Education Plan

Introduction

Under current regulations (7 CFR 272.2 (d)), State food stamp agencies have the option to provide, as part of their administrative operations, nutrition education for persons who are eligible for the Food Stamp Program (FSP).

The goal of this Food Stamp Nutrition Education (FSNE) is to improve the likelihood that persons eligible for the FSP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current Dietary Guidelines for Americans and MyPyramid.

State FSP agencies seeking Federal funding for FSNE shall submit a State FSNE plan to FNS for approval each year (7CFR 272.2). This FSNE Plan Guidance is designed to assist States with this process. Specifically, it:

- assists with the preparation of the State nutrition education plan;
- provides templates for complete and efficient plan submission (Appendix A);
- describes reporting requirements for activities covered by the plan (Appendix B);
- serves as a reference for policy regarding allowable costs and other policy issues (Appendix C);
- provides definitions of key terminology (Appendix D) and abbreviations (Appendix E);
- encourages use of the "Food Stamp Nutrition Connection," a USDA Web-based nutrition education resource for educators (Appendix F); and
- provides a timeline for planning and reporting (Appendix G).
- initiates the implementation process of Education and Administrative Reporting System (EARS Form OMB No. 0584-0542 Expires 08/31/2010) (Appendix I).

This policy guidance incorporates the FSNE Guiding Principles (September 2005), which articulates the Food and Nutrition Service's (FNS) vision for FSNE and establish standards of excellence. States should consider these principles (Appendix H) as they develop their State FSNE Plan.

This guidance provides information on FSNE in conjunction with OMB and FSP regulations and policy memorandums. Due to the diversity of FSP nutrition education activities, a comprehensive listing of all allowable and unallowable costs is not practical. All final judgments on what activities and expenses are "reasonable and necessary" are a FNS determination. States should refer to the information on allowable costs in Appendix C as they plan activities for the upcoming Fiscal Year (FY).

Nutrition Education Plan Submission and Approval Process

As specified under 7 CFR 272.2 (e) of the regulations, officials of the State food stamp agency shall sign the FSNE plan and submit it to FNS annually no later than August 15 for the following Federal FY's operation. States may submit a plan prior to the August 15 deadline and early submission is highly encouraged. The plan should be submitted to the FNS Regional Office as an electronic document (either as a Microsoft Word 2003 document or Portable Document Format (PDF) file) saved on a compact disc (CD). If FNS deems that changes to the State plan are necessary before

final approval is granted, the State should incorporate these changes into their State plan document and resubmit the electronic copies to FNS.

Reports

A final report on the previous year's activities is due annually by November 30 (7 CFR 272.2 (i)). Submit the report to the FNS Regional Office, as an electronic document (either as a Microsoft Word 2003 document or as a Portable Document Format (PDF) file) saved on a CD. Data and information for the FSP Education and Administrative Reporting System (EARS--Form OMB No. 0584-0542 Expires 08/31/2010), approved by the Office of Management and Budget in 2007, is due for each year starting in FY2008. The State food stamp agency will use the online submission system to transmit this information to FNS by December 31 of each year. State food stamp agencies may establish earlier cut-off dates for implementing agencies to submit EARS information.

A timeline for the submission process is located in Appendix G.

State Agency Liability

Food Stamp Program

Under FSP regulations at 7 CFR 272.2(c), the State agency submits to FNS for approval a Budget Projection Statement (Form 366-A OMB No. 0584-0083 Expires 10/31/2010) which provides projections of the total costs for major areas of program operations. The Budget Projection Statement (BPS) is submitted annually by *August 15*, for the upcoming fiscal year and is updated as necessary throughout the year and anytime additional Federal funding is needed. The BPS provides projections for each quarter of the next Federal fiscal year. With the BPS, the State agency also submits a narrative justification documenting and explaining the assumptions used to arrive at the projections. Under 272.2 (e), the State agency shall also submit to FNS for approval a plan for activities requiring prior approval such as an Automated Data Processing (ADP) Development Plan, Employment and Training Plan, Food Stamp Nutrition Education Plan etc. FNS has 30 days to approve, deny, or request additional information. If additional information is requested, the State agency shall provide this as soon as possible, and FNS shall approve or deny the plan within 30 days after receiving the information. FNS notifies the State agency of the Plan approval (or denial) and the authorized funding amount. Funds are then put in the Letter of Credit for the State agency to draw down to pay the Federal share of administrative costs.

Food Stamp Nutrition Education

The State food stamp agency is accountable for the contents of their nutrition education plan and for the subsequent implementation of the plan, once approved. It is responsible for making allowable cost determinations and monitoring to ensure that FSNE operators spend funds appropriately. The State food stamp agency is fully liable for repayment of Federal funds should those costs later be determined unallowable. FNS Regional Office financial management and program staff are available to provide technical and other assistance to State agencies in developing nutrition education plans. The State food stamp agency is responsible for providing technical assistance to any sub-grantees to ensure that all projects support the State's FSNE goals and objectives and to clarify which expenses are eligible for reimbursement through the FSP.

Expediting Plan Approval

State Plans of Operation for each FY are due no later than *August 15* of the year prior, and are subject to Food and Nutrition Service (FNS) approval for reimbursement (7 CFR 272.2). To ensure plans are approved and implemented at the start of each Federal FY, (*October 1*), FNS encourages State agencies to:

- Submit plans early, but no later than *August 15* (7 CFR 272.2);
- Use suggested formats and any optional templates provided;
- Follow plan guidance and provide a clear presentation of plan goals and objectives;
- Submit necessary documentation to support waivers and funding requests; and
- Be as short and concise as possible, while still being responsive to guidance

Plans that are incomplete, filled with extraneous information, or poorly organized impede the review process and can result in a denial or delayed approvals. To expedite approval, FNS recommends that the State agency do the following:

- Review the plan carefully to assure that it is consistent with the current Guidance. Both State agency program staff and the fiscal officer should review the plan to verify that all activities and costs are allowable, reasonable and necessary for the delivery of FSNE (7CFR 277 (OMB Circular A-87)).
- Construct necessary waiver requests (7CFR 272.3) carefully and provide thorough justification and documentation.
- Use the recommended templates provided in Appendix A. These templates are designed to ensure that necessary information is included and can be easily presented in your plan. These templates are also available electronically at http://foodstamp.nal.usda.gov/guidance/
- Submit only one State plan and report even though multiple State sub-grantees may exist.
    - Do not submit separate plans and reports for each sub-grantee in your State. For example, your plan should include one unified section describing the identified needs of food stamp eligibles in your State, FSNE goals and objectives for the State, etc.
- Combine all sections and templates of the State plan into one comprehensive document (either Microsoft Word 2003 or a PDF file) with continuous page numbers as opposed to separate files for each section.
- Provide project specific information as instructed in this Guidance, including information on how projects support State goals and objectives and descriptions of project implementation, staffing and budget.
- Limit the length of your State plan to not more than 150 pages, excluding appendices, and limit your final report to 50 pages excluding appendices. Use at least a twelve-point font, one-inch margins and number the pages of your plan consecutively. Provide clear and concise descriptions and justifications for the requested items.
- Verify that the appropriate State food stamp agency officials have approved, signed, and dated the plan.
- Submit your Plan to your FNS Regional Office early (7 CFR 272.2) (prior to the *August 15th* due date).
- Submit the previous year's final report to your FNS Regional Office by the *November 30th* due date (7 CFR 272.2 (i)).

- Starting in 2008, complete the EARS Form OMB No. 0584-0542 Expires 08/31/2010) online data collection form by *December 31*. See Appendix I for details.

Final Report Deadline Extension

By written request to the FNS Regional Office, States may ask to extend the deadline for Part I of the Plan (the Final Report).

Plan Amendments After Approval

State agencies shall submit amendments (7 CFR 272.2) to their approved plans to FNS for prior approval whenever there are changes in the scope of activities or an increase in the budget by 5% or $100,000, whichever is less (7CFR 277 (OMB Circular A-87)) (see Appendix C: Cost Policy). If plan amendments for the current FY include reimbursement requests for new or substantially revised FSNE activities, States shall submit them to FNS, complete with supporting documentation, **no later than May 1 of the current FY**. Submission by this date is necessary to ensure adequate time for review, approval and implementation of the proposed activities during the remaining four months of the FY. The plan amendment should be submitted to the FNS Regional Office as an electronic document (either as a Microsoft Word 2003 document or Portable Document Format (PDF) file) saved on a CD. Refer to the Expediting Plan Approval section on page 3 for requested formatting.

Management Evaluation (ME) Review of State FSNE Projects (7 CFR 275. 5 through .9)
(Performance Reporting System, Management Evaluation OMB No. 0584-0010 Expires 03/31/2010)

Selection of FSNE projects for on-site ME reviews should be based on one or more of the following factors:

- amount of expenditures over the past FY relative to other States in the region with similar population demographics and program scope;
- the quality of sample documentation used by the State agency to support reimbursements from the State agency to subcontractors;
- rate of increase in the expenditures from one FY to the next;
- known or suspected difficulties in program administration or operation; and
- length of time since the State's FSNE services were last examined.

This review will assess whether:

- the State agency has a process in place to review and monitor grantees' and sub-grantees' nutrition education operations;
- operations are consistent with the terms of the approved plan;
- activities are targeted to participating and potentially eligible FSP clients;
- projects are being evaluated for effectiveness;
- sources of State funds are appropriately documented, allowable and not used as match for other Federal programs;
- administrative expenses are reasonable, necessary and properly documented and allocated
- States are submitting developed materials to the National Agricultural Library, Food and Nutrition Information Center for consideration and inclusion on the Food Stamp Nutrition Connection Web site.

ME Report Format:

- A specific template or format is not required when organizing the ME report however it is suggested that the following elements are included when compiling the report:
    - Cover page and table of contents
    - Executive Summary- a one-page summary of overall evaluation results;
    - Background information such as the purpose of the ME as well as the name and location of the State agency (SA), personnel involved in the review process and the dates of the review.
    - Review Areas:
        - The SA process for reviewing FSNE projects within their State;
        - Operational consistency with approved FSNE plan;
        - Targeting mechanisms for eligible FSNE populations
        - Evaluation and effectiveness of FSNE project
        - Financial management :
            - Time and Effort records
            - Documentation of State matching funds
            - Administrative expenses documented and allowable
            - Program income accurately reported
        - Curriculums and project materials are consistent with the Dietary Guidelines for Americans and MyPyramid and include appropriate statements such as funding source and the USDA discrimination statement
    - Review Results for each Review Area:
        - Scope
        - Methodology
        - Observations
        - Findings
        - Recommendations
    - Summary

Focus of Food Stamp Nutrition Education

State plans should include behaviorally focused, science-based nutrition education interventions, projects or social marketing campaigns that fall within the focus of FSNE and are consistent with FNS priorities. The focus of FSNE is:

- Health promotion to help FSP eligibles establish healthy eating habits and a physically active lifestyle.
- Primary prevention of diseases to help FSP eligibles that have risk factors for diet-related chronic disease prevent or postpone the onset of disease by establishing more physically active lifestyles and healthier eating habits.

The Dietary Guidelines for Americans are the foundation of nutrition education in all FNS nutrition assistance programs. Therefore, messages delivered through FSNE should be consistent with the latest Dietary Guidelines for Americans and the associated Food Guidance System, MyPyramid. Please refer to the USDA Center for Nutrition Policy and Promotion Web site at http://www.cnpp.usda.gov/ for complete information on the Dietary Guidelines for Americans and MyPyramid.

Nutrition Education Key Behavioral Outcomes

To magnify the impact of FSNE, FNS encourages States to focus their FSNE efforts on the following behavioral outcomes:

- Eat fruits and vegetables, whole grains, and fat-free or low-fat milk products every day.
- Be physically active every day as part of a healthy lifestyle.
- Balance caloric intake from food and beverages with calories expended.

States may address other behavioral outcomes consistent with the Dietary Guidelines for Americans as long as the primary emphasis remains on dietary quality. Dietary quality in this Guidance pertains to the selection and consumption of healthy foods within a limited budget. States should refer to additional guidance in this document regarding physical activity, Program outreach, and gardening activities.

Coordination and Collaboration

The likelihood of nutrition education changing behaviors is increased when consistent and repeated messages are delivered through multiple channels using multifaceted approaches. FNS encourages participation in the State Nutrition Action Plan (SNAP) process including getting involved with and serving on the State SNAP team. The SNAP teams work together to connect nutrition education across programs and to collaborate and develop more integrated nutrition education approaches (see Appendix D: Definitions). SNAP brings FNS and related programs together to work toward a common nutrition goal, connecting the efforts and resources of the State nutrition assistance programs to achieve that goal.

More information on the SNAP process is available on the FNS Web site at http://www.fns.usda.gov/oane/SNAP/SNAP.htm. State FSNE plans should include information on how the FSP is participating in the SNAP process. Written agreements (e.g., Memorandums of Understanding) are needed for all collaborative projects (see Part II, Section B. Goals, Objectives, Strategies and Coordination). A representative of each State agency/organization participating in the collaboration should sign these agreements.

Guidance for State Plan Reporting and Preparation

The following section provides guidelines for completing your nutrition education plan. The plan consists of two parts:

- Part I requests a report on previous year activities, and
- Part II requests a description of the coming year's planned activities.

For the convenience of State agencies, we have provided optional templates in Appendix A for use in reporting information requested in this plan guidance. We strongly recommend the use of these templates since incomplete or poorly organized information will delay nutrition education plan review and approval or result in a denial. Prior to writing your plan, review all guidance carefully to ensure that your plan meets basic requirements.

Part I. Annual Final Report of Nutrition Education Activities (7 CFR 272.2 (i))

Summarize the nutrition education projects implemented in the previous FY. Based on the results of your evaluation, also include discussion on the outcomes and effectiveness of the FSNE program and how your program might be improved in the upcoming FY. This final report is due to your FNS regional office by November 30th of every year for the previous FY. Additional information regarding submission deadlines may be found on pages 1-4.

Appendix A. Template 1 has two sections, A and B. It is recommended that State agencies use both Sections A and B to prepare their annual final reports. Section A will assist State agencies to summarize information about approved FSNE activities, both nutrition education and social marketing, implemented in the previous FY. In response to requests, we have provided Section B to assist State agencies in summarizing significant evaluation activities (generally considered to be those costing more than $400,000) by providing key discussion points to include in the report in order to describe the methods and results of each approved Program objective.

Section A. Final Report Summary for Projects and Social Marketing

The purpose of section A in this report is to provide a summary of your State's activities during the previous fiscal year. Section A describes the process of summarizing a State's nutrition education projects and social marketing campaigns. A project is a discrete unit of nutrition education intervention at the local level. A social marketing campaign is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior (see full definitions in Appendix D). The following information should be included in your report summary <u>by project or social marketing campaign</u>:

1. Name of project or campaign (should correspond with the project name in your plan).
2. Geographical areas reached (i.e., cities, counties or statewide).
3. Type and number of delivery sites (list the type and number of locations where classes were delivered, not the number of times classes were delivered). For example, list the number of unique congregate meal sites where classes were delivered in the State.
4. Length of any social marketing campaigns (i.e., number of months). .
5. Description of the intended target audience. .

6. Project/Campaign reach
    - For each project, provide the estimated total number of individuals participating (this is an unduplicated count of individuals not the number of contacts). .
    - For social marketing campaigns, the estimated total number of persons reached through the campaign. .
7. Methods
    - For projects, the frequency, duration and type of educational methods (e.g., number and duration of one-on-one counseling sessions, group classes, etc.).
    - For social marketing campaigns, the primary activities conducted (e.g., campaign development, use of mass communications, print materials, public events, etc.).
8. Key message(s).
9. Type of evaluation (formative, process, outcome, or impact see page19 for definitions), and status i.e., ongoing or completed.

Section B: Final Report Summary for Evaluations

The purpose of section B is to summarize the evaluation results of your State's nutrition education and social marketing activities. Section B provides guidance on key information to include in the summary. Including the following information by project or social marketing campaign will ensure that your report meets the basic requirements.

1. *Name of project or social marketing campaign.* If multiple projects or campaigns were part of a single impact evaluation please list them all by project or campaign name.
2. *Key evaluation impact(s).* Identify each impact being assessed by the evaluation. For example, are FSNE participant more likely than non-participants to report they intend to increase their fruit and vegetable intake? Or do a greater proportion of FSNE participants choose low-fat (1% or fat-free) milk in the school cafeteria compared to non-participants?
3. *Evaluation participants.* Describe the population being evaluated and its size. For example, all (1200) kindergarten students at public schools in one school district.
4. *Assignment to intervention and control or comparison conditions.* An impact evaluation requires comparing those who receive the nutrition education being evaluated (i.e. referred to as the treatment or intervention group) to those who don't receive any nutrition education (i.e., the control group) and/or to those who receive another kind of nutrition education (i.e., comparison group).
    - Describe the unit of assignment to intervention and control groups. For example, an intervention focused on kindergarten students may assign school districts, individual schools, classrooms, or individual student to intervention and control groups.
    - Describe how assignment to intervention and control groups was carried out. Be explicit about whether or not assignment was random. For example, ten kindergarten classrooms were randomly assigned to intervention and control groups.
    - Describe how many units and individuals were in the intervention and control groups at the start of the intervention.
5. *Impact Measure(s).* For each evaluation impact, describe the measure(s) used. Descriptions should indicate if the focus is on knowledge, skills, attitudes, intention to act, behavior, or something else. Each measure should be characterized in terms of its nutritional focus, e.g. low fat food preparation, number of whole grain servings consumed, ability to accurately read food labels Finally indicate if impact data were collected through observation, self-report, or another method.
        - Describe the points at which data were collected from intervention and control group participants. For example, these points may include pre-test or baseline,

midway through the intervention, post-test as intervention ends or follow-up some weeks or months after the intervention ends.

6. *Results.* Compare intervention and control groups at each measurement point, by individual measure. Report the number of intervention and the number of control group participant measured at each point. Describe any tests of statistical significance and the results
7. *Reference.* Provide a contact for additional details and a reference to any other report of the evaluation.

Part II. Food Stamp Nutrition Education Plan for the Coming FY (7 CFR (272.2 (e))

Section A. Identifying and Understanding the Target Audience

The Food Stamp Act, as amended, indicates that nutrition education activities should be directed to persons eligible for the FSP. FSP eligibles are persons that meet criteria for participation in the FSP as described in Federal legislation and regulations. Henceforth, use of the term "target audience" in this document will refer to FSP eligibles according to this definition (see also Appendix D: Definitions).

In Table I (pages 10-12); FNS has categorized potential recipients of State FSNE activities. The three categories of FSNE recipients are:

- Category 1: Certified Eligibles;
- Category 2: Likely Eligibles; and
- Category 3: Potentially Eligible by Site/Location

Categories are prioritized according to the likelihood that FSNE recipients will be FSP eligibles, the FSNE target audience. Categories 1 and 2 offer the greatest opportunity to reach FSP eligibles. Consequently, efforts serving Categories 1 and 2 are preferred. States should deliver FSNE in a way that maximizes the number of FSP eligibles reached and the potential for behavior change among them.

Category 1: Certified Eligibles includes persons that participate in the formal FSP certification process (e.g., FSP participants) and are determined eligible. They are the only persons known, with certainty, to meet criteria for participation in the FSP. As such, FSP participants, who consist of over 25 million of the nation's neediest people, are at the core of FSNE efforts. States may provide FSNE to Category 1: Certified Eligibles without a waiver of Program exclusivity regulations.

Category 2: Likely Eligibles are persons that are eligible for the Program but have not yet applied. Since non-participating eligibles have not gone through the formal FSP certification process, they are not as easy to identify as persons who have applied and been certified. To facilitate the delivery of FSNE to non-participating eligibles, FNS is allowing FSNE providers to use two types of proxy measures of eligibility:

1) Income-based proxy- Under the income-based proxy, persons with gross income levels at or below 130% of the Federal poverty guidelines fall within Category 2. Persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C) are exceptions to this proxy criterion.

2) Location-based proxy- Under the location-based proxy criteria, persons at food banks, food pantries, soup kitchens, public housing and FSP/TANF job readiness program sites fall into Category 2 with certain qualifiers. See Table I for more information on these locations and examples of Category 2: Likely Eligibles.

States may provide FSNE without a waiver of Program exclusivity regulations to Category 2: FSP Likely Eligibles.

Category 3: Potentially Eligible by Site/Location consists of persons at other venues primarily frequented by low-income audiences. FSNE activities delivered to this audience provide a fair likelihood of benefiting FSP eligibles. As a portion of this audience may be ineligible for the FSP, States shall request an exclusivity waiver (7CFR 272.3) (Appendix C, Section A.3) for projects delivered to Category 3 audiences. States should consider delivering FSNE to Category 3 audiences only after making a clear effort to provide FSNE to Category 1 and 2 audiences. Generally, this audience may receive FSNE when it is not possible or practical to separate out Program eligibles and/or identify Program eligibility. Projects for which exclusivity waivers are requested shall be delivered to a generally low-income audience (7CFR 272.3). Category 3 covers these situations:

A. A site/location that serves low-income persons. At least 50% of those persons should have incomes at or below 185% of poverty.
B. Retail grocery stores with average monthly levels of $50,000 of FSP benefit redemptions.

Other Audiences: For audiences that do not fall within Categories 1-3, see Appendix C: Section A.17 to prorate costs.

Table I. Audiences for Food Stamp Nutrition Education

	Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
CATEGORY 1	**Certified Eligibles** Includes persons currently participating in or applying for the FSP and/or persons residing in a FSP household. *This is the known FSP target audience.*	FSNE activities delivered to this audience clearly benefit FSP eligibles.	• Persons referred by the local FSP office. • Persons reached through direct marketing to FSP participants. • Persons participating in the Food Distribution Program on Indian Reservations (FDPIR; see Appendix C, Section A.3). • Ineligible parents who receive FSP benefits on behalf of their child. • FSP participants in a FSP Job Readiness Training Program.	**No**

*Exclusivity waivers are needed when FSNE projects will inadvertently reach persons that may be ineligible for the FSP (see Appendix C).

Table I. Audiences for Food Stamp Nutrition Education

	Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
CATEGORY 2	**Likely Eligibles as Established by Proxy Criteria** One of the following proxy criteria should be met: A. By Income. Persons not falling into category 1 above that have gross incomes at or below 130% of poverty guidelines. This criterion does **not** include persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students- see Appendix C).	FSNE activities delivered to this audience are very likely to benefit FSP eligibles. For the income-based proxy, partnerships are needed with other programs that have formal means-tested certification processes or similar income participation criteria. These partnerships will involve the implementation of a referral procedure that is based on income eligibility criteria.	• Income eligible persons (130% of poverty guidelines) referred by WIC, Medicaid, or Child Nutrition Programs. • Persons receiving Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF; see Appendix C, Section A.3 for more details on categorical eligibility). • Persons participating in TANF Job Readiness Training Programs.	**No**
CATEGORY 2	B. By Location. Persons receiving FSNE at: • FSP/TANF offices • public housing (See Appendix D: Definitions) • food banks, food pantries, and soup kitchens in conjunction with the distribution of foods to needy persons at these sites (see Appendix D: Definitions). Note: food distribution is not a reimbursable FSNE expense (see Appendix C).	FSNE activities delivered to this audience are very likely to benefit FSP eligibles. For the income-based proxy, partnerships are needed with other programs that have formal means-tested certification processes or similar income participation criteria. These partnerships will involve the implementation of a referral procedure that is based on income eligibility criteria.	• Persons in a TANF office waiting area or conference room. • Persons at a public housing apartment community room or lobby. • Persons visiting a food pantry to obtain food. • Persons receiving a meal at a soup kitchen.	**No**

*Exclusivity waivers are needed when FSNE projects will inadvertently reach persons that may be ineligible for the FSP (see Appendix C).

Table I. Audiences for Food Stamp Nutrition Education

	Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
CATEGORY 3	**Potentially Eligible by Site/Location** A. Venues serving low-income populations based on income. Persons at venues when it can be documented that the location/venue serves generally low-income persons where at least 50% of persons have gross incomes at or below 185% of poverty guidelines/thresholds.	FSNE activities delivered to this audience provide a fair likelihood of benefiting FSP eligibles by providing services in sites/locations primarily frequented by a low-income audience. This audience may be served when it is not possible or practical to separate out Program eligibles and/or identify Program eligibility (e.g., social marketing campaigns). FSNE delivered to this audience should still be designed to meet the needs of FSP eligibles.	• Persons residing or schools located in census tract areas where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold. • Children in schools where at least 50% of children receive free and reduced priced meals. • Persons participating in the WIC program. • Persons shopping in grocery stores located in census tracts where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold.	**Yes**
	B. Based on FSP redemptions. Persons at stores with average monthly FSP redemptions of $50,000. Stores with lower redemptions that do not meet the $50,000 threshold but do meet the 50 percent of 185 percent low-income criterion may continue to be used as FSNE sites with an approved waiver.		• Persons shopping in grocery stores when the store has been documented to redeem average monthly FSP benefits of $50,000 or more.	**Yes**

*Exclusivity waivers are needed when FSNE projects will inadvertently reach persons that may be ineligible for the FSP (see Appendix C).

Section A of your State FSNE Plan should describe the target audience in your State and your assessment of their needs. A needs assessment is intended to better focus nutrition education and promotion activities. The results should capture information on the relevant characteristics of the target audience and the extent to which nutrition education services are being delivered already to the target audience. Plans should make an explicit connection between needs assessment findings, plan objectives, and the description of where and to whom activities are focused.

The necessary components of this section of your Plan are outlined below and in Template 2 provided in Appendix A.

Describe and justify your methodology for assessing the needs of the target audience in your State and report your findings.

- **First Review Existing Information.** The first step is to review existing data. The SNAP link http://www.fns.usda.gov/oane/SNAP/SNAPMap.htm contains useful information that is reported by States. Organizational partners should also be considered as a source of relevant data. Pertinent findings from such existing information reviews should be included in State plans. If the State conducted a needs assessment of the same target audience in the last few years, such results should be reviewed

- **Collect New Data Selectively.** If there are significant gaps in the available information, States may propose new (primary) data collection (e.g. focus groups, surveys, and key informant interviews). Plans should describe the questions to be answered in any new data collection, as well as the steps they propose to answer them. Additional information on the collection of needs assessment data is available in Needs Assessment Resource Manual: A Guide for State Nutrition Education Networks (US Department of Agriculture, Food and Nutrition Service, 1997) at: www.fns.usda.gov/oane/MENU/Published/nutritioneducation/Files/NeedsAssmt-Man.pdf

Describe the findings of your needs assessment. When available, the following information should be addressed in this section of your plan:

1. Description of the target audience in your State. Examples of population characteristics and demographic data that may help you plan and deliver FSNE effectively include: geographic location (i.e., areas and neighborhoods where FSP eligibles reside, FSP participation rates, income-relevant census tract information, location of public housing, etc.), race/ethnicity, age, gender, family composition, education and primary language. A needs assessment will help target FSNE effectively and efficiently to yield the greatest change in dietary behavior among the largest number of food stamp eligibles. Nationally, women living in households with children and children themselves comprise the majority of persons receiving FSP benefits. Consequently, FNS recommends that States maximize their investment in FSNE by targeting first, women, and then children in FSP eligible households. Food Stamp Household Characteristics Reports, based on food stamp Quality Control data, are available at: http://www.fns.usda.gov/oane/MENU/Published/FSP/FSPPartHH.htm

2. Nutrition-related behavioral and lifestyle characteristics of the target audience in your State. Examples of characteristics that may enhance your ability to develop, target, and deliver FSNE messages include dietary and food purchasing attitudes and habits as well as where and how FSP eligibles eat, redeem food stamp benefits, live, learn, work and play. Cite sources of data provided.

3. Availability of other nutrition-related programs, services, and social marketing campaigns that target low-income populations in your State (e.g., WIC, Team Nutrition, EFNEP, food banks, public health services). This information will help you identify potential partners for message collaboration and avoid duplication of existing services.

4. Areas of the State where the target audience is underserved or has not had access to FSNE previously. Identify where the neediest target audiences are and describe the nutrition services available to these audiences.

5. Implications of needs assessment. Provide a brief summary of the implications of the needs assessment findings, i.e. how has the State applied the needs assessment to the current year's FSNE plan.

Section B. Goals, Objectives, Projects, Campaigns, Evaluation and Coordination

Template 2 in Appendix A will assist you in completing this section. Based on your needs assessment above and the current availability of other nutrition education services, identify your State's goals and objectives for FSNE and the methods you will use to achieve them.

1. Identify State FSNE goals and accompanying measurable objectives. Your goals should illustrate the overall purpose of FSNE activities. A well-written and clearly defined objective is:
   - Specific. It identifies a specific event or action that will take place.
   - Measurable. It quantifies the amount of change to be achieved.
   - Appropriate. It is logical and relates to the State's FSNE goals.
   - Realistic. It is practical given available resources and the proposed FSNE activities.
   - Time specific. It specifies a time by which the objective will be achieved. These objectives should be completed within the FY of the plan.

Example of a State-level objective:

- *By September 30th increase the consumption of fruits and vegetables among women and children participating in the FSP statewide by 5% and 3%, respectively, through the delivery of an intensive multi-channel intervention targeting this segment of the FSP population.*

State goals and objectives should be linked conceptually to the project or local level objectives described in the next section. An explanation of how the results of your needs assessment support the chosen objectives should be provided.

2. Describe the nutrition education projects/interventions that you plan to implement to support the goals and objectives listed in number 1. For each project, provide the following:

a. The objectives that the project/intervention supports. Project level objectives should not be selected in isolation, but should support State FSNE goals.

Example of a project-level objective:

- *After six 1-hour classes, FSNE participants will increase their average daily consumption of dark green vegetables by ½ cup per day.*

b. The target audience that will receive the project/intervention, specifying all relevant characteristics and results of your needs assessment (see Section A) (e.g., demographic characteristics, nutrition-related characteristics, etc.).

c. A brief explanation of how project delivery will focus education on FSP eligibles.

d. Description of project implementation features, giving particular attention to: key educational messages, how and where messages will be delivered, overall period of time or duration of project, the projected total number of individuals participating or reached, and the estimated number of contacts per person reached.

e. A brief summary of existing research that is relevant to the proposed educational approaches and target audience. Indicate the extent to which prior studies demonstrate the feasibility and effectiveness of your proposed nutrition education methods.

f. A justification for adapting or changing an identified intervention/project method or strategy.

g. The title, author, source and description of existing educational materials (including existing materials that you will purchase) that will be used in the delivery of the project/intervention. Specify if materials are in languages other than English. If there is a cost for these materials, provide a justification for using proposed materials versus those that are available at no cost.

   NOTE: FNS recommends that States use FNS materials (e.g., *Eat Smart, Live Strong, Loving Your Family…*, appropriate Team Nutrition, Loving Support, and Eat Smart. Play Hard.™ materials). States should note that some Federal nutrition materials feature activities that are not allowable costs under the FSP (e.g., the implementation of infrastructure changes).

The following collections of nutrition education resources are available to help States identify existing materials:

- Food Stamp Nutrition Connection (see also Appendix F)
  http://foodstamp.nal.usda.gov
- Eat Smart. Play Hard.™
  www.fns.usda.gov/eatsmartplayhard/
- WIC Works Resource System
  www.nal.usda.gov/wicworks/
- Team Nutrition
  www.fns.usda.gov/tn
- MyPyramid.gov
  www.mypyramid.gov
- Dietary Guidelines for Americans
  www.cnpp.usda.gov
- Food and Nutrition Service-FNS Nutrition Link
  www.fns.usda.gov/nutritionlink

h. A description of any new materials you plan to develop and/or produce, along with the results of your review of existing material and the rationale for creating new versus using existing educational material.

Note: Whenever possible, it is preferable to use and/or adapt existing materials rather then develop new materials, especially FNS materials developed primarily for the Food Stamp Program such as:

- ***Loving Your Family Feeding Their Future, Nutrition Education Through the Food Stamp Program*** - educational and promotional materials and techniques to help FSNE educators work with low-income women with children including Spanish speakers and those with limited reading skills**.**
- ***Eat Smart, Live Strong*** – a behavior-focused nutrition and physical activity intervention for healthy, low-income adults, 60-74 years old that is designed to increase their fruits and vegetable consumption and physical activity.

Other FNCS materials to consider include:

- *Eat. Smart. Play Hard.*™
- *MyPyramid*
- *MyPyramid for Kids*
- *Team Nutrition*
- *Loving Support*

Note: See the "Important Notes about Materials" on pages 17-18 for more information regarding materials requirements.

Important Notes about Materials

- **The FSNE Guidance and any subsequent policy memoranda serve as the reference source for allowable materials questions.**

- States should ensure that all nutrition messages conveyed as a part of FSNE are consistent with the Dietary Guidelines for Americans and the goal and focus of FSNE as described on pages 1 and 5 of this Guidance. FNS encourages States to focus on messages related to the three behavioral outcomes listed on page 6.

- Materials developed or purchased with FSNE funds should have vocabulary that is familiar with a minimal use of jargon and technical terms. Materials should be designed to address cultural, literacy, language and income barriers faced by many FSP eligibles.

- FSNE funds may not be used to convey negative written, visual, or verbal expressions about any specific foods, beverages, or commodities. This includes messages of belittlement or derogation of such items, as well as any suggestion that such foods, beverages, or commodities should never be consumed (see Appendix C). FNS regional office staff may ask to review media messages and materials prior to their release, particularly when States are planning large media campaigns and productions.

- FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROMs and related source codes, literature, or other products produced, in whole or in part, with FSP funds for government purposes (7 CFR 272.5(a)(4)). For more information, see Appendix C.

- Curricula and social marketing campaigns should be science-based and behaviorally focused as defined under Principle 4 of the FSNE Guiding Principles (see Appendix H). They should incorporate general educational features that have demonstrated effectiveness such as behaviorally focused messages; use of motivators and reinforcements that are personally relevant to the target audience; use of multiple channels of communication to convey messages; approaches that provide for active personal engagement; and intensity/duration that provides opportunity for multiple exposures to the message.

- Materials with subject matter that is beyond the scope of FSNE, including the screening for diseases and the treatment and management of diseases, are not allowable.

- We encourage States to submit their materials to the Food Stamp Nutrition Connection Web site for consideration and inclusion in the Resource Finder Database. Appendix F provides detailed information about the Food Stamp Nutrition Connection.

(Continued on page 18)

Important Notes about Materials
(Continued from page 17)

- Materials developed or reprinted with FSP funds shall include the following non-discrimination statement (7CFR 272.5):
  - **English:** "In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability.

    To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800)795-3272 (voice) or (202)720-6382 (TTY). USDA is an equal opportunity provider and employer."

  - **Spanish:** De acuerdo con la ley federal y las políticas del Departamento de Agricultura de los EE.UU. (USDA, sigla en inglés), se le prohibe a esta institución que discrimine a base de raza, color, origen nacional, género, edad, religión, credo político, o impedimentos.

    Para presentar una queja sobre discriminación, escriba a USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, o llame al (800) 795-3272 (voz) o (202) 720-6382 (TDD). USDA es un proveedor y empleador que ofrece oportunidad igual para todos.

- **Note:** Additions, edits, or deletions to the Civil Rights statement are not allowed. There are no print size requirements when the statement above is used. If the material is too small to permit the full statement to be included, the material at a minimum shall include the statement, in print size no smaller than the text that states:

  - **English:** "This institution is an equal opportunity provider and employer."
  - **Spanish:** "USDA es un proveedor y empleador que ofrece oportunidad igual para todos."

- Credit shall be provided to the FSP as a funding source on newly developed and reprinted materials. The following statements are recommended:

  - **English**: "This material was funded by USDA's Food Stamp Program."
  - **Spanish**: "Este material se desarrolló con fondos proporcionados por el Programa de Cupones para Alimentos del Departamento de Agricultura de los EE.UU. (USDA para sus siglas en inglés)."

- A brief outreach message about the FSP should be provided on all newly developed or reprinted materials, including materials for television, radio, and other media. The following statements are recommended:
  - **English:** "The Food Stamp Program provides nutrition assistance to people with low income. 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]."
  - **Spanish:** "El Progama de Cupones para Alimentos ofrece asistencia relacionada a la nutrición para gente con bajos ingresos. Le puede ayudar a comprar comida nutritiva para una mejor dieta. Para obtener más información, comuníquese con la oficina de servicios sociales de su condado."

The Agency views evaluations as a reasonable and necessary activity when:

- Research focuses on the proposed nutrition education activities;
- Plans indicate the relevance and value of information sought to project implementation and/or effectiveness;
- A description of any proposed evaluation is included;
- A commitment is made to report evaluation status and available results in subsequent annual reports.
- FNS encourages States to publish and disseminate findings from their evaluation of FSNE projects so that other States with FSNE initiatives could benefit from the knowledge and insight of the research.

The following types of evaluation are appropriate and may be included in your State plan. Please note that the definitions for the different types of evaluations can be found at www.fns.usda.gov/oane/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf

- Formative-which can involve pre-testing of draft nutrition education materials to answer questions about whether materials are understandable, relevant, credible and acceptable to the target audience;
- Process-which can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering nutrition education and/or barriers to implementing the intervention;
- Outcome-which demonstrates changes that occur in the presence of an intervention but do not establish cause and effect conclusions; and
- Impact-which indicate how effective the intervention was in changing the target populations' attitudes, awareness and/or behavior.

Whenever a State carries out **a FSNE** evaluation activity that costs more than $400,000 in total, FNS strongly recommends that an impact evaluation be conducted. This is regardless of whether the $400,000 is spent in one or multiple years. The impact assessment should meet the criteria described in the FNS Principles of Sound Impact Evaluation found at: www.fns.usda.gov/oane/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf

The Agency asks that you describe ALL proposed evaluation activities. For each evaluation, please indicate:

- the project or projects with which it is associated;
- the type of evaluation as primarily a formative, process, outcome or impact assessment;
- the question(s) to be addressed by the evaluation;
- the approach to conducting the evaluation, including scope, design, measures and data collection;
- plans for using the results; and
- whether or not the project has been evaluated previously, along with the most recent year in which the evaluation was done.
- project cost

Note: For information about program evaluation, FNS recommends the following guidance:

- Nutrition Education: Principles of Sound Impact Evaluation www.fns.usda.gov/oane/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf
- Journal of Nutrition Education: 33, Supplement 1, 2001

- Evaluating Social Marketing in Nutrition: A Resource Manual
  www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF
- WIC Evaluation Resource Guide
  www.fns.usda.gov/oane/MENU/Published/WIC/FILES/WICEvaluationResourceGuide.pdf

4. Describe efforts to coordinate, complement and supplement other FNS programs in order to deliver consistent behavior-focused nutrition messages.

   - Describe your involvement with the State Nutrition Action Plan (SNAP) initiative in your State. Outline any tasks in the SNAP process the FSP will lead or conduct during the FY.
   - For FSNE projects delivered in coordination with another agency, the State should submit, with their plan, a copy of a written agreement (e.g., a Memorandum of Understanding) that clearly outlines the responsibilities of all the State agencies involved in the collaboration. Written agreements are required for all collaborations that involve any type of financial or budget management issues such as cost sharing, in-kind contributions etc. The written agreements may be submitted in electronic format. In addition, this MOU should list the location and the contact information for the responsible person(s) for each project implemented at the local level. A separate MOU for each local level project implemented under the agreement is not necessary. The State-level MOU is signed by all the State agencies involved. Examples where an MOU would be necessary are school-based projects that collaborate with the State Department of Education or a breastfeeding project that collaborates with the WIC State agency. In the WIC example there would be one MOU signed between the State WIC agency and the State FSP agency that would include a list of all the local level breastfeeding projects to be implemented under the agreement. For the county governments, if there is no "umbrella" organization that can sign an agreement on behalf of the local entities, then a written agreement for each local project is needed.

Section C. Staffing (7 CFR 272.2 (d) (2) (i))

We recommend the use of Template 3 in Appendix A to provide the information requested on costs associated with the employment of staff for FSNE. Please note that all staff paid with FSNE funds should support the delivery of FSNE to FSP eligibles. For each project, provide the following information for all paid staff that will carry out FSNE functions. Volunteer time should not be included in this section, but should be included as part of the budget narrative describing in-kind donations (see Appendix C, Section A.4 for additional information on in-kind donations).

1. Position title (e.g., Nutrition Educator, Project Coordinator, etc.).
2. For each position title, attach a statement of work/position description outlining the duties associated with the FSNE project. This should clearly show how the position supports the delivery of planned FSNE activities.
3. For each position title, provide the Full Time Equivalents (FTEs) that will be funded through FSNE. FTEs are defined in Appendix D: Definitions. States may use their own definition of FTEs for purposes of reporting FSNE staffing needs in this section, but should provide their definition with an explanation of how FTEs are calculated.
4. For each position title, provide the percentage of FSNE time the position will spend performing management/administrative duties (including training and professional development) and the percentage of FSNE time that the position will spend on direct

delivery of FSNE. This information should coincide with information provided in the attached statement of work/position description.

5. For each position title, provide the total annual salary, total FSNE salary, benefits and wages, and specify the amount of the total to be funded with Federal dollars and State/other dollars (estimate may be used for budget, but actual time spent shall be used for billings (7CFR 277 (OMB Circular A-87))).

Section D. Budget Summary

We recommend the use of Template 4 in Appendix A for the submission of this information.

1. Contracts, Grants or Agreements for Nutrition Education Services
   If the State agency intends to contract for FSNE with sub-grantees, list each sub-grantee that is a recipient of Federal grants, cooperative agreements or contracts related to FSNE. Attach a copy of any interagency agreement(s) that identifies how Federal funds will be shared between the State or county agency and/or other agencies. Include the following for each sub-grantee:

   a. Name of Sub-Grantee
   b. Total Funding (Federal And Non-Federal) for Contract, Grant, or Agreement
   c. Federal Funding Requested
   d. State and Other Non-Federal Funding Provided and Source in Terms of Cash and In-Kind Sources
   e. Description of Services and/or Products
   f. Cost of Services and/or Products

2. Project Costs
   For each sub-grantee, provide the State and Federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at a minimum the information contained in Appendix A, Template 4.

3. Travel
   Travel requests should be identified for in State and out-of-State purposes. States shall justify the purpose of the travel, describe how the travel request supports the State's FSNE goals and objectives, (7CFR 277 (OMB Circular A-87)). Refer to Appendix C, Section A.16 for information on what travel-related costs are allowable. Provide the following information for travel in your FSNE budget:

   a) In-State Travel
      i. Travel Purpose
         - How attendance will benefit FSNE program goals and objectives
         - Justification of Need for Travel
         - Travel Destination (city, town or county or indicate local travel)
         - Number of Staff Traveling
         - Cost of Travel for this Purpose
      ii. Total In-State Travel Cost

   b) Out-of-State Travel
      i. Travel Purpose and/or Name of Conference
         - How attendance will benefit FSNE program goals and objectives

- Justification of Need for Travel
- Travel Destination (city and State)
- Number of Staff Traveling
- Cost of Travel for this Purpose

ii. Total Out-of-State Travel Cost

Section E. Assurances (7 CFR 272.2 (d) (2) (iii))
(Appendix A, Template 5)

To assure compliance with policies described in this guidance, the FSNE plan should include the following assurances that:

1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight of any sub-grantees. The State food stamp agency is fiscally responsible for nutrition education activities funded with FSP funds and is liable for repayment of unallowable costs.
2. Efforts have been made to target FSNE to FSP participants and eligibles.
3. In cases where FSNE projects may inadvertently benefit persons that are ineligible for the FSP because it is not practical or possible to meet the exclusivity requirement, the State has sought approved waivers for each project. To be approved, the waiver request(s) shall (7CFR 272.3) clearly demonstrate how the proposed project provides a good means of reaching food stamp eligibles and documents that at least 50 percent of those reached will have gross incomes at or below 185 percent of the poverty thresholds or guidelines.
4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional FSP eligibles or to provide additional education services to EFNEP clients who are eligible for the FSP. In no case may activities funded under the EFNEP grant be included in the budget for FSNE.
5. Cash or in-kind donations from other non-Federal sources to FSNE have not been claimed or used as a match or reimbursement under any other Federal program (7CFR 277 (OMB Circular A-87)).
6. Costs incurred by other State and/or local agencies for goods and services for FSNE and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project (7CFR 277 (OMB Circular A-87)).
7. Documentation of State costs, payments, and donations for approved FSNE activities are maintained by the State and will be available for United States Department of Agriculture review and audit.
8. Contracts are procured through competitive bid procedures governed by State procurement regulations.
9. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues. A State agency is responsible for civil rights compliance of its sub-grantees, contractors, and sub-recipients. The State agency (the cognizant agency) is responsible for ensuring the compliance of all funded providers. This responsibility includes periodic compliance review, the frequency of which is defined in Appendix A of FNS Instructions 113-1 and 7 CFR part 275 of the regulations.

10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them. This applies to all activities and costs under both Federal and State budget shares.
11. Program activities are reasonable and necessary to accomplish FSNE objectives and goals.
12. All materials developed or printed with FSNE funds include the appropriate USDA non-discrimination statement, credit to the FSP as a funding source, and a brief message about how the FSP can help provide a healthy diet and how to apply for benefits.
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage, or commodity.

Section F. Waiver Requests
(Appendix A, Template 6)

Under the provisions of 7 CFR 272.3(c), FNS has the authority to approve requests from State agencies for waivers of regulatory requirements, provided the waivers are not inconsistent with the provisions of the Food Stamp Act and do not adversely affect participants or applicants. In addition, States shall show how a waiver will improve the efficiency and effectiveness of the FSP, and concomitantly, would not increase Federal costs. The two waivers relevant to the administration of FSNE are noted below with additional detail and instructions pertaining to FSNE-related waiver requests provided in Appendix C, Section A.3 and a general template provided in Appendix A. States that are not requesting waivers may skip this section.

When persons that are ineligible for the FSP may inadvertently benefit from FSNE projects because such persons cannot be separated out from those eligible for the Program, States shall submit exclusivity waivers for each project (7 CFR 272.3; see definition for "project" in Appendix D: Definitions). See Appendix C, section A.3 for information on waiver requests, exceptions to the exclusivity waiver requirement, and details on the justification and documentation required. Template 6 provides the general waiver request outline. As described in further detail in Appendix C and Template 6, waiver requests shall (7CFR 272.3):

- Be completed on a "project" basis, meaning that they are requested for a defined geographical area.
- Describe in detail the procedures the State agency plans to follow in lieu of the regulatory requirement.
- Justify why it is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences.
- Show how the project provides an efficient and effective means of reaching FSP eligibles.
- Anticipate the impact on FSP eligibles in terms of quality of services, any administrative or Program savings, and any adverse effects on FSP eligibles or the State agency if the waiver is not granted.
- Provide documented demographics to demonstrate that at least 50 percent of the population that will benefit from the FSNE activity has an income that is at or below 185% of the poverty guidelines/thresholds or provide documentation that the setting is a high volume FSP authorized retail grocer with average monthly FSP redemptions of $50,000 or more over a 12 month period.
- Be signed and dated by the requesting official.

Federal regulations prohibit the consideration of private cash donations as part of a State's expenditures for which FNS will reimburse 50 percent [7 CFR 277.4 (c) & (d)]. However, a waiver

is permissible, when certain assurances are provided. See Appendix C, section A.3 for information on private cash donation waivers.

Section G. Signatures (7CFR 272.2)
(Appendix A, Template 7)

The nutrition education plan shall be reviewed and signed by both the State food stamp agency Nutrition Coordinator (or alternatively, the State FSP Director) and a State food stamp agency Fiscal Reviewer prior to submission.

Appendix A:
Optional Report and Plan Templates

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 1. Section A: State Nutrition Education Final Report Summary

(7 CFR 272.2 (i))OMB No. 0584-0083 Expiration 10/31/2010

Section A. Final Report Summary for Projects and Social Marketing-provide the following data for each project and social marketing campaign that took place during the previous year. See page 7 -9 for instructions.

Section A. State Summary of Projects. **FY_____**
A project is a discrete unit of nutrition education intervention at the local level.

Project Name	Delivery Locations		Audience		Methods	Content		Evaluation
	Geographic Area (Statewide or counties reached)	Delivery Sites (type and number)	Targeted Audience	Total No. of Participants (estimated, unduplicated count)	Frequency, Duration and Type of Educational Methods	Key Messages	Key Measures	Type and Status
(Example) FSNE Parent Project	*County A, County B*	*15 Schools*	*Mothers of elementary school children*	*300*	*6 30-minute group classes, 6 mailed newsletters*	*Be a role model: eat breakfast with kids.*	*# of attendees in each class*	*Process-completed 9/30/2_ _ _*
1.								
2.								
3.								

Based on the above, briefly discuss the outcomes and effectiveness of the projects and how the program can be improved in the upcoming FY.

*For evaluation type, indicate Formative, Process, Impact, Outcome or None.

Appendix A. Template 1. Section A: State Nutrition Education Final Report Summary (cont.)
(7 CFR 272.2 (i)) OMB No. 0584-0083 Expiration 10/31/2010

Section A. State Summary of Social Marketing Campaigns. **FY _____**

Social Marketing is defined as a disciplined, consumer-focused, research-based process to plan, develop, implement and evaluate interventions, programs and multiple channels of communications designed to influence the voluntary behavior or a large number of people in the target audience. (Adapted from Alan Andreasen 1995 and Social Marketing Division of Society for Nutrition Education.)

Title	Location		Audience		Methods	Content		Evaluation
Name of Campaign	**Geographic Area (Statewide or counties reached)**	**Length of Campaign (months)**	**Targeted Audience**	**Total No. of Persons Reached (estimated)**	**Primary Activities (campaign materials design, radio PSAs, bus wraps, point of sale advertising, etc.)**	**Key Mes-sages**	**Key Perfor-mance Measures**	**Type* and Status**
(Example) *FSNE Fruit and Vegetable Campaign*	*Any town*	*12 months*	*Adult females in FSP households*	*5,000*	*Materials development, transit ads, community events*	*Eat more fruits and veggies.*	*Increased purchase of fruit and veggies.*	*Outcome-completed 3/22/2_ _ _*
1.								
2.								

Based on the above, briefly discuss the outcomes and effectiveness of the campaigns and how the program can be improved in the upcoming FY.

*For evaluation type, indicate Formative, Process, Impact, Outcome or None.

Appendix A. Template 1. Section B: State Nutrition Education Final Report Summary FY ____

(7 CFR 272.2 (i)) **OMB No. 0584-0083 Expiration 10/31/2010**

Section B. Final Report Summary for Impact Evaluations.

Provide the information requested below for any significant evaluation efforts (generally considered as costing greater than $400,000) that were completed during the previous year.
See pages 7-9 for instructions.

1. Name of Project or Social Marketing Campaign

If multiple projects or campaigns were part of a single impact evaluation, please list them all.

2. Key Evaluation Impact(s)

Identify each impact being assessed by the evaluations. For example are FSNE participants more likely than non-participants to report they intend to increase their fruit and vegetable intake? Or do a greater proportion of FSNE participants choose low-fat (1% or fat-free) milk in the school cafeteria compared to non-participants?

3. Evaluation participants.

Describe the population being evaluated and its size. For example, all (1200) kindergarten students at public schools in one school district.

Appendix A. Template 1. Section B: State Nutrition Education Final Report Summary FY_____

(continued)

4. Assignment to intervention and control or comparison conditions

a. Describe the unit of assignment to intervention and control groups.
For example, an intervention focused on kindergarten students may assign school districts, individual schools, classrooms, or individual student to intervention and control groups.

b. Describe how assignment to intervention and control groups was carried out.
Be explicit about whether or not assignment was random. For example, ten kindergarten classrooms were randomly assigned to intervention and control groups.

c. Describe how many units and individuals were in the intervention and control groups at the start of the intervention.

Appendix A. Template 1. Section B: State Nutrition Education Final Report Summary FY _____

(continued)

5. Impact Measure(s)

For each evaluation impact, describe the measure(s) used. Descriptions should indicate if the focus is on knowledge, skills, attitudes, intention to act, behavior or something else. Each measure should also be characterized in terms of its nutritional focus, e.g. low fat food preparation, number of whole grain servings consumed, ability to accurately read food labels. Finally indicate if impact data were collected through observation, self-report, or another method.

a. Describe the points at which data were collected from intervention and control group participants.

For example, these points may include pre-test or baseline, midway through the intervention, post-test as intervention ends or follow-up some weeks or months after the intervention ends.

6. Results

Compare intervention and control groups at each measurement point, by individual measure. Report the number of intervention and the number of control group participants measured at each point. Describe any tests of statistical significance and the results.

7. Reference

Provide a contact for additional details and a reference to any other report of the evaluation.

Public reporting burden for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 2: FY _____Nutrition Education Plan Proposed Projects

Section A. Identifying and Understanding the Target Audience
(7 CFR (272.2 (e)) OMB No. 0584-0083 Expiration 10/31/2010

Refer to pages 9-14 for instructions.

NEEDS ASSESSMENT METHODOLOGY & FINDINGS

Needs Assessment Methodology

Describe and justify your methodology for assessing the needs of Food Stamp Program eligibles in your State.

1. Existing Information (source, content, time frame):

2. New Information Collection (source and content):

Needs Assessment Findings

1. **Demographic Characteristics of Food Stamp Program Eligibles in *[Your State]***
   If information is available, discuss geographic location, race/ethnicity, age, gender, family composition, education, and primary language. Reference the source(s) of any data described.

Appendix A. Template 2: FY _____Nutrition Education Plan Proposed Projects (continued)

2. **Nutrition-Related Behavioral And Lifestyle Characteristics Of Food Stamp Program Eligibles In** *[Your State]*
   If information is available, discuss implications of dietary and food purchasing habits and where and how food stamp eligibles eat, redeem food stamp benefits, live, learn, work, and play in your State. Cite sources of information.

3. **Other Nutrition-Related Programs Serving Low-Income Persons In** *[Your State]*
   Discuss the availability of other nutrition-related programs, services, and social marketing campaigns (i.e., EFNEP, Child Nutrition services, etc).

4. **Areas Of** *[Your State]* **Where Food Stamp Program Eligibles Are Underserved Or Have Not Had Access To FSNE Previously**

5. **Implications of Your Needs Assessment And How These Findings Were Applied To This Current Year's FSNE Plan**

Appendix A. Template 2: FY _____ Nutrition Education Plan Proposed Projects (continued)

Section B: State FSNE Goals, Objectives, Projects, Campaigns, Evaluation, and Collaboration (7 CFR (272.2 (e)) OMB No. 0584-0083 Expiration 10/31/2010

Refer to pages 14-20 for instructions.

1. **STATE LEVEL GOALS & OBJECTIVES**

   Based on your needs assessment and the current availability of other nutrition education services, identify your State's goals and objectives for FSNE. Make sure your objectives are specific, measurable, appropriate, realistic, and time specific.

   a. **State Level Goals**

   b. **State Level Objectives**

2. DESCRIPTION OF PROJECTS/INTERVENTIONS FOR EACH PROJECT THE FOLLOWING INFORMATION SHOULD BE PROVIDED:

Project Title:_____

a. **Related State Objectives.**

Specify the objectives that the project/intervention supports.

b. **Audience.**

Specify the audience category as explained in Section A: Identifying and Understanding the Target Audience and other relevant characteristics of the proposed audience (e.g., age, gender, etc.).

c. **Focus on FSP Eligibles.**

Describe how the project will focus education on FSP eligibles.

d. **Project Description.**

Note how you will implement the project, giving particular attention to: how and where it will be delivered, its duration, the projected number of participants, the frequency of contacts (number of classes, mailings, billboards, etc.), and key educational messages.

e. **Summary of Research.**

Provide a brief summary of existing research supporting the feasibility and effectiveness of your nutrition education methods.

f. **Modification of Project Methods/Strategies.**

Provide justification for adapting or changing an identified intervention/project method or strategy. Compared to previous delivery and/or intervention described in cited research

g. **Use of Existing Educational Materials.**

Give the title, author and description of existing educational materials that will be used in the delivery of the project/intervention. Specify the language(s) in which the materials will be used including English. Indicate whether the materials will be purchased and justify the need and cost.

h. **Development of New Educational Materials.**

Identify any new materials that you plan to produce or purchase and justify the need and cost.

i. **Key Performance Measures/Indicators**.

List the key measures/indicators of implementation or performance that you will capture or collect. An example of an implementation measure is the number of PSAs delivered in each media market during the intervention. One associated performance indicator might be the percent of people in a media market who report hearing the message.

Appendix A. Template 2: FY_____Nutrition Education Plan Proposed Projects (continued)

3. EVALUATION PLANS

Describe any evaluation planned. For each evaluation, please indicate:

- *the name(s) of each project(s) that will be a part of this evaluation;*
- *the type of evaluation as primarily a formative, process, outcome or impact assessment;*
- *the questions(s) that will be addressed and;*
  - *the approach to conducting the evaluation, including scope, design, measures and data collection;*
  - *plans for using the results*
- *if the project has been evaluated previously, note the most recent year in which the evaluation was done.*

4. COORDINATION EFFORTS

Describe efforts to coordinate, complement and collaborate with other programs in order to deliver consistent behavior-focused nutrition messages and more comprehensive interventions. Describe your involvement with the State Nutrition Action Plan (SNAP) initiative in your State. Outline any tasks in the SNAP process that FSNE will lead or conduct during the FY. Attach written agreements as specified on page 20.

Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 3: Nutrition Education Plan Staffing

(7 CFR (272.2 (d) (2) (i)) OMB No. 0584-0083 Expiration 10/31/2010

Section C. Staffing

See page 20-21 for detailed instructions on completing this template. Provide the following summary by Food Stamp Nutrition Education (FSNE) project for all paid staff in the budget. Provide the Full Time Equivalents (FTE), describe staff responsibilities as they relate to FSNE and note the funding amounts that will be paid by State and/or Federal funds.

Project Name:

1.Position Title*	2. FTEs** charged to FSNE	3. Description of Job Duties		4. Total FSNE Salary, Benefits and Wages		
*Attach statement of work listing FSNE-related job duties for each position.	**Attach definition of FTE and basis for calculations.	Percentage of FSNE Time spent on Management/ Administrative Duties	Percentage of FSNE Time spent on Direct FSNE Delivery	State/Other Dollars	Federal Dollars	Total (State/other + Federal) Dollars
			Totals			

Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 4: Nutrition Education Plan Budget Summary for Sub-Grantees

Section D. Budget Summary OMB No. 0584-0083 Expiration 10/31/2010

See pages 21-22 for additional instructions on completing this template. Refer to Appendix C for additional information on allowable costs.

1. CONTRACTS/GRANTS/AGREEMENTS FOR NUTRITION EDUCATION SERVICES

Provide this information for each contract, grant, or agreement.

a) **Name of sub grantee**

b) **Total Funding (Federal and non-Federal) for contract, grant, or agreement**

c) **Federal funding requested**

d) **State and other non-Federal funding provided and source in terms of cash and in-kind sources**

e) **Description of services and/or products**

f) **Cost of specific services and/or products**

2. PROJECT COSTS

For each sub-grantee, provide the State and Federal cost for each planned nutrition project. Provide a detailed breakdown that includes, at a minimum, the information contained on the following table.

Appendix A. Template 4: Nutrition Education Plan Budget Summary (continued)

2. BUDGET INFORMATION BY PROJECT

Sub-grantee Name (if applicable):

Project Name:

Expenses*	(a) Non-Federal Public Funds Cash	In-kind Donations	(b) Non-Federal Non-Cash	(c) Total Non-Federal	(d) Federal Funds	Total Funds (c+d)
1. Salary/Benefits						
2. Contracts/Grants/Agreements**						
3. Non-Capital Equipment/Supplies						
4. Materials						
5. Travel						
6. Administrative						
7. Building/Space						
8. Maintenance						
9. Equipment & Other Capital Expenditures						
10. **Total Direct Costs**						
11. Indirect Cost***						
12. Total Costs						

***Provide narrative describing all expenses.**
****Attach copies of interagency agreements to support line 2.**
*****Provide assurance that the indirect cost rate is an approved rate (see Appendix C, Section A.2).**

Appendix A. Template 4: Nutrition Education Plan Budget Summary (continued)

3. TRAVEL (7CFR 277 (OMB Circular A-87)) OMB No. 0584-0083 Expiration 10/31/2010

Travel expenditures are a variable cost. In order to be considered for funding, the request should provide a direct and clear link to providing quality nutrition education for food stamp eligibles. Provide the following information for all travel included in your FSNE budget:

3. In-State Travel

i. **Travel Purpose**
- **How attendance will benefit FSNE program goals and objectives**
- **Justification of need for travel**
- **Travel Destination (city, town or county or indicate local travel)**
- **Number of Staff Traveling**
- **Cost of Travel for this Purpose**

ii. **Total In-State Travel Cost**

4. Out-of-State Travel

iii. **Travel Purpose and/or Name of Conference**
- **How attendance will benefit FSNE program goals and objectives**
- **Justification of need for travel**
- **Travel Destination (city and state)**
- **Number of Staff Traveling**
- **Cost of Travel for this Purpose**

iv. **Total Out-of-State Travel Cost**

Note: Total Travel Cost (In- and Out-of-State) per project to be entered as line 5 of budget summary (Template 4).

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 5: Nutrition Education Plan Assurances

(7 CFR (272.2 (d) (2) (iii)) and OMB No. 0584-0083 Expiration 10/31/2010

Section F.

To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education plan shall include the following assurances. Mark your response to the right.

	YES	NO
1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight to any sub-grantees. The State food stamp agency is fiscally responsible for nutrition education activities funded with Food Stamp Program funds and is liable for repayment of unallowable costs.		
2. Efforts have been made to target FSNE to FSP participants and eligibles.		
3. In cases where Food Stamp Nutrition Education projects may inadvertently benefit persons that are ineligible for the Food Stamp Program because it is not practical or possible to meet the exclusivity requirement, the State has submitted approved waivers for each project. To be approved, the waiver request(s) shall (7CFR 272.3) clearly demonstrates how the proposed project provides a good means of reaching food stamp eligibles and documents that at least 50 percent of those reached will have gross incomes at or below 185 percent of the poverty thresholds or guidelines.		
4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) are claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional food stamp eligibles or to provide additional education services to EFNEP clients who are eligible for the Food Stamp Program. Activities funded under the EFNEP grant are not included in the budget for FSNE.		
5. Cash or in-kind donations from other non-Federal sources to Food Stamp Nutrition Education have not been claimed or used as a match or reimbursement under any other Federal program		
6. Costs incurred by other State and/or local agencies for goods and services for Food Stamp Nutrition Education and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not used as a match under any other Federally funded project.		
7. Documentation of State costs, payments, and donations for approved Food Stamp Nutrition Education activities are maintained by the State and will be available for USDA review and audit.		

To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education plan shall include the following assurances. Mark your response to the right.

	YES	NO
8. Contracts are procured through competitive bid procedures governed by State procurement regulations.		
9. Program activities are conducted in compliance with all applicable Federal laws, rules, regulations including Civil Rights and OMB circulars governing cost issues.		
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.		
11. Program activities are reasonable and necessary to accomplish Food Stamp Nutrition Education objectives and goals.		
12. All materials developed or printed with Food Stamp Nutrition Education funds include the appropriate USDA non-discrimination statement, credit to the Food Stamp Program as a funding source, and a brief message about how the Food Stamp Program can help provide a healthy diet and how to apply for benefits.		
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage or commodity.		

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A: Template 6: Waiver Request Outline (7CFR 272.3)

Operating Guidelines, Forms, Waivers OMB No. 0584-0083 Exp. 10/31/2010

Refer to pages 53-55 for additional instructions regarding waiver requests.

1. Waiver serial number:
Enter the waiver number if one was assigned in previous correspondence. The waiver serial number should be used in all correspondence regarding the waiver.

2. Type of request:
Enter "initial" if the State agency is requesting the waiver for the first time or "extension" if the waiver has been approved previously. Enter "modification" if the State agency is requesting a change to a previously approved waiver. Enter "reconsideration" if the State agency is requesting that the denial of a previous request be reexamined.

3. Primary regulation citation:
Identify the specific section of 7CFR for which the waiver is requested. Contact the regional office if there is any question regarding the citation.
For exclusivity waivers the citation is 7CFR 272.2(d) (2) (iii).
For cash donation waivers the primary citation is: 7 CFR 277.4(c)

4. Secondary regulation citation:
Some proposals will require a cross-reference to another section of the regulations. For example, a waiver to count income in the month it is intended to cover, rather than the month of receipt, may relate to both 7 CFR 273.10 and 7 CFR 273.21. However, if the proposal requires waivers of two unrelated regulatory provisions (for example, to extend certification periods and also substitute a telephone interview for a face-to-face interview), two separate waiver requests and two primary regulation citations are needed.
There is no secondary citation for exclusivity waivers.
The secondary citation for private cash donation waivers is: 7 CFR 277.4(d).

5. State:

6. Region:

7. Regulatory requirements:
Describe the requirement that is to be waived. For example, 7 CFR 273.21(c) requires the State agency to have a toll-free number or accept collect calls.

Appendix A: Template 6: Waiver Request Outline (continued)

8. Proposed alternative procedures:
Describe in detail the procedures the State agency plans to follow in lieu of the regulatory requirement. For exclusivity waivers describe how Food Stamp Nutrition Education will be delivered to FSP eligibles in a way that may also inadvertently benefit persons that are ineligible for the FSP. Provide the location of the project (e.g., school, congregate meal site, etc.) and describe the audience that will receive FSNE. Indicate the projected number of people the intervention will reach, estimated number of total contacts and the number or percentage of total contacts that will be with FSP eligibles. The request shall also indicate how the project will offer an educational message about the FSP, its benefits, and how to apply.

9. Justification for request:
Explain the purpose of the waiver and how it meets the approval criteria of the regulations. For exclusivity waivers, States shall document that:

- *It is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences because it is not possible or practical to identify FSP eligibility or to specifically provide FSP eligibles with nutrition education without reaching others.*

- *The project provides an efficient and effective means of reaching FSP eligibles.*

- *At least 50 percent of the population that will receive FSNE has gross household incomes that are at or below 185 percent of the poverty guidelines or thresholds or the setting is a high volume FSP authorized retail grocer with average monthly FSP redemptions of $50,000 or more over a 12-month period. Reference data sources.*

10. Anticipated impact on households and State agency operations:
Describe the effect the waiver is expected to have on households in terms of quality or timeliness of service, any administrative or Program savings, and any adverse effect on households or the State agency if the waiver is not granted.

Appendix A: Template 6: Waiver Request Outline (continued)

11. Caseload information, including percent, characteristics, and quality control error rate for affected portion:
Provide detailed information regarding the percent of the total caseload which would be affected by the waiver, whether the households are prospectively or retrospectively budgeted, monthly reporters or change reporters, elderly or disabled, and other relevant information. Provide the latest quality control information available for the type of household affected. For example: "Pure SSI households constitute 15 percent of the caseload and have an error rate of 7 percent."

12. Anticipated implementation date and time period for which waiver is needed:
Indicate the State agency's time frame for putting the waiver into effect and the period for which the waiver is requested.

13. Proposed quality control review procedures:
Describe the effect the waiver is expected to have on quality control review procedures. If applicable, provide detailed review procedures to be used in lieu of procedures in the FNS Handbook 310.

14. Signature and title of requesting official:
Type the requesting official's name and title and leave sufficient space for the stamped signature. The date will be date-stamped on line 15.

15. Date of request:
Date stamp with the date the request is signed.

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 7: Nutrition Education Plan Signatures

Section G: Signatures (7CFR 272.2) OMB No. 0584-0083 Expiration 10/31/2010

FOOD STAMP PROGRAM

Annual Plan for Nutrition Education

for

STATE AGENCY: _____

DATE: _____

FY _____

Certified By:

_____ _____

STATE FOOD STAMP AGENCY NUTRITION COORDINATOR or STATE FOOD STAMP AGENCY DIRECTOR — DATE

Certified By:

_____ _____

STATE FOOD STAMP AGENCY FISCAL REVIEWER — DATE

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research, Nutrition and Analysis, Alexandria, VA 22302 (0584-0083*). Do not return the completed form to this address.

Appendix A. Template 8: Sample Time and Effort Documentation

Refer to Appendix C, Section A.10 for instructions on time and effort documentation.

OMB No. 0584-0083 Expiration 10/31/2010

Time and Effort Documentation for hours worked specifically on

Food Stamp Nutrition Education

Name_____ **Location**_____ **Title/Position**_____

Month:	
Day	**Hours Worked**
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Month:	
Day	**Hours Worked**
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Month:	
Day	**Hours Worked**
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
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30	
31	

Month's Total:

Employee signature & date:_____

Supervisor signature & date:_____

Quarter Total:

Adapted from Wyoming form, May 2003.

Appendix B:
Reporting and Record Retention Requirements

Form 366A-State Agency (7CFR 272.2) OMB No. 0584-0083 Expiration 10/31/2010

In addition to submitting the nutrition education plan, State agencies shall submit FNS-366A, Budget Projection Statement, for FNS approval. State agencies shall report their projected requested Federal funding for nutrition education on FNS Form FNS 366A, line 17, Nutrition Education. This report is due August 15th in the FNS Regional office for the upcoming Federal FY.

Form SF-269-State Agency (7CFR 277 (OMB Circular A-87)) OMB No. 0584-0067 Expiration 10/31/2008

The State agency shall report nutrition education expenditures, in Column 17-Nutrition Education- on FNS Form SF-269. This report is to be submitted quarterly, 30 days after the end of each quarter. A final report is due 90 days following the end of the Federal fiscal year.

Record Retention and Management-State Agency and All Sub-grantees (7CFR 272.2)

FSP regulations require that all records be retained for three years from fiscal closure. This requirement applies to fiscal records, reports and client information. Supporting documentation may be kept at the sub-grantee level, but shall be available for review for three years from the date of quarterly claim submittal. Any costs that cannot be substantiated by source documents will be disallowed as charges to the FSP.

Appendix C:
Cost Policy

The following discusses the costs that can be approved for Federal reimbursement under an approved FSNE Plan.

Food Stamp Program Reimbursement Structure

Under Section 16 of the Food Stamp Act of 1977, as amended, a State food stamp agency is reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved nutrition education activities. Because State costs, by law, are reimbursed, FSNE is not a "grant" program, which provides a set level of funding for specific activities for a specific period of time, nor is it technically a match program. It reimburses 50 percent of States' allowable expenditures. Nevertheless, the term "grantee" is used in this guidance to denote the State agency, and the term "sub grantee" is used to denote those entities that are under agreement with the State agency to provide services. Despite the use of this nomenclature, it is important to understand that the food stamp program operates as a reimbursable agreement. Federal funds reimburse States for only half of all allowable costs.

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 5% or by greater than or equal to $100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary (see State Plan Amendments page 4).

While plan budgets are approved on an annual basis, allowable costs may be reimbursed in the subsequent year if the activity overlaps fiscal years or if payment for services delivered during the fiscal year was delayed. Nutrition education project obligations shall be established in the fiscal year the funds are appropriated but disbursements against these obligations may occur after the fiscal year closes. Federal reimbursement is subject to the availability of Federal funds. State agencies have a two year deadline to claim prior year costs. Expenditures shall be submitted within two years after the calendar quarter in which the State (or local) agency incurred the cost (7CFR 277 (OMB Circular A-87)).

Allowable Costs

Allowable costs are specified under OMB regulations at 2 CFR part 225 (OMB Circular A-87), 2 CFR 220 (OMB Circular A-21), 2 CFR 215 (OMB Circular A-110) and 2 CFR 230 (OMB Circular A-122), Departmental rules at 7 CFR 3016 and FSP rules at 7 CFR 277. To be allowable, all costs charged to FNS shall be valid obligations of the State, local government or sub-grantee and shall be necessary and reasonable as charges under an approved FSNE plan.

State Plan Amendments

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 5% or by greater than or equal to $100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary. In these instances, a State shall submit a plan amendment for Federal approval prior to incurring the expenses to ensure that costs are allowable, reasonable and necessary. Further, if the scope of the activities in a plan changes, regardless of the impact on the planned expenditures, a State shall submit a plan amendment for FNS approval (7CFR 277 (OMB Circular A-87)). See instructions regarding plan amendments on page 4.

A. Allowable and Unallowable Administrative Expenses (7CFR 277 (OMB Circular A-87))

Allowable administrative costs are operational costs for FSNE, which include all administrative expenses that are reasonable and necessary to operate approved nutrition education activities. Allowable administrative expenses include:

- salaries and benefits of personnel involved in FSNE and administrative support;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of FSNE materials when no other appropriate materials exist (see pages 15-18);
- lease or rental costs;
- maintenance expenses;
- other indirect costs;
- and charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

Unallowable administrative expenses- Unallowable costs per 2 CFR 225 (OMB Circular A-87) and 2 CFR 220 (OMB Circular A-21) for State and local governments are listed below. Similar lists are found in 2 CFR 215 (OMB Circular A-110) and 2 CFR 230 (OMB Circular A-122), the OMB regulations applicable universities and non-profit organizations).

- Bad Debts-uncollected accounts or claims, and related costs.
- Contingencies-contributions to an emergency reserve or similar provision for unforeseen events (these are not insurance payments which are allowable).
- Contributions and Donations (usually these are political in nature).
- Entertainment-costs that are primarily for amusement or social activities. (This is actually one with a lot of exceptions. For example, meals are cited in the OMB regulations but within the context of training meals might be allowable. There are a number of costs here that require a "reasonable judgment" based on why or when the activity takes place.)
- Fines and Penalties-violations or penalties for failure to comply with Federal, State, or Local laws.
- Governor's Office-specifically costs of general government. Costs which may be directly charged to a Federal grant may be allowable. (For example, if a person assigned to the governor's office devotes 100 percent of his/her time to the FSP, the cost may be allowable. Each situation, however, shall be judged on its own merit).

- Indemnification-payments to third parties and other losses not covered by insurance.
- Legislative Expenses.
- Losses Not Covered by Insurance (See Indemnification above. These costs are similar, but not the same).
- Under Recovery of Costs under Federal Funding Agreements-shortfalls in one grant cannot be charged to another Federal grant. (This is not the same as charging two Federal grants for a share of the costs of the activity if both agencies benefit from the activity funded. However, an allocations basis shall be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic Beverages.

Under 2 CFR 220 (OMB Circular A-21), there are some *unallowable cost* categories in addition to those listed above:

- Advertising and Public Relations- Unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant.
- Alumni Activities.
- Commencement and Convocations.
- Legal Fees Which Result From a Failure to Follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive Lobbying.
- Goods and Services for Private Use.
- Housing and Personal Living Expenses.
- Interest, Fund Raising, and Investment Management- (For interest, there are exceptions. But if the cost is shown it needs to be examined in light of the exceptions.)
- Any and All Political Party Expenses.
- Pre-agreement Costs- All costs incurred prior to the grant award.
- Scholarships and Student Aid-(There are exceptions which should be reviewed if these costs appear in budget.)
- Student Activity Costs.
- Travel-Allowable but with restrictions as to amounts involved, level of transportation costs (e.g., no first class tickets).

***Reasonable and necessary costs* (7CFR 277 (OMB Circular A-87))**

While OMB regulations define what is allowable, costs that may be covered by the FSP for nutrition education shall also meet a "reasonable and necessary" test (7CFR 277 (OMB Circular A-87)).

Reasonable Costs

- Provide a program benefit generally commensurate with the cost incurred
- Are in proportion to other program costs for the function that the costs serve,
- Are a priority expenditures relative to other demands on availability of administrative resources, and
- Carry constructive nutrition education messages consistent with the Dietary Guidelines for Americans.

Necessary Costs

- Are incurred to carry out essential functions,
- Cannot be avoided without adversely affecting program operations, and
- Do not duplicate existing efforts

Note: Remarks in parentheses represent clarification by the Food and Nutrition Service and are not regulatory language.

A.1 Property Procurement and Management (7CFR 277 (OMB Circular A-87))

The State agency and all sub-grantees shall follow procurement requirements found in 7CFR 3016.

The State agency shall receive prior Federal approval before procuring or requesting reimbursement for equipment valued at more than $5,000 per item. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project. Inventory records shall be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

A.2 Indirect Cost Rates (7CFR 277 (OMB Circular A-87))

Indirect cost is a general term for certain types of costs that are incurred by the grantee or sub-grantee in support of other allowable activities that are charged directly to sponsoring Federal or State funding agencies. These indirect costs (also called overhead costs) are determined through a variety of rates or "cost allocation plans" that detail how the costs are to be shared by the funding agencies.

Indirect cost rates are documented through an indirect cost plan, which is approved by a "cognizant agency." A cost allocation plan, also approved by a cognizant agency, is a more extensive plan that combines many different allocations.

Historically indirect cost plans were reviewed and approved by a "cognizant agency" officially assigned by OMB. Typically OMB assigned cognizance to the Federal funding agency that had the largest dollar amount involvement with the specific grantee. Within that agency there was an office known as the Division of Cost Allocation or DCA. Due to budget cuts, the DCA no longer reviews or approves indirect costs for sub-grantees. Recently, these costs were claimed without any Federal review. FNS has determined that under OMB Circular A-87, the primary grantee (normally the State agency) is responsible

for review of indirect costs submitted by their sub-grantees. This policy is currently implemented by other Federal agencies, including the Department of Education, Department of Labor, and the Department of Health and Human Services.

FNS will accept indirect costs established through an indirect cost plan approved by the appropriate State agency. We retain the right to review any and all such plans. In the event a State agency has approved a plan, which is determined to be unacceptable, indirect costs charged through that plan may be disallowed.

If a cost can be directly attributed to one grant, then that cost may not be included in either an indirect cost plan computation or any cost allocation plan. Indirect cost rates are normally computed through a process where all indirect costs are added together and then divided by the Modified Total Direct Costs. This results in a percentage which is applied to each grant as their share of the indirect or overhead costs. For example, if indirect costs total $16,000 and the Modified Total Direct Costs total $100,000, then the indirect cost rate would be 16%. Each grant would then be charged 16% of the total direct costs chargeable to that grant. In a cost allocation plan, usually meant for a larger grantee, various costs are pooled and then allocated to the various grants operated. Indirect costs may be claimed by grantees for the cost of activities operated by sub-grantees. This would result in two indirect cost rates being applied to the grant. In most cases, the rates are restricted to the first $25,000 of any flow through grants or contracts. This is provided for in the construction of the Modified Total Direct Costs used in development of the indirect cost rates.

If a grantee has an approved indirect cost plan or cost allocation plan, they should note the indirect cost rate agreement in their State's Nutrition Education Plan. FNS may request documentation in support of the submitted indirect cost rate. The State agency should ensure that documentation from either the Federally assigned cognizant agency or the State review process will be available for FNS review if requested.

FNS will accept indirect cost rates for colleges and universities that have been approved by the appropriate cognizant entity. Unless justification is provided, only the off-campus rates may be used. If additional categories such as "other sponsored activities" are covered, FNS will not accept "instructional rates" without justification. In most FSNE Plans, only one rate may be used for each program charged. As a result, any justification for using either the "on-campus" or "off-campus rate" should be based on where the majority of the allowable activities take place. In the case of FSNE, the allowable activities are defined as those activities that provide nutrition education to the FSP eligible population. Other activities, such as research and data analysis, are not the primary purpose of FSNE and should not be used in determining where the majority of the activities take place. Indirect costs at colleges and universities are limited to 26% of total modified direct costs, based on 2 CFR 220 (OMB Circular A-21).

Small local agencies may not have staff with the expertise to develop indirect cost rates. Local agencies that do not have a cognizant agency to review and approve their rates may apply to the State agency for approval to use a rate developed either by or for the local agency. They may obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs and may be included in the Plan budget as either direct or indirect costs. Only the proportionate share of the costs of developing the indirect cost rate may be charged to FNS. The State agency

should indicate, within the FSNE plan, its acceptance of the indirect cost rate. The FNS Regional office may accept or reject use of the rate based on the rate computation documents. If the State agency does not accept the responsibility for approving the indirect cost rate, or disapproves the rate, the FNS Regional Office will not accept the rate.

State agencies are responsible for ensuring that indirect costs included in the State FSNE Plan are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement.

A.3 Waivers (7CFR 272.3)

Exclusivity Clause Waivers. FSNE is exclusively for the benefit of individuals that are eligible for the FSP. The term "food stamp eligible" is defined in Appendix D and is discussed in detail on pages 9-14. This policy is consistent with language in the Food Stamp Act, as amended (7 USC 2011, Section 11 (f) (1)). State agencies shall target their programs to FSP eligibles. However, they may pursue an "exclusivity waiver" on a project basis to allow certain projects that inadvertently reach other low-income individuals that are not eligible for the FSP. "Project" is defined in Appendix D as "a discrete unit of nutrition education intervention at the local level with a specifically identified low income target population". General instructions for completing the waiver request are provided in Appendix A, Template 6. In addition, States requesting a waiver of the exclusivity regulation for FSNE activities shall document, on a project basis, that:

- It is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences because it is not possible or practical to identify FSP eligibility or to specifically provide FSP eligibles with nutrition education without reaching others (e.g., social marketing campaigns and media communication).

- The project provides an efficient and effective means of reaching FSP eligibles. The waiver shall indicate the projected number of people the intervention will reach, estimated number of total contacts and the number or percentage of total contacts that will be with FSP eligibles.

- The project will offer an educational message about the FSP, its benefits, and how to apply.

- Documentation is provided to ensure that one of the two following conditions is met:

    1. At least 50 percent of the population that will receive FSNE has gross household incomes that are at or below 185 percent of the poverty guidelines or thresholds. In developing data for waiver requests, the following data may be used to calculate the extent to which the population meets the income criteria:

        - FSP, FDPIR and TANF participation data;
        - census tract information;
        - other community program participation data;
        - school lunch free and reduced price data; and
        - WIC participation data.

Asking individuals for personal income data is not an appropriate means to determine whether the target audience is low income, and goes beyond the scope of data needed for waiver purposes. Some potential sources of information include:

- State FNS Program Offices
- American FactFinder provided by the U.S. Census Bureau at http://factfinder.census.gov
- Food Stamp Program Map Machine by the Economic Research Service at http://ers.usda.gov/Data/FoodStamps/
- Common Core Data-School Meals by the National Center for Education Statistics at http://nces.ed.gov/ccd/

2. The setting is a retail grocer that redeems on average over 12 months at least $50,000 monthly in FSP benefits. FNS regional office will verify this threshold as a condition of approval for a State plan.

Documentation to show that each project meets these criteria shall be submitted in one or more waiver requests. States may submit a separate waiver request for each project or they may submit a listing of local projects for which they are seeking waivers. Statewide waivers are not permissible. The waiver request shall contain project-specific information and supporting documentation in sufficient detail to ascertain that each project is targeted to FSP eligibles. Each waiver request will be approved or denied separately, regardless of format, on the basis of supporting documentation.

Exceptions to Requirement for Exclusivity Clause Waivers

Table I (see pages 10-12) provides examples showing when a waiver may or may not be needed. The following summarizes exceptions to the requirement for Exclusivity Clause Waivers:

1. Food Distribution Program on Indian Reservations (FDPIR). Because persons eligible for the FSP may participate in FDPIR in lieu of the FSP, FDPIR participants may be targeted for FSNE without waiver, and will be considered as if participating in the FSP.

2. Projects serving Categorically Eligible Persons. Persons eligible for the FSP by virtue of their allowable categorical eligibility consistent with FSP regulations at 273.2(j) may be targeted for FSNE without waiver.

3. Projects serving persons with incomes less than or equal to 130% of the poverty guidelines. This income level may be considered a reasonable proxy for FSP eligibility in the case of FSNE participation in most cases. This proxy does not apply to persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C).

4. Projects serving persons receiving FSNE at FSP/TANF offices, public housing and food banks, food pantries or soup kitchens (when food is being distributed to needy persons as described on page 10). A waiver is not required for nutrition education delivered at these venues under the circumstances specified (for food banks, food pantries, and soup kitchens).

Use of Private Cash Donation Waivers. FSP regulations at 7 CFR 277.4 prohibit the consideration of private in-kind donations as well as private cash donations as a part of a State's expenditures for which FNS will reimburse 50 percent. No waiver is available for private in-kind donations. However, a waiver is permissible for private cash donations to the State agency when four conditions are met:

1. No endorsements of donors or products will be given in connection with the nutrition education activities.

2. No funds will revert back to donor or benefit the donor.

3. Funds are donated without restriction on use for a specific person, institution, or facility.

4. Funds are to be under the State's administrative control.

Only cash donations to the State from third parties that are not operating under a formal agreement with the State to provide local FSP services are considered to be relevant to this section of the regulations. To use donated funds for FSP purposes, the State shall use the funds for reasonable and necessary program expenditures with an approved waiver from FNS. Assurances that the above conditions are met shall be included in the State agency's waiver request and noted in the nutrition education plan.

Funding held by a subgrantee of the State under contract to deliver FSP services locally, such as nutrition education services, is not considered to be private cash and need not be "donated" to the State in order to be expended for FSP purposes or Federally reimbursed. Rather, this funding is a financial resource of the subgrantee. Consistent with the State plan, the subgrantee may spend the cash it holds on approved nutrition education activities, and submit it's billings to the State, at which point, the State may reimburse the subgrantee for 50 percent of the subgrantee's expenses. Therefore cash donations to a local entity are simply revenue of that local entity and do not require a cash donation waiver.

Cash donation waivers shall specify who is donating cash to the State and the amount of the donation. General blanket waivers requesting prior approval in the event the State receives a private cash donation are not allowed. General instructions for completing the waiver request are provided in Appendix A, Template 6.

A.4 In-kind Donations Not Involving Transfers of Cash (7CFR 277 (OMB Circular A-87)).

1. In-kind donations that are the value of volunteer time or other non-billable goods or services (e.g., there is no cash transfer between parties) are not allowable as charges to this grant if they are provided to or by a non-governmental agency or sub-grantee.

2. In-kinds from government agencies cannot be charged to another Federal grant.

3. Goods and services requiring a transfer of cash *are not* in-kinds. However, goods and services that require a cash reimbursement by the sub-grantee may be charged as a cost, providing the cash reimbursement is based on a legally enforceable contract or agreement between the grantee and sub-grantee. An obligation to pay shall exist for a sub-grantee to

have a valid claim. FNS will then reimburse 50% of the outlay incurred by the grantee or sub-grantee.

4. A grantee (the State agency) or sub-grantee cannot claim a donated service or a good as an in-kind if:
    a) It is not allowable, reasonable, or necessary for the delivery of FSNE;
        1) 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.
        2) 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 a FSNE volunteer is 18 years of age.
    b) Payments are made by the State agency or sub-grantee for any of the goods and services (payments are actual outlays rather than in-kinds); or
    c) The sub-grantee claiming the in-kind is a private organization. As specified under 7 CFR 277.4(e), only public agencies are allowed to claim in-kind charges. Because the value of in-kind donations including volunteer services to a private entity (private schools, churches, non-governmental entities, etc.), do not represent any State expenditure or outlay, FSP regulations do not permit them to be considered as a cost to the program and thus are not reimbursable.

5. A grantee or sub-grantee may claim a service or a good as an in-kind if:
    a) It is allowable, necessary, and reasonable for the delivery of FSNE.
    b) The sub-grantee claiming the "in-kind" is a public organization as specified under 7 CFR 277.4(e). These regulations were written in the interests of maximizing States' ability to identify allowable funding sources. FNS has allowed for regulatory support to the concept that the donation of goods and services to a public entity result in a de facto State expenditure or outlay. Thus, they are reimbursable. (Note that regulations do not permit extending this interpretation to private organizations).
    c) In valuing a volunteer's time or service to a public organization, the following principles apply:
        1) The volunteer's wages are computed on a reasonable hourly basis in accordance with the duties being performed for FSNE, or wages are computed based on the Federal minimum hourly wage established by the United States Department of Labor;
        2) The volunteer records time as specified in the FSNE Guidance (Appendix C, Section A.10, Time Records); and
        3) The value of the volunteer's time is not being used as a match for any other Federal grant.
    d) In valuing donated goods, the following principles apply:
        1) The value for goods other than publicly owned space is computed on reasonable fair market value;
        2) When valuing space owned by a public agency, depreciation or use allowance is used for cost computations; and
        3) The value is not being used as a match for any other Federal grant.

A.5 Donations from Non-Federal Public Agencies (7 CFR 277.4(c)(d)(e))

As specified under 7 CFR 277.4(c)(d)(e), Federal reimbursement for the costs of services or property donated by other non-Federal public (i.e., government) agencies is allowable provided that the donated costs are not billed or claimed to another Federal program or used to match another Federal program. The State agency shall maintain records or an audit trail to support costs claimed. The claim shall be for FSNE allowable activities.

A.6 Non-Federal Public Agencies (*7 CFR 277.4(c)*)

A non-Federal public agency is an organization of State or local government that is supported by funds derived from general tax revenues (receipts) of a State or locality specifically allocated from appropriate budgetary authority such as a State legislature, county or local government. This would include, for example, State or local government financed educational institutions and State funded hospitals. Funding from non-Federal public agencies serves as the foundation for calculating a State's total costs of FSNE, of which 50 percent is reimbursed with Federal funds.

The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in *7 CFR 277.4(c)*, can be interpreted to include "marketing orders, councils and commissions". OGC concluded that marketing orders, councils, and commissions may be included within the term, "non-Federal public agency" for the purposes of using the donation as part of State cost for Federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they are engaged. To be included as State cost, the budgetary authority shall be delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage shall be governmental in nature. The activities shall affect the right of private parties through adjudication, rule making, investigating, prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

The State agency should describe in the plan the source of the entity's regulatory authority and the nature of the activities in which the entity is engaged. The State agency should also describe the relationship of the entity to the objectives of the proposed nutrition education activity. Funding provided by the marketing order should be used to support objectives of the nutrition education activity benefiting the food stamp households. Marketing orders funding for FSNE should not be used to promote single-commodity nutrition education messages to the exclusion of the overall nutrition education objectives.

A.6.1 Health Care Organizations (*7 CFR 277.4(c)*)

The allowability of this type of partnership for the delivery of FSNE hinges on whether the organization is ***public or private***. The organization's profit or non-profit status is not relevant. FNS has determined that unless an absolute need is documented (i.e. no other FSNE provider is available) participation by non-governmental (private) health care organizations is not reasonable or necessary and should be discouraged. There are four major problem areas associated with using health care organizations as a sub-grantee. These include:

1) A valid determination as to the health care organization's status as public (governmental) or private (non-governmental) is difficult to ascertain. Many public health care organizations are not governmental and this determination is vital since some or all of their funding contribution will be in the form of an in-kind (non-cash) contribution. Only government entities may use in-kind contributions to meet the State or local share of allowable costs.
2) Procurement regulations in some States or counties prevent awarding a contract to a private health care organization without a public notice allowing other health care organizations an opportunity to bid on the work. In addition, once a grantee moves beyond using other governmental services procurement requirements become mandated. These include items such as the method of procurements, dollar limits etc.
3) While the nature of a public health care organization may mean that food stamp participants and eligible households will be involved, the health care organization should still validate that it meets one of the eligible target audience categories described in Table 1 of this Guidance. Additionally, the health care organization should meet the provisions of allowable FSNE activities, which states that health promotion and primary prevention of disease should be the focus and aim of FSNE activities. The disposition of these types of health care organizations already leans towards secondary prevention and medical nutrition therapy, which are not allowable FSNE expenditures.
4) Private (non-profit) health care organizations receive the majority of their funding from Medicare/Medicaid. Activities funded under one Federal grant may not be billed to another Federal grant. Unless the State involved is dedicated in tracking these expenditures, it would be difficult to clearly document costs in this environment.

A.7 Medical Equipment & Clinical Health Assessments (2 CFR 225 (OMB Circular A-87))

FNS has determined, based on 2 CFR 225 (OMB Circular A-87), that medical equipment or health services related to health assessments of recipients, obtaining clinical data on nutritional status, and chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. For example, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to administer dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.8 Gardening (2 CFR 225 (OMB Circular A-87))

Gardening is a beneficial project that leads to the economical production and consumption of healthy and fresh food. The provisions of 2 CFR 225 (OMB Circular A-87) allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. 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 are not allowable FSNE costs. Only educational supplies, curricula and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. (Note that participants may use program benefits (coupons/EBT) to purchase seeds and plants for gardening purposes).

A.9 Valuation of Publicly Owned Space (2 CFR 225 (OMB Circular A-87), 2 CFR 220 (OMB Circular A-21), and 2 CFR PART 215 (OMB Circular A-110))

Charges For Publicly Owned Space-Space owned by a public entity cannot be charged to a Federal grant based on private market rental rates. The entity can only recover the costs of space through a depreciation schedule or use allowance, applicable charges for utilities, maintenance, and general upkeep.

Federal requirements regarding the valuation of publicly owned space is contained in OMB regulations at 2 CFR 225 (OMB Circular A-87), 2 CFR 220 (OMB Circular A-21), and 2 CFR PART 215 (OMB Circular A-110) and Departmental regulations at 7 CFR 3016. The requirements indicate that in no case may publicly owned space be "donated" or billed at fair market rental rates. One allowable method for calculating the value of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space regardless of whether they are direct billed or donated. The cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and utilities. (FNS Policy Memorandum-March 9, 1998)

Example of Calculating Valuation of Publicly Owned Space- Depreciation is dividing the cost of the building over its useful life. For example, if a building cost $50,000 to build and it had a useful life of 20 years, the yearly depreciation would be $2500. This cost is spread over the square footage of the building, resulting in an annual rate per square foot. The FSP share would be the amount of space that is used for the FSP. A use allowance is used when the building is fully depreciated. You are allowed to charge no more than 2 percent of the cost of the building per year. In the example above, States could only charge $1000 per year.

FNS has also developed a standard hourly use allowance that is an optional method for States to use when calculating the cost of publicly owned space.

- .002041 cents per square foot may be used for the cost of space.
- .003265 cents per square foot may be used for the cost of maintenance, and utilities.
- States have the option to use actual cost if available.
- Additional information on these calculations is available in FNS memorandum, "Calculation for Space in Government Owned Buildings for use in Food and Nutrition Service Programs", dated April 11, 2006.

A.10 Time Records (7CFR 277 (OMB Circular A-87))

Weekly time and effort reporting is required by FNS for staff paid through the nutrition education funds and those contributing to this work through cost share. Time and effort reporting is likewise required for volunteers. Additionally, records shall be maintained for third party contracts of less than 100 percent time. 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.

Time records are used to calculate the charges for time spent on allowable activities. The administrative office, which converts hours worked into dollars charged, shall also maintain

accounting records that substantiate the charges incurred. Costs charged based on time and effort reporting would include salaries and fringe benefits for staff employed. These costs should relate to the total accounting documentation maintained by the organization that is asserting the claim.

Staff Devoting 100 Percent of Time to FSNE

- A semi-annual time and effort certification by a supervisor is required.
- After-the-fact reporting is unacceptable.

Staff Devoting Less Than 100 Percent of Time to FSNE

- Time records are required for all nutrition education staff and volunteers devoting less than 100 percent of their time to FSNE unless a Federally approved Random Moments Time Study is used to allocate the time spent on allowable activities. Universities and colleges that are approved for Plan Confirmation by the Department of Health and Human Services are also exempt from the time record requirement.
- Budget sections of State plans should confirm that time records are documented.
- Time worked on FSNE should be reported in hours, and not percentage of time to the project.
- A sample form for keeping time and effort documentation is available in Appendix A (see Template 8). However, States may develop their own form that includes appropriate space to enter hours spent on FSNE, date, and employee and supervisor signatures. Only time spent on FSNE needs to be entered on the form.
- If a University has a procedure for hourly documentation already in place, it may meet the reporting requirement.
- The time and effort forms can be maintained at the work site and shall be available for review/audit for a period of three years.
- Grantees that have Federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities.
- State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS regional office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy of the time estimate. Time records need not be submitted with the plan but should be maintained by the project for audit.

When accounting for the cost of part-time staff, the total cost, including time not worked (annual and sick leave), shall be computed and charged. The official accounting system used for grants and funding arrangements shall be used in calculating this cost so that official accounting records reflect all of the revenue and costs of FSNE. The staff person's time spent on FSNE shall be documented as specified above.

A.11 Memberships, Subscription, and Professional Activity Cost (7CFR 277 (OMB Circular A-87))

Cost of institution memberships in business, technical, and professional organizations are allowable. These memberships, subscriptions, and professional activity costs should be consistent with the effort to promote the provision of quality nutrition services to Food Stamp Program eligibles. Costs of institutional memberships for nutrition personnel that work directly with the FSNE project are reimbursable. The cost to the institution should be prorated according to the percentage of time actually spent by the employee in performing nutrition education activities for the food stamp project. Professional registration or license

fees paid by individuals would not be allowable costs since the fees would be considered personal expenses, not institutional expenses.

A.12 Nutrition Education Reinforcement Materials (7CFR 277 (OMB Circular A-87))

Nutrition education reinforcement materials refers to a class of goods that are given to FSP eligibles or persons closely associated with the FSP (such as staff) containing or conveying nutrition messages and promoting good nutrition practices and increased physical activity. Such items shall have a direct relationship to program objectives and the expected behavior change. Other terms that are used to describe these items include memorabilia, souvenirs, promotional items, incentives, and educational extenders. Such items are allowable costs only if they are deemed reasonable and necessary, contain or reinforce nutrition messages, and are of nominal value ($4.00 or less per item).

FNS could not relate program reinforcement materials to any of the cost items specifically mentioned in the 2 CFR 225 (OMB Circular A-87) and 2 CFR 230 (OMB Circular A-122). Consequently, FNS shall apply the general rules for determining the allowability of costs, as described in OMB regulations, paramount among which are the reasonable and necessary cost tests.

Program reinforcement materials for nutrition education also should:

- be targeted to FSP eligibles;
- have a clear relevance and useful connection to particular FNS/FSP nutrition education messages;
- either contain an educational message or have a use that is directly relevant to reinforce nutrition education messages (example, disposable thermometer to reinforce food safety);
- have value as nutrition education aids;
- be reasonable and necessary in terms of cost and relevance;
- be offered only after weighing and assessing other relative needs and cost effectiveness;
- be of nominal value of $4.00 or less per item;
- and not be used solely for staff morale boosters.

If the reinforcement material is designed for physical activity promotion, it should be provided in conjunction with relevant nutrition and physical activity messages.

Examples of Allowable and Unallowable Program Reinforcement Materials
FNS is not able to provide exhaustive lists of specific allowable and unallowable items. However, using the criteria listed in the preceding paragraph, some illustrative examples of allowable and unallowable program reinforcement materials are provided below:

Examples of Allowable Nutrition Education Reinforcement Items:
Calendars and refrigerator magnets that contain important nutrition education messages, measuring cups, measuring spoons, or other items of nominal value which reinforce an important nutrition message. Examples of available allowable messages include Thermy™ the food thermometers' safety message ("It's safe to bite when the

temperature is right"), the "Fruits and Veggies-More Matters" campaign, MyPyramid, or USDA's Eat Smart. Play Hard.™ Campaign.

Examples of Unallowable Nutrition Education Reinforcement Items
Celebratory items, and items designed primarily as staff morale boosters; items (even of nominal value) that are not reasonable or necessary and/or have no nutrition education message; any program incentive item intended for persons who are not FSP eligible, or with a waiver, those potentially FSP eligible; any item costing more than $4.00.

A.13 Physical Activity (2 CFR 225 (OMB Circular A-87))

FNS supports efforts to improve the health and fitness of our program participants consistent with the most current Dietary Guidelines for Americans, MyPyramid and MyPyramid for Kids. These efforts include:

- Activities to help participants eat a nutritious diet by providing and linking nutrition education and program benefits.
- Activities to encourage physical activity every day by promoting active living and connecting people with community-based resources funded by appropriate entities.

The provisions of 2 CFR 225 (OMB Circular A-87) allow FNS to make reasonable judgments as to what is necessary and reasonable to deliver nutrition education. Given the Dietary Guidelines for Americans, the inclusion of physical activity promotion as a part of FSNE is an allowable expenditure. The following is guidance on what constitutes allowable FSNE costs in support of the physical activity guideline in the Dietary Guidelines for Americans. Essentially, such allowable costs are limited to activities that educate about and promote physical activity, such as providing FSP eligibles with information and encouragement to exercise, a brief exercise demonstration, and referral to local resources.

The following form the basic principles of FNS policy on physical activity:

- Educational and program materials developed to promote and reinforce physical activity for all target audiences should include messages that link nutrition and physical activity, and the associated health benefits of active lifestyles.

- All programming such as workshops, conferences, and trainings that encourages physical activity should include a focus primarily on promotion of healthy eating behaviors. Activities may include one-time physical activity demonstration for FSP eligibles and training for staff to develop skills and to help FSP eligibles.

- FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity materials that are reasonable and necessary. All physical activity materials should include a nutrition education message that promotes healthy eating and links nutrition and physical activity.

- Existing materials, especially existing FNS materials such as Loving Your Family Feeding Their Future, Nutrition Education Through the Food Stamp Program; Eat

Smart, Live Strong: Eat Smart. Play Hard.™, Team Nutrition, etc., or those available through the Food Stamp Nutrition Connection should be used and/or adapted whenever possible rather than developing new materials. Using or adapting successful interventions developed by others is preferable to developing new materials.

- FNS program cooperators are encouraged to coordinate with community, faith-based, youth and recreational organizations, and others whose primary mission is to make regular opportunities for physical activity accessible and to make a listing of these resources available to Program eligibles.

Examples of Unallowable Physical Activity Education and Promotion Costs

Incentives and reinforcement items shall be reasonable and necessary based on established cost principles (2 CFR 225 (OMB Circular A-87), 2 CFR 230 (OMB Circular A-122) and 2 CFR 220 (OMB Circular A-21)) and criteria of specific nutrition assistance programs and may not exceed $4.00 per unit. Costs incurred for health club or gym memberships, dues, equipment, (such as bicycles, treadmills, stair steps, weights, and the like); facilities (rental or modifications); ongoing classes, exercise leaders for ongoing exercise classes are not allowed. Note that the educational reinforcement items meeting the definition in Section A.12 above are permitted when they are of nominal value ($4.00 or less per item).

Examples of Allowable Physical Activity Education and Promotion Costs

FSP State agencies may make physical activity education and promotion coupled with nutrition education available to FSP eligibles in a variety of economical ways.

The development of educational materials, to teach physical activity concepts and to reinforce the health benefit of physical activity, is an allowable cost when these activities also promote nutrition education.

As customary, before developing new materials, look to resources available through FNS and other Federal and State sources, including other credible sources. If new materials are needed, justify their development. Also, when developing materials, we recommend the utmost care be taken in the assessment of the target audience and its needs in the accuracy of physical activity statements and advice is strongly recommended. A certified physical fitness professional should be consulted throughout the development phases of these materials. The cost of such consultation is allowable if it meets a reasonable and necessary test.

Purchases of educational materials promoting physical activity for FSP eligibles are allowed. Examples of educational materials include brochures, newsletters, posters, public service announcements, and audiotapes, videotapes, and DVDs. These materials may be purchased or obtained free from reliable sources such as government organizations, physical activity associations, or other authorities on the subject.

Physical activity education and promotion as part of nutrition education sessions in the FSP may include provision of advice, demonstrations (instructional in nature, and not for ongoing classes), and community resource information, (such as a free local fitness event) in

order to encourage Program eligibles to engage in regular physical activities. Physical activity **supplies** purchased for instructional demonstrations would not include large expenditure items such as treadmills or weights (see other examples noted above) since they are not reasonable or necessary and these items are well beyond the means of most recipients. *Allowable* **supply** items must be of nominal value to meet the reasonable and necessary test.

Consistent with *A.12* above, allowable physical activity **reinforcement** items that are given to FSNE recipients must meet the reasonable and necessary test and cost $4.00 or less.

Additional examples of acceptable physical activity promotion may include:

- Information on local sites where FSP eligibles 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.
- Development and provision of information and resource lists to FSP eligibles on how to promote safe and enjoyable physical activities. This information may also be available from:
    - Affiliates of voluntary health organizations (e.g., the American Heart Association).
    - State and local health departments.
    - Governor's Councils on Physical Fitness and Sports.
    - National Fitness Coalition
    - Coalition for Promotion of Physical Activity
    - State associations for health, physical education, recreation, and dance.
    - National Center for Chronic Disease Prevention and Health Promotion.
    - Materials can be ordered in bulk from:

      The President's Council on Physical Fitness and Sports
      Department W
      200 Independence Avenue SW
      Room 738-H
      Washington, D.C. 20201-0004
      http://fitness.gov
      http://presidentschallenge.org/

      The American Dietetic Association
      National Center for Nutrition and Dietetics
      120 South Riverside Plaza
      Suite 2000
      Chicago, Illinois 60606-6995
      http://eatright.org

    - Another source of information is:

      National Recreation and Park Association
      22377 Belmont Ridge Road
      Ashburn, Virginia 20148-4501
      http://nrpa.org
      Phone: 703-858-0784

A.14 Medical Nutrition Therapy (7CFR 277 (OMB Circular A-87))

This is not an allowable cost. Funds spent on medical nutrition therapy are not reimbursable by the FSP. Medical nutrition therapy is not within the scope of the FSP. If a food stamp educator becomes aware of the need for an individualized diet or meal plan, the educator should refer to a local physician or dietitian.

Allowable FSNE activities include health promotion activities and interventions aimed at primary prevention of disease. These health promotion activities should be designed to help FSP eligibles establish and maintain physically active lifestyles and healthy eating habits. Primary prevention includes activities to help FSP eligibles prevent or to postpone the onset of chronic disease by establishing more physically active lifestyles and healthier eating habits.

Secondary prevention interventions and medical nutrition therapy are not allowable FSNE expenditures. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. See also Section A.7: Medical Equipment & Clinical Health Assessments. (See Definitions in Appendix D for a fuller discussion of medical nutrition therapy and secondary prevention interventions.)

A.15 Breastfeeding (7CFR 272.2)

All FSNE activities that address the topic of breastfeeding shall be planned and implemented in collaboration with the State WIC agency and State Breastfeeding Coordinator. The WIC program should have the lead and primary role in all breastfeeding activities with FSNE supplementing existing WIC activities. A written agreement (e.g., a Memorandum of Understanding) stating the degree of collaboration and the specific responsibilities of WIC (i.e., staff, duties, and time) and the State should be included in the State FSNE Plan. This agreement shall be signed by all collaborating agencies.

A.16 Travel and Meeting or Conference Attendance (7CFR 277 (OMB Circular A-87))

Travel expenditures are a variable cost. In order to be considered for funding, the request shall provide a direct and clear link to providing quality nutrition education for food stamp recipients and those eligible.

- **Travel Destination –** Travel requests should be identified for in-state and out-of-state purposes. States should note the destination of the meeting, training or conference attendance (e.g., city, town, county, state).

- **Travel Purpose and Justification**
  - How attendance will benefit FSNE program goals and objectives
  - Justify the purpose of the travel request.
  - Describe how the travel request supports the State's FSNE goals and objectives.

- Demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff.

Number of Staff Attending

- Identify the number and type of staff making the travel request.
- Justify the number and type of staff making the travel request.
- For attendance at National level conferences, the request should be limited to no more than 4 staff persons per State.

Per Diem Rates - The standard requirements that State or Federal per diem rates shall be applied. In addition, all travel restrictions found in the OMB regulations (i.e. no first class tickets, etc) shall be followed.

A.17 Prorating Costs of Nutrition Education Activities *(7CFR 277 (OMB Circular A-87))*

When a broader audience than those described in Table I, pages 10-12, benefits from a nutrition effort that is otherwise allowable under FSNE, FNS may allow prorated costs that reflect FSNE's share of the total cost. In these situations, the calculation of FSNE's share of the total cost is based on the number likely FSP eligibles (persons at or below 130% of poverty guidelines/thresholds with the exceptions noted in Table I on page 10) that will receive the nutrition education relative to the total population to be reached. For example, if a FSNE project will reach 100 persons and 20 of these persons have gross incomes at or below 130% of poverty guidelines, then 20% of the total costs may be counted as FSNE costs. The FSP may then reimburse the State for 50% of the FSNE costs. In other words, FSP Federal funds would reimburse half of 20% of the total costs of this project or 10% of the total project.

States shall show how prorated costs were calculated, fully describe the nature of such costs and demonstrate the value of the proposed activity to FSNE. Since activities that target general audiences are often not designed with the needs of FSP eligibles in mind, the State shall justify how the activity is a good vehicle for reaching FSP eligibles and changing their nutrition-related behaviors.

A.18 College/University Students *(7CFR 277 (OMB Circular A-87))*

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 FSP and therefore not eligible to receive FSNE. However, students may be able to get food stamp benefits (and participate in FSNE) if otherwise income eligible and they:

- Get public assistance benefits under a Title IV-A program;
- Take part in a State or federally financed work study program;
- Work at least 20 hours a week;
- Are taking care of a dependent household member under the age of 6;
- Are taking care of a dependent household member over the age of 5 but under 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,
    - A program under Section 236 of the Trade Act of 1974,
    - An employment and training program under the Food Stamp Act, or
    - An employment and training program operated by a 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.

An exclusivity waiver is required for FSNE activities that do not exclusively serve students that meet the criteria outlined above.

A.19 School Wellness Programs

Programs of local school wellness are intended to empower local communities to band together to promote and reinforce healthy eating and lifestyle behaviors. FSNE helps contribute to community health and wellness goals by providing nutrition education within eligible schools and eligible venues. These nutrition education activities help generally low income students and their families make wise and economical food purchase selections in accordance with dietary guidelines and MyPyramid. FSNE is intended for that segment of the community who are eligible for the Food Stamp Program (FSP). While FSNE may pay for education directed to FSP and eligibles, it is not within its scope to pay for local initiatives that are directed to the entire community. Such initiatives are the financial responsibility of the community.

A.20 Staff Wages and Benefits (7CFR 277 (OMB Circular A-87))

All staff wages and benefits shall be computed on a reasonable hourly basis commensurate with duties being performed, or the Federal minimum hourly wages established by the United States Department of Labor. The wages are not necessarily commensurate with wages that would be paid to the individual when performing duties for which he/she is credentialed, but shall relate to the task they are performing for FSNE. (Reference FSNE Guidance page 49 for a discussion of reasonable and necessary cost).

- Staff shall record time as specified in the FSNE Guidance (Appendix C, Section A.10, Time Records).
- The time shall not be used as a reimbursement item for any other Federal grant.

A.21 Approved Radio Station Outlets

The USDA FSP outreach campaign has identified and selected targeted markets and radio stations in an effort to increase participation in the FSP. Stations were selected with a high percentage of low-income listeners in areas with low food stamp participation rates and high poverty rates. FSNE State agencies that wish to use these radio stations in their mass media campaigns may do so as a proxy measure of allowability without a need for waiver. FSNE States need only to certify that the radio stations used in the outreach campaign within the past two years will be used for FSNE radio spots. A listing of these radio stations can be found at www.fns.usda.gov/fsp/outreach/radio-buys.htm

B. Sources of State Share Program Cost

B.1 Private, Third-Party, In-kind Donations (Non-cash Outlays) (7 CFR 277.4(e))

The FSNE State plan is approved for a specified level of funding. The Federal government reimburses the State for 50 percent of allowable costs incurred by the State. The Federal government is authorized to reimburse a State agency only for actual expenditures incurred. Because the value of private, third party, in-kind donations, including volunteer services, do not represent any State expenditure or outlay, they are not considered as a cost to the program, and thus are not reimbursable.

As specified under 7CFR 277.4(e), the value of services rendered or the value of goods (i.e., in-kind) donated by private, third parties, including volunteer services, are not allowable for reimbursement purposes under the FSP. However, State agencies are not prohibited from accepting private, third party cash donations.

B.2 Private, Third-Party, Cash Donations

Private, third party cash donations are not generally allowable for reimbursement purposes. However, the State agency may request a waiver (7CFR 272.3). (See A.3 for Waivers)

B.3 Other Federal Funds (7CFR 277 (OMB Circular A-87))

The State agency's share of program costs may not include funds paid by the Federal government under another assistance agreement unless authorized under that agreement and its laws or any non-Federal funds contributed for another Federally assisted program unless authorized by Federal legislation. Consequently, Federal funds provided by USDA's Cooperative State Research Education and Extension Service (CSREES) to the 1862 and 1890 Land Grant Universities or to the State's Cooperative Extension Service (and any State or non-Federal match for those Federal funds) may not be used as part of the State agency's share of FSP costs. However, certain Federal legislation supporting funding to Indian Tribal Organizations (ITO) contains "other Federal laws notwithstanding" language which allows tribal governing bodies to use Federal funds as matching to receive other Federal funds. An ITO that chooses to submit a nutrition education plan for inclusion in the State plan can use Federal funds as a local source of revenue to request reimbursement for food stamp administrative funds.

In such circumstances, the State agency shall provide assurance that the source of local matching funds is a Federal grant containing the "notwithstanding" language, and shall clearly specify the intention to use Federal funds, the amount of the funds, the Federal agency source, and the citation that authorizes those Federal funds to be used as a match for other Federal funds. In addition, a copy of the grant agreement between the ITO and the Federal agency shall be available for review.

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights (7 CFR 272.5(a) (4))

The Food and Nutrition Service reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, photocopies, illustrations, computer programs such as CD-ROM and related source codes, literature, or other products produced with FSP funds for government purposes. The State and local agencies may sell videos, photocopies, illustrations or literature to other States for FSNE purposes at the cost of reproduction, plus shipping and handling. If a State agency (or local agency) realizes Program Income from the sale of nutrition education materials, [videos, literature, etc. paid with Federal dollars], it shall report the amount to FNS as program income on the SF-269 form. Any program income earned through the sale of print and audiovisual materials produced under the grant shall be used to reduce the cost of the grant to FNS. Prior to calculation of the reimbursement levels for State and Federal shares, total costs shall be reduced by the amount of Program Income earned less the expenses incurred. The gross amount of Program Income may be reduced by the cost of producing that income. For example, re-production costs may be deducted from the gross amount of Program Income.

C.2 Disclosure and Sharing of Case File Information (7CFR 272.2)

Under the provisions of both the Food Stamp Act of 1977, as amended, (the Act) and Food Stamp regulations, case file information on FSP recipients is considered confidential and may not be released unless certain conditions are met. Section 11(e)(8) of the Act provides a limited exception to the confidentially provision. Disclosure of information obtained from applicant households may be made only to persons directly connected with the administration of FSP.

Previous guidance noted that the Expanded Food and Nutrition Education Program, administered by the USDA Cooperative Extension Service, met the exception provision of the Act and could therefore request certain recipient information from the State agency. This was not intended to limit the exemption provision to this Program or agency. Any organization that has a legal agreement with the State agency, may, upon request to the State FSP agency, be permitted access to recipient information. Since the type of information requested may require State designed ad hoc reports, it is best to not request local offices to provide information. Request examples may include non-financial information such as name of head of households with children, address, telephone numbers, or address labels for all elderly by zip codes. The information may be released solely for administration of the FSP. In this case, this means for assistance in targeting and delivering nutrition education to food stamp applicants and participating households. The receiving organization shall assure that the information is shared only with relevant persons for the purpose of the targeting and delivering nutrition education, and shall protect it from disclosure to other parties. Each State agency will determine the scope and type of information, based on its judgment, that may be released for purposes of providing nutrition education to applicable households.

C.3 Scholarships and Tuition (2CFR 220 (OMB Circular A-21))

2 CFR 220 (OMB Circular A-21) makes a distinction between scholarships, fellowships and other similar financial transactions, and tuition remission and similar work/study payments. For scholarships, costs may only be charged if (1) the purpose of the scholarship is for

training of selected students, and (2) approval is granted by the grantor agency. There would need to be a necessary and reasonable judgment for approval of any scholarship payment shown as a cost to FSNE. In general, this is not a cost that would be necessary and reasonable for the purposes of this grant. In the event the scholarship is based on research activity, FNS would normally not accept the cost as being necessary and reasonable. The primary function of FSNE is teaching nutrition education to food stamp eligibles. While basic research may be a commendable activity for developing new methods or data, it is beyond the basic purpose of this grant.

Tuition remission on the other hand may be allowable in whole or in part, depending on the situation. The criteria for approval are:

1. There is a bona fide employer-employee relationship between the student and the institution for the work performed.
2. The tuition or other payments are reasonable compensation for work performed and are conditioned explicitly upon the performance of necessary work. Again any research activity should be carefully reviewed and in most cases not approved due to the fundamental differences in our grants and other grants provided for nutrition education.
3. It is the institution's practice to similarly compensate students in non-Federally funded activities as well as Federally funded grants.

Students who are working on FSNE under a tuition remission situation shall account for their time, as would any full time or part time staff. The financial review of this charge shall take into account both the type of work performed and the number of hours worked. As with any charge, tuition remission can only be charged by the percentage of time that the student or employee worked on FSNE. If the student is working 50% of their time on FSNE, only 50% of the tuition may be charged to FNS. Again, a necessary and reasonable judgment should be made as to purpose of the work and its impact on FSNE.

C.4 Examples of Allowable and Unallowable Costs

The following table provides some examples of allowable and unallowable costs.

ALLOWABLE	UNALLOWABLE
Literature/Materials/Audiovisuals	
• The purchase of FNS nutrition education/promotion materials that address FSNE topics and are for use with FSP eligibles. • The purchase of other nutrition education materials, when there are no FNS materials available that address FSNE topics and will be used with persons eligible for the FSP. • The production of nutrition education materials, for which there is no other existing comparable material that support the State's goals and objectives for FSNE and will be distributed to FSP eligibles. It is encouraged that States collaborate with other FNS programs on the messages conveyed in and the costs of education materials. The State agency shall (7CFR 277 (OMB Circular A-87)) describe the method used for allocating costs between the programs.	• Costs for any nutrition education materials that have already been charged to another Federal or private program or source. • Any material that endorses or promotes brand name products or retail stores. • Manufacturer's or store (cents off) coupons. • Influencing a store's pricing policy. • Any activity or material to lobby or influence Federal, State or local officials to pass or sign legislation or to influence the outcomes of an election, referendum or initiative. • Negative written, visual, or written expressions about specific foods, beverages, or commodities.
Social Marketing Campaigns	
• Local radio and television announcements of nutrition education events for food stamp eligibles. • Appropriate social marketing campaigns that target nutrition messages to food stamp eligibles 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% of poverty guidelines or thresholds.	• Social marketing campaigns that target the general population. In some instances, prorated costs based upon the number of likely FSP eligibles (≤ 130% of poverty guidelines/thresholds, with certain exceptions) that will be reached with the campaign may be allowed. • Nutrition education messages which convey negative messages or disparage specific foods, beverages or commodity, or which are not consistent with the Dietary Guidelines for Americans and MyPyramid. • Television and radio announcements/advertisements that do not include a brief message about the FSP, its benefits and how to apply.

ALLOWABLE	UNALLOWABLE
Equipment	
• Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. (This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment. • Equipment shared with non-FSP users when cost-shared with those users • Kitchen appliances only with justification of reasonable and necessary need.	• Equipment that exceeds prior approval thresholds (i.e. $5,000) unless such prior approval is received from FNS. • Medical equipment
Food Samples, Supplies and Provisions	
• Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation and display of food prepared for demonstration purposes. • Food samples associated with nutrition education lessons.	• Ongoing snack or food service • Meal sized portions or complete meal service • Cost of food provided as groceries or supplemental food
Nutrition Education	
• Classroom setting (salaries, space, equipment, materials) for food stamp eligibles on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class shall (7 CFR 272.2) be to provide nutrition education. If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. Schools shall (7CFR 277 (OMB Circular A-87)) be public government entities for in-kind charges. • Physical activity demonstration, promotion, referral that includes a nutrition message.	• Classes that are designed to provide case management or "life skills" training (e.g., classes on English as a second language, parenting, child development, crisis management, rental information). • Medical nutrition therapy and secondary prevention interventions (Refer to Appendix D, Definitions). • Weight loss classes, individualized meal plans, obesity treatment programs, etc. • Ongoing physical activity and exercise classes, equipment or facilities. (Refer to Appendix C: Physical Activity Cost Policy Section).

ALLOWABLE	UNALLOWABLE
Nutrition Education	
• The pro rata share of costs of classes that are provided in conjunction with another program (e.g., WIC), provided the State agency describes the method for allocating costs between the programs. • Breastfeeding education, promotion and support which is coordinated with WIC and which supplements and complements WIC services, rather than supplanting them. • 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 for free on the FNS Web site at: http://www.fns.usda.gov/fsp//outreach/info.htm	• Clinical health screening (i.e., cholesterol testing, body mass index and blood glucose testing, etc). • Distribution of nutrition education reinforcement items over $4.00. • Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.) • Breastfeeding education, promotion and support that duplicates or otherwise is provided for under other funding sources such as WIC, EFNEP, or Head Start. • Education provided to incarcerated or institutionalized persons that are not eligible for the FSP (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 FSP and therefore not eligible for FSNE. For information on students that may be eligible: http://www.fns.usda.gov/fsp/applicant_recipients/students.htm • Activities where the primary objective(s) is to conduct outreach efforts for the FSP or other programs.
Space Allocation	
• Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked. • Space donated by local school districts, but only the cost of the space based on depreciation or use allowance.	• In-kind charges for space that is donated by a private third party or costs that are fully funded by another program or agency (e.g., USDA, WIC, and EFNEP programs), or the FSP, (i.e., FSP county waiting room). • Commercial rental spaces cannot be used for publicly owned space.

ALLOWABLE	UNALLOWABLE
Staff and Training Costs	
• FSNE-related training for program delivery staff. The time volunteers of a public agency spend performing FSNE-specific duties. Time shall (7CFR 277 (OMB Circular A-87)) be charged at a rate commensurate with the duties being performed. • Staff time spent delivering nutrition education to food stamp eligibles. Time shall (7CFR 277 (OMB Circular A-87)) be charged at a rate commensurate with the duties being performed. • General briefings to community health care providers serving low-income communities about FSNE services in the community.	• The time volunteers of a non-public agency (e.g., faith-based organizations, many food banks, etc.) spend performing FSNE specific duties. • 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. • University courses that are not relevant to the practical delivery of nutrition education to food stamp eligibles. • Training or development costs of food service workers or others not directly associated with delivery of FSNE.
Costs Associated with Other Activities	
• Reimbursement for personal costs (such as childcare, meals, lodging, and transportation) for recipients of FSNE to actively participate in focus groups, needs assessment and advisory groups to inform and improve FSNE effectiveness. • Nutrition education activities that promote the selection of healthy foods from vending machines. • Participation on relevant State and local advisory panels.	• Organized efforts to influence elected officials and lobbying for legislative/policy changes. • Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely FSP eligible respondents (persons with incomes less than or equal to 130% of poverty guidelines/thresholds, with certain exceptions). • Costs associated with the establishment and maintenance of environmental or policy changes, such as staffing, infrastructure, equipment, space, land, construction or supplies. • Money, vouchers or passes provided to FSNE recipients to offset personal costs incurred so that they may attend nutrition education classes (e.g., for childcare and transportation expenses). • Childcare or transportation services provided for FSNE recipients in conjunction with FSNE activities. • Reinforcement items over $4.00. (Refer to Appendix C Cost Policy Section-Program Reinforcement Items)

Appendix D:
Definitions

These definitions are for clarification of terms that may be used throughout the guidance.

Activity refers to actual work performed by program personnel to implement objectives.

Administrative Costs refers to the financial costs characterized by the following types of activities:

- Dollar value of salaries and benefits associated with staff time dedicated towards the *administration* of the FSNE program.
- Cost of training for performing administrative functions like record keeping and accounting, etc.
- Cost of reporting FSNE activities
- Operating Costs
- Indirect Costs for those administrative staff not covered above.
- Other overhead charges associated with administrative expenses (i.e. Space, Human Resource services, etc).

Applicant refers to person/households who have actually applied for the FSP.

Behavior indicates action rather than knowledge or attitudes.

Behaviorally Focused Nutrition Messages are those that are (a) related to healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example encouraging breast feeding practices, or physical activity (c) related to the environmental impact of dietary practices, including safe food handling, promoting community walking groups (d) related to food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk, and (e) food security such as applying for nutrition assistance programs (i.e. WIC, FSP, Child Nutrition Programs, Food Distribution Programs, etc).

Budget Projection, FNS-366A is a budget report submitted by State agencies to FNS to request the amount of annual funds needed to operate the FSP. It is the form used to support the annual funding request. Any need for additional funds require a revised 366A.

Capital Equipment is non-expendable property having a value of $5000 or more per item at the time of acquisition. Capital equipment shall (7CFR 277 (OMB Circular A-87)) be inventoried and accounted for every two years by a physical inventory process. Capital equipment shall be disposed of in accordance with Federal property management requirements.

Census Tracts are small, relatively permanent geographic entities within counties (or the statistical equivalent of counties) delineated by a committee of local data users. Generally, census tracts have between 2,500 and 8,000 residents and boundaries that follow visible features. When first established, census tracts are to be as homogenous as possible with respect to population characteristics, economic status and living conditions.

Cognizant Federal Agency refers to the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item A.2 Indirect Cost Rate in Appendix C.

Organization	Cognizant Federal Agency
State Public Assistance Agencies	Dept. of Health and Human Services (DHHS)
All Other State agencies	Federal agency identified by OMB
Educational Institution	Department of Education, Department of Defense-Naval Research or DHHS, depending on which provided more Federal funds over the last 3 years
Nonprofit Organization	Normally the Federal agency with the largest dollar value of award with the organization

EARS, the Education and Administrative Reporting System (EARS), is an annual data and information collection process completed by Food Stamp Program (FSP) State Agencies. It collects uniform data and information on nutrition education activities funded by the FSP during the prior fiscal year.

Effectiveness is the extent to which pre-established objectives are attained as a result of program activity, as indicated by performance measures.

Fiscal Year is the Federal Fiscal Year that runs from October 1st of one year through September 30th of the following year.

Food Bank means a public or charitable institution that maintains an established operation involving the provision of food or edible commodities, or the products of food or edible commodities, to food pantries, soup kitchens, hunger relief centers, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to feed needy persons on a regular basis.

Food Pantry means a public or private nonprofit organization that distributes food to low-income and unemployed households, including food from sources other than the Department of Agriculture, to relieve situations of emergency and distress.

Food Stamp Program Eligibles are persons that meet criteria for participation in the Food Stamp Program as described in Federal legislation and regulations. Persons that participate in the formal Food Stamp Program certification process and are determined eligible (e.g., Food Stamp Program participants) clearly meet these criteria. Some persons that are eligible for the Food Stamp Program do not apply. These non-participating eligibles are not as easy to identify because they typically have not participated in a formal certification process. Food Stamp Program Eligibles are the recognized target audience for Food Stamp Nutrition Education.

Full-Time Equivalent (FTE) employment, as defined by the Federal government, means the total number of straight-time hours (i.e., not including overtime pay or holiday hours) worked by employees divided by the number of compensable hours (2,080 hours) in the Fiscal year. According to this definition, annual leave, sick leave, compensatory time off and other approved

leave categories are considered "hours worked" for purposes of defining FTE employment. States may define FTEs differently than the Federal standard. States may use their own definition of FTEs in their FSNE Plan, but shall (7CFR 277 (OMB Circular A-87)) clearly state the definition and the basis for the calculation.

Grantee means the agency of the State responsible for administering the Food Stamp Program. Federal funds are paid to this agency for all food costs, and for 50 percent of all non-food expenditures, including program administration and nutrition education. The grantee in turn takes agreements with local agencies (sub grantees) to conduct nutrition education activities. Federal funds are made available to pay for half of all allowable nutrition education costs on a reimbursement basis.

Indirect cost rate is a rate typically computed by summing all indirect costs then divided the total by the Modified Total Direct Costs. The resulting percentage is applied to each grant to determine their share of the indirect or overhead costs. Indirect cost rates applied in the FSNE plan shall (7CFR 277 (OMB Circular A-87)) be documented through an indirect cost plan that is approved by a cognizant agency. If the rate is not approved, the computation of the rate shall be acceptable to FNS.

Lobbying is any activity or material to influence Federal, State, or local officials to pass, or sign legislation or to influence the outcomes of an election, referendum, or initiative.

Low-income Persons are people participating in or applying for the Food Stamp Program, as well as people with low financial resources defined as gross household incomes at or below 185 percent of poverty. National School Lunch Program data on number of children eligible for free and reduced price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where low income persons reside, are available data sources that can be used to identify low income populations. Participation in WIC may also be used as a proxy for low income since WIC participants have gross family incomes below 185 percent of poverty.

Marketing Orders generally refer to USDA or State programs that support prices and consumption of various fruits, vegetables, milk, eggs and meat programs. Funds are collected from the producers and used to publicize the item in question. Limits to production are also enforced. (For example both Florida and California have orange marketing order boards). With some constraints, money and services provided by marketing boards can compromise an allowable component of a State Plan. However, the promotion of a specific item (for example, only oranges) is not an allowable expense.

Medical Nutrition Therapy Services means the assessment of the nutritional status of patients with a condition, illness, or injury (such as diabetes, hypertension, gout, etc.) that puts them at risk. This includes review and analysis of medical and diet history, laboratory values, and anthropometric measurements. Based on the assessment, nutrition modalities most appropriate to manage the condition or treat the illness or injury are chosen and include the following:

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.
- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; parenteral nutrition delivered

via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients. Medical Nutrition Therapy Services are not allowable FSNE costs.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs of individuals and/or target populations in the community.

Non-Capital Equipment is property having a value of less than $5000 per item at the time of acquisition. This equipment is generally treated as supplies and is not required to be included in any property management system. Treatment and disposition of non-expendable equipment should be done in accordance with State or local property management requirements.

Non-Federal Public Agency is a State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such as organizations that are chartered by State or local governments for public purpose.

Nutrition Education is a set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition-related behaviors conducive to health and well being for those on a limited budget.

Nutrition Education Plan is an official written document that describes FSNE services to be provided. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

Outreach is providing information or assistance to individuals who might be eligible for the Food Stamp Program http://www.fns.usda.gov/fsp/ in order to help them make an informed decision whether to apply for the Program. State FSP agencies seeking Federal funding for Outreach activities may annually submit an Outreach plan to FNS for approval.

Plan Confirmation means a time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of Plan Confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of Plan Confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS (Normally this will not be an issue since audits normally occur at least every two years). For further information refer to 2 CFR 220 (OMB Circular A-21). If approval through the audit process has not occurred, the Division of Cost Allocation, DHHS, should be contacted as follows:

The U.S. Department of Health and Human Services
Office of the Secretary
Division of Cost Allocation
200 Independence Ave, S.W.
Washington, D.C. 20201
Telephone: 202-401-2808
Toll Free: 1-877-696-6775

Poverty Guidelines are an administrative version of the Federal poverty measure and are issued annually by the Department of Health and Human Services in the Federal Register. Sometimes

referred to as the Federal Poverty Level, these guidelines are often used to set eligibility for certain programs. http://aspe.hhs.gov/poverty/index.shtml.

Poverty Thresholds are the statistical version of the Federal poverty measure and are released annually by the Census Bureau. They are used to estimate the number of persons in poverty in the United States or in states and regions. www.census.gov/hhes/www/poverty.html

Project means a discrete unit of nutrition education intervention at the local level, which is distinguished by a specifically identified low-income target population. The term "Project" is intended to apply to a geographic area primarily for the purpose of developing and supporting a request for an exclusivity waiver.

Public Education Outreach Message is a brief message providing information on the availability, benefits, and application procedures for the Food Stamp Program, preferably with information on local application sites, (or a toll-free number, or other useful information on how to find services). When FSNE is provided to low-income persons not participating in the Food Stamp Program, by virtue of approved waivers, a critical component of the nutrition message should be to provide an educational message about the availability and benefits of the program and how to apply. This should be done "in the context" of nutrition education, meaning the Food Stamp Program should routinely be referenced in nutrition education sessions and on materials as an important source of nutrition assistance to help low income persons achieve a better diet.

Public Housing, as defined by the U.S. Department of Housing and Urban Development, is apartments for low-income people, operated by local housing agencies.

Random Moment Time Studies are time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities and funding sources.

Secondary Prevention Interventions mean activities that help people who already have a chronic disease cope with and control these conditions in order to prevent additional disability. Secondary prevention interventions are not allowable costs in the Food Stamp Program.

Social Marketing is defined as a disciplined, consumer-focused, research-based process to plan, develop, implement and evaluate interventions, programs and multiple channels of communications designed to influence the voluntary behavior or a large number of people in the target audience. (Adapted from Alan Andreasen 1995 and Social Marketing Division of Society for Nutrition Education.)

Soup Kitchen means a public or charitable institution that, as an integral part of the normal activities of the institution, maintains an established feeding operation to provide food to needy homeless persons on a regular basis.

State Agency means the agency of State government, including the local offices thereof, which is responsible for the administration of the Federally aided public assistance programs within the State, and in those States where such assistance programs are operated on a decentralized basis; it includes the counterpart local agencies, which administer such assistance programs for the State agency.

State Nutrition Action Plans (SNAP) are statewide cross-program nutrition education plans for the USDA nutrition assistance programs. These plans focus on a single goal and promote collaboration and use of integrated nutrition education approaches across FNS Programs to connect the efforts and resources of all the USDA programs to achieve that goal. Since February 2003, State teams consisting of key staff representing USDA nutrition assistance programs have worked together to develop and implement their action plans. SNAP plans, achievements and contact information are available on the FNS Web site at www.fns.usda.gov/oane/SNAP/SNAP.htm

Sub grantee means the organization or person to which a State agency, as grantee, takes an agreement to conduct nutrition education activities. Federal funds reimburse the grantee for half of its allowable administrative costs, including nutrition education. The grantee in turn generally will reimburse sub grantees for half of their allowable costs. The sub grantee is accountable to the grantee for the use of funds provided, and the grantee is accountable to the Food and Nutrition Service for the use of all Federal funds provided.

Target Audience refers to Food Stamp Program Participants and Eligibles.

Unduplicated Count refers to the number of different individuals who receive any FSNE direct education. Each individual counts as one participant, regardless of the number of times he or she has participated in direct education activities.

Appendix E:

List of Abbreviations

ADP- Automated Data Processing

BPS- Budget Project Statement

CFR- Code of Federal Regulations

DOJ- Department of Justice

EARS-Education and Administrative Reporting System

EFNEP- Expanded Food and Nutrition Program

ESLS- Eat Smart, Live Strong

FDPIR-Food Distribution Program on Indian Reservations

FSNC- Food Stamp Nutrition Connection

FSNE- Food Stamp Nutrition Education

FNS- Food and Nutrition Service

FSP- Food Stamp Program

FY- Federal Fiscal Year

ITO- Indian Tribal Organization

LYFFTF- Loving Your Family Feeding Their Future

MOU- Memorandum of Understanding

NAL- National Agricultural Library

OGC- U.S. Department of Agriculture Office of General Council

OMB- Office of Management and Budget

PDF- Portable Document Format

PSA- Public Service Announcement

SNAP- State Nutrition Action Plan

SSI- Supplemental Security Income

TA- Technical Assistance

TANF- Temporary Assistance for Needy Families

WIC- Special Supplemental Food Program for Women, Infants and Children

USDA- United States Department of Agriculture

Appendix F:
Food Stamp Nutrition Connection Web Site

The Food and Nutrition Service (FNS) and the National Agriculture Library's Food and Nutrition Information Center (FNIC) sponsor an online resource, called the **Food Stamp Nutrition Connection**. This web site is designed to improve access to Food Stamp Program nutrition resources. Educators nationwide can use this site to identify curricula, lesson plans, research, training, tools and participant materials. The Food Stamp Nutrition Connection is available at foodstamp.nal.usda.gov

At the web site, you will find nutrition tools and information specifically addressing the needs of the low-income audiences. This resource is not restricted to materials developed with funding from the Food Stamp Program. Further, materials on the site are reviewed for basic quality, but their inclusion on the site does not constitute endorsement by USDA. Major sections of the site include a Training Center, Resource Library, Hot Topics A-Z and National FSNE.

We encourage you to subscribe to FSNC-Talk, an electronic mailing list for national, regional and State, and local Food Stamp Program nutrition education contacts. Information about how to join the list is available on the Food Stamp Nutrition Connection web site.

Also, you're invited to share your materials with FNIC so that others may benefit from your experience and expertise. A hard copy and an electronic copy of each document are preferred. Please submit nutrition education or training materials such as videos, curricula, games, handouts, booklets, displays, web-based modules, and lesson plans to the Food Stamp Nutrition Connection Resource System for use on the Web site or in the database. For details on how to submit materials, visit the Sharing Center on the Food Stamp Nutrition Connection Web site at this address: http://www.nal.usda.gov/fsn/sharing_center_submission.shtml. You may also send an email to: FSNC@nal.usda.gov or call (301) 504-5414. If you would like to donate a copy of a new resource for review, please address it to:

Food Stamp Nutrition Connection
Food and Nutrition Information Center
USDA/ARS National Agricultural Library
10301 Baltimore Avenue, Suite 105
Beltsville, MD 20705-2351

Or you may use the following form as a handy way to submit items.

Continuing updates and new developments are planned for the Food Stamp Nutrition Connection website so check back often for new additions. If you have any questions about the resource sharing system or information provided on the web site, contact staff by telephone at (301) 504-5414, by fax at (301) 504-6409, or by e-mail at FSNC@nal.usda.gov

Food Stamp Nutrition Connection
Resource Sharing Form

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is PRA#0518-0031, expiration 03/31/2008. The time required to complete this information will vary based upon one's relationship to the resource being submitted. It is estimated to take 19 minutes to complete the entire survey. This includes time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. If you need help with this form, please contact us. E-mail: FSNC@nal.usda.gov. Telephone: (301) 504-5414. TYY: (301) 504-6856.

Part 1. About You

Please provide your contact information in case we have questions about this resource. View our Privacy Policy at http://www.usda.gov/news/privacy.htm

1. Your name:
2. Your e-mail address:
3. Which best describes your relationship to the resource you are submitting?
   - ❍ I developed this material (complete sections I-III)
   - ❍ I distribute or handle ordering for this material (complete sections I, II and IV)
   - ❍ I use this resource but I am not the developer or distributor of this material (complete sections I and II)

Part II. Resource Information

Please tell us about the material you are submitting.

1. Resource Title:_____
2. Developer/ Author(s):
   _____
3. Primary Author's Affiliation: _____
4. Publication/Revision Date:_____ Edition:_____
5. How is this material used?
   - ❍ Consumer Education
   - ❍ Staff Training
   - ❍ Background Information/Research

6. What languages are available?

7. If this resource is available online, please provide the web site address (URL).
_____

8. Briefly, describe your resource.

9. How do we contact the publisher/distributor?

Publisher
Name_____

Street Address_____

City_____ State_____ Zip Code_____

Telephone_____ E-mail_____

Part III. Author/ Developer Information
Please share information about how this material was developed.

1. Please describe the target audience.

2. If you used a readability formula to test this material, please provide the following:
name of the formula used_____ score/grade level _____

3. Please describe any pilot studies conducted.

4. Does this material include a validated evaluation tool? ___Yes ___No

5. What is the funding source for the development of this material?

Comments:

Part IV. Publisher/Distributor Information

1. ISBN number (if applicable):_____
2. Please indicate how this material may be used by other educators.
   ___May copy for educational purposes without prior permission.
   ___Permission needed to copy.
   ___May not copy.

3. How can educators order this material?

4. What is the cost of this material? (price/unit)_____
5. Can this material be ordered in quantity? ___Yes ___No
6. Describe any bulk discounts available.

Comments:

Thank you for sharing your resource!

If you are completing a printed copy of this form, please return it to:
Food and Nutrition Information Center/FSNC
National Agricultural Library
10301 Baltimore Avenue
Beltsville, Maryland 20705-2351
Fax: (301) 504-6409

Appendix G:

Timeline

April 1-August 15	**States may Submit Plans for the coming FY to the FNS Regional Office**
May 01	**Last date for submission of Plan Amendments for current year with New/Significantly Revised Activities to FNS Regional Office**
August 15	**Plans for coming year are due to FNS Regional Office**
October 1	**States May Receive Response/Approval for Plan from Region** if plans are submitted in an appropriate format and all necessary data is provided. Plans that are not in the format of the Guidance and/or do not supply data requested in the Guidance may require additional review and hence a longer approval time. Extraneous information and unnecessary documentation may also hinder plan review or result in a denial. FNS will approve a plan in full or in part or not at all. If only portions of the plan are approvable FNS will approve those portions.
November 30	**Final Report for Previous FY Due to FNS Regional Office**
December 31	**Submission of EARS data through the online system**

Appendix H:
Food Stamp Nutrition Education Guiding Principles

Introduction:

The United States Department of Agriculture's (USDA) Food Stamp Program (FSP) provides nutrition assistance benefits to eligible low-income households that can be used to purchase foods from authorized food retailers, thereby providing a food security safety net. When Congress created the FSP in the early 1960's, it envisioned a program that provided households with access to a healthy, nutritious diet. Today, as this FSP has grown into the largest Food and Nutrition Service (FNS) nutrition assistance program, that goal remains central to its mission and purpose.

FNS encourages and supports nutrition education designed to help food stamp participants and eligibles choose healthy foods and active lifestyles. Under current regulations, State FSP agencies have the option to provide, as part of their administrative operations, nutrition education for persons who are eligible for the Program. States must (7CFR 272.2) submit an annual plan to FNS for approval; FNS then reimburses States for 50 percent of the allowable expenditures for nutrition education, comparable to the rate FNS provides for other administrative functions.

State FSP agencies contract with Cooperative State Research, Education and Extension Service (CSREES), State Departments of Health or Education, and State-level nutrition networks or others to provide nutrition education services to the target audience. In 1992, seven State agencies had approved food stamp nutrition education (FSNE) plans; this has grown to include fifty-two State agencies in 2004. Federal funds approved for FSNE grew from $661,000 in 1992 to over $228 million in 2004.

The growing interest in providing nutrition education as part of the FSP is supported by clear evidence of need. A USDA study from 2000 indicates many low-income adults do not know specific facts related to what types of dietary practices are healthful, such as what specific foods they should eat to maintain a healthy diet.[1] More recently, attention has focused on providing nutrition education and services to address the rising epidemic of overweight and obesity in America. Here, too, the need is great -- for example, approximately 65% of adults in America and 16% of children and adolescents are overweight[2]—putting them at risk for serious health problems including heart disease, hypertension, diabetes and some cancers.

Low-income households have a higher prevalence of health conditions related to poor nutrition than households with higher incomes. Women with lower family income levels are 50% more likely to be obese than those with higher family incomes. Children of overweight mothers are more likely to be overweight themselves by age 6 than children of lean mothers.[3] And, while obesity rates have doubled in children and tripled in adolescents over the last two decades, they have increased the most among those in the lowest income levels, especially African American and Mexican American children.[4] [5] [6]

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[1] Gleason P, Rangarajan A, Olson C. Dietary Intake and Dietary Attitudes Among Food Stamp Participants and Other Low-Income Individuals. USDA, September 2000.
[2] Health, United States, 2003, Chartbook on Trends in the Health of Americans, National Center for Health Statistics, CDC.
[3] Berkowitz RI, Stallings VA, Maislin G, Stunkard AJ. Growth of children at high risk for obesity during the first 6 y of life: implication for prevention. Am J Clin Nutr. 2005; 81:140-6.
[4] The Surgeon General's Call To Action To Prevent and decrease Overweight and Obesity 2001, U. S. Department of Health and Human Services, Public Health Service, Rockville, MD.
[5] Ogden CL, Flegal KM, Carroll MD, Johnson CL. Prevalence and trends in overweight among US children and adolescents, 1999-2000. JAMA 288: 1728-32. 2002.
[6] Health, United States, 2002, National Center for Health Statistics, CDC

The Guiding Principles in this document articulate FNS' vision for FSNE and address the nutrition concerns and food budget constraints faced by FSP eligibles. While these Guiding Principles establish standards of excellence for FSNE, the State Nutrition Education Plan Guidance provides the detailed policy that governs FSNE operations. Together, these documents are key resources for States that provide FSNE.

These Guiding Principles recognize that achieving and sustaining positive change in eating and nutrition-related behaviors is a complex challenge involving a dynamic interplay between factors that include individual characteristics; physical, social, cultural contexts and the larger social processes.[7] Consistent nutrition education messages need to be communicated through multiple channels that reach people where they live, work, learn and play in order to have an effect on this multiplicity of factors.

Guiding Principles:

1. **Food Stamp Nutrition Education is intended for food stamp participants and individuals eligible for the Food Stamp Program.**

This FSNE principle supports the overall goal of the FSP which is to provide eligible low-income households with nutrition benefits to ensure that they have access to an adequate diet. FNS defines FSP eligibles as persons that meet criteria for participation in the FSP as described in Federal legislation and regulations. Persons that participate in the formal FSP certification process (e.g., FSP participants) are the only persons known with certainty to meet criteria for participation in the program. As such, FSP participants, who currently number over 25 million of the nation's neediest people, are at the core of FSNE efforts. Because persons eligible for the FSP may participate in the Food Distribution Program on Indian Reservations (FDPIR) in lieu of the FSP, FDPIR participants are considered as participating in the FSP and may receive FSNE.

Many persons are eligible for food stamp benefits but do not participate. FNS is committed to providing FSP eligibles with the opportunity to receive nutrition education. The Agency has determined that a household income of $\leq$130% of the Federal Poverty Guidelines (FPG) is generally a reasonable eligibility proxy for the purpose of receiving FSNE. For example, participation in the Temporary Assistance for Needy Families (TANF) program is a reasonable proxy for food stamp eligibility as it concerns FSNE. Persons typically ineligible for the FSP (i.e., incarcerated persons, boarders, etc.) are exceptions to this proxy criterion.

Furthermore, certain settings offer a high likelihood of reaching Program eligibles and are appropriate locations for FSNE delivery. When FSNE is delivered through the following venues, waivers to the FSP exclusivity rule are not required.

- Food Stamp/TANF offices
- Public Housing Sites
- Food Banks
- Job readiness or training programs for FSP/TANF recipients

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[7] Promoting Health, Intervention Strategies from Social and Behavioral Research. Institute of Medicine, National Academy Press, Washington, D.C. 2000. p. 283.

States may deliver FSNE to Program eligibles through other venues if 1) the audience meets the general low-income standard (i.e. > 50% of persons have household incomes of ≤ 185% of the FPG) and 2) they have an approved exclusivity waiver. Examples of such venues may include schools, child care centers, Summer Food Service Program sites, community centers, and grocery stores. FSNE State Plan Guidance will explain the required documentation needed for venues requiring a waiver. For any other venue than those previously described, States must prorate FSNE's share of the total cost based on the estimated number of FSP eligibles that may receive the nutrition education. Details pertaining to cost accounting are described in the State Nutrition Education Plan Guidance.

2. **Food Stamp Nutrition Education is a set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition-related behaviors conducive to health and well being for those on a limited budget.**

This is based on a widely accepted definition of nutrition education,[8] [9] modified to qualify that nutrition education for FSP eligibles considers their limited budgets and resources. Specifically, it emphasizes how Program eligibles can efficiently utilize their food resources, including food stamp benefits and as appropriate other FNS nutrition assistance programs, to facilitate consistent access to nutritious foods.

3. **Food Stamp Nutrition Education has the greatest potential impact on the nutrition-related behaviors of the overall food stamp population when it targets women and children in food stamp eligible households.**

Despite an increasing investment in FSNE, budgeted State and Federal funds for FSNE totaled less than $19.00 per FSP participant in FY 2004. To get the most out of this modest investment, FNS encourages States to focus their resources on changing the nutrition-related behaviors of key subsets of the food stamp population. Specifically, FNS encourages targeting first, women and then children in households participating in the FSP.

Women are viewed as gatekeepers of what food is purchased. The grocery industry reports that 69% of primary shoppers are female heads of household.[10] A recent survey by the American Dietetic Association Foundation reports on the key role, mothers have as models for their children's eating habits.[11] Parents point out that children and teenage youth affect family grocery and meal choices.[12] Together, mothers and their children make or influence food purchases and meal decisions.

Targeting FSNE to these two groups captures a majority of food stamp recipients. In FY 2003, 21% of food stamp participants, or almost five million, were women living in households with children. An

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[8] Green LW, Kreuter MW. Health promotion planning: an educational and environmental approach. Mountain View, CA: Mayfield, 1991.

[9] Society for Nutrition Education. Joint position of Society for Nutrition Education (SNE), The American Dietetic Association (ADA), and the American School Food Service Association (ASFSA); school-based nutrition programs and services. J Nutr Educ 1995; 27:58-61.

[10] Progressive Grocer Annual Report, April 2003.

[11] "Children's Role Models for Health: Parents Outrank Others." Survey by American Dietetic Association Foundation, January 2003.

[12] Kraak, V. The Influence of Commercialism on the Food Purchasing Behavior of Children and Teenage Youth. Family Economics and Nutrition Review. 1998, 11 (3): 15-24.

additional 51% of participants were children. Further targeting may be necessary to ensure nutrition education has sufficient intensity.

FNS recognizes that women with children are also targeted, to varying degrees, by WIC and the Expanded Food and Nutrition Education Program (EFNEP). This shared targeting provides an opportunity to reinforce and build upon nutrition education messages across programs using multiple sources. FNS believes that this will increase the likelihood of positive changes in eating and nutrition-related behaviors for a significant portion of the FSP population and that effective State plans will duplicate this national focus. Furthermore, FSNE activities for children which include related parental activities hold greater promise of success because they reinforce nutrition messages in the home setting.

FNS' national focus on women and their children does not preclude States from also offering FSNE to other food stamp audience segments such as the elderly, men, or adults without children. A needs assessment of the food stamp eligible population will help States target FSNE effectively and efficiently to yield the greatest change in dietary behavior among the largest number of food stamp eligibles.

4. Food Stamp Nutrition Education uses science-based, behaviorally-focused interventions and can maximize its national impact by concentrating on a small set of key outcomes.

Current FNS policy calls for science-based food stamp nutrition education. FNS acknowledges that science-informed interventions based on the best available evidence may be used. This Guiding Principle clarifies the meaning of "science-based" to reflect FNS's expectation that FSNE operators focus on the following:

1. States demonstrate through research review or sound self-initiated evaluation, if needed, that interventions have been tested and demonstrated to be meaningful for their specific target audience(s), implemented as intended or modified with justification, and shown to have the intended impact on behavior.

2. States incorporate general education features that have been shown to be effective such as:
   - behaviorally-focused messages;
   - use of motivators and reinforcements that are personally relevant to the target audience;
   - use of multiple channels of communication to convey messages;
   - approaches that provide for active personal engagement; and
   - intensity/duration that provides the opportunity for multiple exposures to the message.

FNS encourages States to use a variety of approaches in their delivery of FSNE. Interactive group and one-on-one instruction and media campaigns are among the approaches used to deliver nutrition education to food stamp eligible audiences. Social marketing plays an important role in the design and implementation of many FSNE activities. This approach emphasizes:

- targeting an identified segment of the food stamp eligible audience;
- identifying nutrition needs of the target audience and associated behaviors and perceptions about reasons for and against changing behavior; and
- interacting with the target audience to test the message, materials, approach and delivery channel to ensure that these are understood and meaningful (are likely to lead to behavior change).

Social marketing and other behavior change models include intervention strategies at individual, organizational /institutional and societal levels. FNS recognizes the potential impact of environmental factors, including institution policy, neighborhood design, food access and advertising on eating and physical activity behaviors. However, many activities associated with environmental and policy changes are beyond the scope of FSNE and not allowable for reimbursement through the FSP. FSNE can help support State environmental changes, which target the food stamp eligible population, through health promotion efforts (e.g. promoting use of a walking trail, selection of healthy foods from vending machines, etc.) and by serving on relevant State and local advisory panels. Areas that, in general, fall outside the Agency's "reasonable and necessary" criteria include funding for infrastructure changes, like establishing Farmer's Markets or building sidewalks, and organized efforts to influence elected officials or lobbying for legislative/policy changes.

While there are many important nutrition-related issues that impact the food stamp eligible audience, FNS encourages States to focus their FSNE efforts on the following behavior outcomes:

- Eat fruits and vegetables, whole grains, and nonfat or low-fat milk or milk products every day. [13]
- Be physically active every day as part of a healthy lifestyle. [14]
- Balance calorie intake from foods and beverages with calories expended. [15].

These behaviors are associated with a reduced risk of some forms of cancer, type 2 diabetes, and coronary heart disease. It is appropriate to focus on these behavior outcomes for FSNE since low-income individuals often experience a disproportionate share of diet-related problems that are risk factors in the major diseases contributing to poor health, disability and premature death. Other science-based messages that are consistent with the current *Dietary Guidelines for Americans* and the USDA Food Guidance System are also allowable.

5. Food Stamp Nutrition Education can maximize its reach when coordination and collaboration take place among a variety of stakeholders at the local, State, regional and national levels.

There are many challenges that low-income people meet head-on every day in trying to achieve a healthy lifestyle. The likelihood of nutrition education messages successfully changing behaviors is increased when consistent and repeated messages are delivered through multiple channels.

Cross-program coordination and collaboration at the State and community levels include working together especially with other FNS programs toward a common goal to reinforce and amplify each other's efforts such as the FNS sponsored State Nutrition Action Plans (SNAPs). Collaborative projects necessitate commitments of staff support and time, as well as cost sharing among all involved entities.

To further support healthy lifestyles, State agencies are encouraged to provide wellness training for

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[13] 2005 Dietary Guidelines for Americans (DGAs) [5-13 servings (2 ½ -6 ½ cups) of fruits and vegetables each day; 3 servings (approximately 3 ounces) of whole-grains each day; and 2-3 servings (cups) of nonfat or low-fat milk or milk products each day.]

[14] 2005 DGAs [For adults - 30 minutes of at least moderate physical activity on most days and for children and adolescents – 60 minutes of moderate to vigorous physical activity on most days.]

[15] 2005 DGAs

human service professionals to increase their awareness of healthy eating and active living so that they may serve as models for the population being taught as well as for general overall health in their professions. Such training would not be a cost of FSNE per se, but would be an allowable FSP administrative cost similar to other training or personnel benefits.

Nutrition education providers and human services professionals are encouraged to:

- Work with other FNS nutrition programs to plan and deliver common behaviorally-focused nutrition messages to reach FSP eligibles using many outlets. FSNE providers are encouraged to participate in the State Nutrition Action Plan (SNAP) process that is promoted by FNS.
- Work with other State and community health providers, agencies, professional and industry groups, advocacy groups, and organizations to coordinate and deliver behavior focused messages on healthy eating habits and active lifestyles.
- Use available materials that have been tested during development for clarity and relevance to the target audience and can be customized to local needs.

6. Food Stamp Nutrition Education is enhanced when the specific roles and responsibilities of local, State, regional and national food stamp agencies and nutrition education providers are defined and put into practice.

Providing nutrition education to food stamp eligibles requires the cooperation and ongoing communication between Federal, State and local entities and the recognition that each of these sets of organizations has key roles and responsibilities as noted below. FNS also recognizes that there are many roles and responsibilities, such as program development, financial management, and training, which are common at all levels of FSNE operation.

FNS, USDA:

- Establishes FSNE policy and develops related guidelines and procedures, intervention programs and activities that address the highest priority nutrition problems and needs of the target audiences.
- Reimburses States for 50% of allowable, reasonable and necessary FSNE costs.
- Reviews and approves State FSNE plans.
- Monitors State FSNE projects.
- Leads the coordination of nutrition education and related efforts at the national and regional levels, including partnerships with other Federal agencies, appropriate national organizations and other public and private entities to address national priorities.
- Promotes and supports cross program collaboration and planning at State and local levels to ensure implementation of consistent and effective interventions.
- Aligns FSNE messages with all other FNS nutrition assistance program messages.
- Provides training and technical assistance to program providers at all levels including linking staff with appropriate resources.
- Develops and provides nutrition education materials for use with FSP eligibles.
- Oversees the collection and analysis of national FSNE data.
- Incorporates the Dietary Guidelines for Americans and the USDA Food Guidance System into FNS nutrition assistance programs.
- Promotes science-based decisions through technical assistance, standards for research, and support for sound and systematic evaluation.
- Provides employee wellness programs that could serve as models for State and local agencies.

State Food Stamp Program Agency:

- Works collaboratively across State agencies, especially those administering other FNS Programs and with other appropriate agencies to promote healthy eating and active living among food stamp eligibles.
- Develops a coordinated, cohesive State FSNE Plan that addresses national and state priorities and links FSNE to food stamp benefits.
- Provides leadership, direction and information to entities contracted to provide FSNE services to ensure that FSNE appropriately serves FSP eligibles and is consistent with FSNE policies.
- Submits a unified State FSNE plan to FNS and provides assurances that Plan activities comply with FSNE policies.
- Submits a final FSNE performance report to FNS each year.
- Monitors implementation of the State's approved FSNE Plan including allowable expenditures.
- Offers training to state/local office human services staff on the availability of FSP and FSNE services.
- Provides budget information to FNS as required.
- Collects and reports data regarding participation in FSNE and characteristics of those served.
- Considers offering wellness training to State/local office human services professionals.

State Nutrition Education Provider:

- Works with State FSP agency, other FNS Programs and other FSNE providers within the state to develop a single comprehensive State FSNE Plan that addresses national/state priorities, needs of food stamp eligibles and includes sound evaluation strategies.
- Works with other State and local agencies and with private agencies to promote healthy eating and active living among food stamp eligibles.
- Implements science-based nutrition education as specified in the approved State FSNE plan.
- Submits required reports according to timelines established by State FSP.
- Works with State Food Stamp agency to provide training to State/local office human services staff on the availability of FSNE services.
- Collects and reports data regarding participation in FSNE and characteristics of those served.

Local Food Stamp Office:

- Informs FSP participants and applicants of opportunities to participate in FSP services, including FSNE.
- Builds relationships with other local service providers (WIC, local health departments, school meals programs) so referrals of FSP participants to other nutrition and health related services can be made as appropriate.
- As space and resources allow, makes FSNE information and services available in the FSP office.
- Coordinates opportunities between food stamp outreach and nutrition education efforts, as appropriate and available.
- Participates in worksite wellness activities or community-based wellness programs, as appropriate and available.

Local Nutrition Education Provider:

- Delivers nutrition education services to food stamp eligibles according to approved FSNE plan.
- Helps food stamp eligibles understand how to eat a healthy diet on a limited food budget using food stamp benefits and managing their food resources.
- Uses appropriate educational strategies and implementation methods to reach food stamp eligibles.
- Collects and reports data regarding participation in FSNE and characteristics of those served.
- Builds relationships with other local service providers (WIC, local health departments, school meals programs) so referrals of FSP participants to other nutrition and health related services can be made as appropriate.
- Provides referrals to the FSP for low-income non-participants to access food stamp benefits, as appropriate.

Appendix I:
Education and Administrative Reporting System (EARS) Implementation Plan

Introduction

The Food Stamp Program (FSP) Education and Administrative Report System (EARS) is an annual form completed by FSP State agencies. It collects uniform data and information on nutrition education activities funded by the FSP during the prior fiscal year. The data and information collected through the report will inform management decisions, support policy initiatives, provide documentation for legislative, budget and other requests, and support planning within the agency. Data elements to be collected include demographic characteristics of participants receiving nutrition education benefits, topics covered by the educational intervention, education delivery sites, education strategies, and resource allocation.

FNS recognizes that moving to this new report may be easier in some States than others. Consequently, FNS will allow a two-year implementation period for the EARS. During this two-year period, State agencies and implementing partners are expected to be create or modify elements of their current data collection systems so that by the end of the implementation period, reliable data can be submitted on all applicable elements of the EARS form.

The State's EARS Implementation Plan should clearly outline when the State will be reporting data and information for each aspect of the EARS form.

- State agencies should have submitted an EARS implementation timeline as part of their 2008 FSNE plan.
- By FY 2010, all State agencies should report all applicable components of EARS.
- The OMB approved EARS form No. 0584-0542 Expires 08/31/2010 is provided at the end of this Appendix.

First Year Implementation (FY 2008)

- States should have submitted data for the expenditure section in FY 2008: question 9 (expenditures by source of funding) and question 10 (expenditures by category of spending).
- The web-based reporting system will be available from October 15, 2008 to December 30, 2008.
- EARS is due by December 31, 2008.
- FNS will conduct multi-level, ongoing training to assist States with smooth implementation of EARS. Trainings are scheduled to begin January 2008.

Second Year Implementation (FY 2009)

- FNS continues multi-level trainings and technical assistance (TA). These trainings are used to address ongoing questions that emerge during implementation.
- State agencies conduct training and make needed adjustments in the State data collection processes in order to capture data for EARS.
- State agencies submit EARS data per their timeline using the web base submission system by 12/31/09

Third Year Implementation (2010)

- FNS continues multi-level training and TA. These trainings are used to address ongoing questions that emerge during implementation.
- State agencies continue to conduct training and make needed adjustments in the State data collection processes in order to capture data for EARS.
- State agencies submit all applicable components of EARS data using the web base submission system by 12/31/10

Both the State Agency and its FSNE implementing agencies play critical roles about EARS. The State Food Stamp Agency is responsible for ensuring that accurate and complete information is collected and submitted for EARS by the established timeline.

State Food Stamp Agency is responsible for:

- Participating in Regional EARS trainings;
- Providing training and technical assistance to FSNE implementing agencies regarding the collection of EARS data;
- Reviewing and monitoring FSNE implementing agencies' collection for EARS to ensure that it is accurately collected and reported;
- Using the EARS data, if desired, to inform the annual FSNE State Plan process, generate reports for State partners and stakeholders, and generate awareness regarding FSNE services in the State.
- Submitting the EARS form using the online submission system.

FSNE Implementing Agencies are responsible for:

- Attending any State or Regional trainings on EARS.
- Collecting, compiling and submitting accurate EARS data to the State Agency.
- Providing training and technical assistance to local FSNE providers regarding the collection of EARS data;
- Using EARS data to inform the planning and management process as appropriate;
- Reviewing and monitoring the collection of EARS data at the project level to ensure that it is accurately collected and reported in the manner specified on the EARS form.

Food Stamp Nutrition Education
EARS Reporting Form

OMB BURDEN STATEMENT: According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-XXXX. The time to complete this information collection is estimated to average 54 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. OMB #0584-0542 expires 08/31/2010.

State: _____ Federal Fiscal Year: _____

Number of Implementing Agencies*: _____

Name of Each Implementing Agency*

***** An implementing agency is defined as an organization that has a contract/formal agreement with the State Food Stamp Program Agency to develop and deliver nutrition education activities in the state. Attach additional pages if necessary.

DIRECT EDUCATION:

Items #1-6 ask for information about participants and activities associated with direct food stamp nutrition education. **Direct Education** is defined as interventions where a participant is actively engaged in the learning process with an educator and/or interactive media. Direct education provides an opportunity to obtain information about individual participants. For an activity to qualify as direct education, information on the number of individuals, Food Stamp Program participation status, age, gender, and race/ethnicity must be collected.

Example 1: An implementing agency conducts a series of nutrition sessions designed to increase fruit and vegetable intake. The educators collect enrollment data including name, age, race, ethnic group, Food Stamp participation and gender.

Example 2: The implementing agency provides nutrition education via kiosks at several locations. Participant using the kiosks provides identifying information including their Food Stamp status, ethnicity, age and gender by entering this data or by using codes that can be linked to this information by the implementing agency.

Situations that would not count as "direct education" include cases where an individual obtains nutrition education or materials or listens to a session but no demographic information is captured about the individual. This would count as indirect education.

Direct Education: FSNE Participants and Contacts

1a. Direct Education: FSNE PARTICIPANTS by Age and Food Stamp Program Status

Reporting an unduplicated count of direct education participants means providing the number of different individuals who receive any FSNE direct education. Each individual counts as one participant, regardless of the number of times he or she has participated in direct education activities. You are encouraged to provide actual unduplicated counts but if you are unable, you should estimate the number of individuals served.

- For Question 1a, indicate below if you are providing actual unduplicated counts or an estimate of FSNE direct education participants.

___ Actual Counts of Participants (unduplicated)

___ Estimated Counts of Participants

		A	B	C	D	E
		Less than 5 Years	**5-17 Years** **Grades K-12**	**18-59 Years**	**60 Years or More**	**All Ages Combined**
1	**Number of Food Stamp Recipients in FSNE**					
2	**Number of All Other Participants in FNSE**					
3	**Total Number of FSNE Participants**					

If you reported an estimate in Question 1a, please describe in 100 words or less the methods used to estimate the number of participants.

1b. Direct Education: FSNE CONTACTS by Age and Food Stamp Program Status

A "FSNE contact" is defined as an interaction in which a FNSE participant participates in a direct education activity. Each FSNE participant may have one or more FSNE contacts.

- For Question 1b, indicate below if you are providing actual counts or an estimate of FSNE direct education contacts.

___ Actual Counts of Contacts

___ Estimated Counts of Contacts

		A	B	C	D	E
		Less than 5 Years	**5-17 Years** **Grades K-12**	**18-59 Years**	**60 Years or More**	**All Ages Combined**
1	**Contacts with Food Stamp Recipients in FSNE**					
2	**Contacts with All Other Persons in FNSE**					
3	**Total Contacts with FSNE Participants**					

If you reported an estimate in Question 1b, please describe in 100 words or less the methods used to estimate the number of contacts.

Instructions for Question 1a and 1b

- Row 1: Enter **the total number of participants (1a) and contacts (1b) who are Food Stamp recipients** by each age range and for all ages combined (Row 1; Columns A-E).

- Row 2: Enter the **total participants (1a) and contacts (1b) for all other (non- food stamp) persons** by each age range and for all ages combined (Row 2; Columns A-E). This includes persons who are eligible non-participants with respect to the Food Stamp Program combined with persons who are not eligible for the Food Stamp Program.

- Row 3: Enter the **total participants (1a) and contacts (1b) for FSNE by age category** (Row 3; Columns A-E). Each number in Row 3 should equal the sum of Rows 1 and 2 in that column.

Special Circumstances

○ If necessary, determine food stamp status among children (columns A and B) who receive FSNE services in school and child care settings by multiplying the number of children participating in FSNE at each school or child care facility by the percent of students enrolled in the **FREE** school lunch program.

Example: An elementary school program has 100 children participating in FSNE and the school's free lunch participation rate is 60%. In the "5-17 Years (grade K-12)" column, report 60 students under "Number of Food Stamp Participants in FSNE" and 40 students under "Number of All Other Participants in FSNE" for a total of 100 students.

○ Teen-age FSNE participants should be counted by their age for Question 1 even if they are parents.

Example: If the teen parent is 16 years old, they should be counted under Column B, 5-17 Years (Grades K-12). If the teen is 19 years old, they should be counted under Column C 18-59 Years.

2a. Direct Education: FSNE PARTICIPANTS by Gender

- For Question 2a, indicate below if you are providing an unduplicated count or an estimate of FSNE direct education participants.

___ Actual Counts of Participants (unduplicated)

___ Estimated Counts of Participants

		A	B
		Female	**Male**
1	**Number of FSNE Participants**		

If you reported an estimate in Question 2a, please describe in 25 words or less the methods used to estimate the number of participants.

2b. Direct Education: FSNE CONTACTS by Gender

- For Question 2b, indicate below if you are providing actual counts or an estimate of FSNE direct education contacts.

___ Actual Counts of Contacts

___ Estimated Counts of Contacts

		A	B
		Female	**Male**
1	**Number of FSNE Contacts**		

If you reported an estimate in Question 2b, please describe in 25 words or less the methods used to estimate the number of contacts.

Instructions for Question 2a and b

Enter the DIRECT EDUCATION participants (2a) and contacts (2b) by gender in Row 1; Columns A and B of Table 2a and 2b. The total of A and B in Table 2a should equal the total number of FSNE participants in Question 1a, Row 3, Column E. The total of A and B in Table 2b should equal the total number of FSNE contacts in Question 1b, Row 3, Column E.

3. Direct Education: Race and Ethnicity

- For Question 3, indicate below if you are providing actual unduplicated counts or an estimate of FSNE direct education participants.

___ Actual Counts of Participants (unduplicated)

___ Estimated Counts of Participants

		A	B	C
		Number of Hispanic or Latino FSNE Participants by Race	**Number of Non-Hispanic/Latino FSNE Participants by Race**	**Total by Race**
Individuals Reporting ONLY ONE RACE	**1. American Indian or Alaska Native**			
	2. Asian			
	3. Black or African American			
	4. Native Hawaiian or Other Pacific Islander			
	5. White			
Individuals Reporting MULTIPLE RACES	**6. American Indian or Alaska Native and White**			
	7. Asian and White			
	8. Black or African American and White			
	9. American Indian or Alaska Native and Black or African American			
	10. All Others Reporting More than One Race			
	11. TOTAL by ethnicity			

Instructions for Question 3

- For purposes of this form, "Hispanic or Latino" is an ethnic group, not a race.

- Column A: Report the number of Hispanic or Latino FSNE participants for each racial category listed in Rows1-11. Specifically, in Rows 1-5, report the number of FSNE participants who are of Hispanic or Latino ethnicity and report only one race. In Rows 6-10, report the number of FSNE participants who are of Hispanic or Latino ethnicity and report two or more races. Use Row 10 for all FSNE participants who are of Hispanic or Latino ethnicity and describe themselves with a racial combination not included in Rows 6-9. For Row 11, enter the sum of Rows 1-10 under Column A.

- Column B: Report the number of FSNE participants who are *not* of Hispanic or Latino ethnicity for each racial category listed in Rows 1-10. Specifically, in Rows 1-5, report the number of FSNE participants who are not of Hispanic or Latino ethnicity and report only one

race. In Rows 6-10, report the number of FSNE participants who are not of Hispanic or Latino ethnicity and report two or more races. Use Row 10 for all FSNE participants who are not Hispanic or Latino ethnicity and describe themselves with a racial combination not included in Rows 6-9. In Row 11, enter the sum of Rows 1-10 under Column B.

- Column C: Add the number of FSNE participants reported in Column A and Column B for each row. For Column C, Row 11, add the numbers reported in Column C.

Example 1: A FSNE participant who reports they are Hispanic and Black is counted in Column A, Row 3.

Example 2: A FSNE participant who reports being White, Asian, and Black but not Hispanic is counted in Column B, Row 10.

4. Direct Education: Number of FSNE Delivery Sites by Type of Setting

Type of Setting	Number of Different Sites/ Locations	Type of Setting	Number of Different Sites/Locations
Adult Education & Job Training Sites		**Libraries**	
Adult Rehabilitation Centers		**Churches**	
Worksites		**Public/Community Health Centers**	
Community Centers		**Public Schools**	
Elderly Service Centers		**Head Start Programs**	
Emergency Food Assistance Sites		**Other Youth Education Sites** (includes Parks and Recreation)	
Extension Offices		**Shelters**	
Farmers Markets		**WIC Programs**	
Food Stamp Offices		**Other (please specify):**	
Food Stores		**Other (please specify):**	
Public Housing		**Other (please specify):**	
Individual Homes		**Other (please specify):**	

Instructions for Question 4

For each type of DIRECT EDUCATION setting used, enter the number of different sites/locations used within the State. Record each site only ONCE on this form.

Example 1: FSNE is provided to residents of a shelter that is located in a local church. Record this site under "Church".

Example 2: FSNE is provided to participants in Head Start which is operating in the local elementary school which also has FSNE activities with the elementary school students. Record this site only once under "Public School".

- If you provide interactive multimedia education, please report locations where kiosks/computers are available.

Example 3: FSNE is provided through interactive multimedia via kiosks in 15 food stores and 10 worksites that have no other FSNE activities. These kiosks should be added to the numbers of sites reported under the food stores and worksite categories in Question 4.

5. Direct Education Programming Format

		A	B	C
	Format	**Number delivered**	**Time range per session (in minutes)**	**% delivered by interactive multimedia**
1	**Single session**			
2	**Series – 2 to 4 sessions**			
3	**Series – 5 to 9 sessions**			
4	**Series – 10 or more sessions**			

Instructions for Question 5

- For Rows 1-4, Column A, enter the number of single sessions, the number of 2-4 session series, the number of 5-9 session series, and the number of series with 10 or more sessions delivered.
- For Rows 1-4, Column B, enter the time range per session in minutes.
- For Rows 1-4, Column C, enter the percent of Column A delivered by interactive multimedia lessons/modules.

Example 1: *A state reports that 40 single sessions were delivered ranging in time from 45-60 minutes and that 10% were delivered by interactive multimedia. Row 1 of the form would show:*

		A	B	C
	Format	**Number delivered**	**Time range per session (in minutes)**	**% delivered by interactive multimedia**
1	Single Session	40	45-60 minutes	10%

6. Primary Content of Direct Education

CODE:	CODE:	CODE:	CODE:

INSTRUCTIONS for Question 6

- Identify up to four educational topic areas of emphasis from the list below. These four topic areas should reflect those areas given most emphasis (e.g. taught most frequently) in your State. Record only one code per box. **DO NOT REPORT Food Stamp Program OUTREACH IN THIS TABLE.**

A. FAT FREE & LOW FAT MILK OR EQUIV (& ALTERNATE CALCIUM SOURCES)
B. FATS AND OILS
C. FIBER-RICH FOODS
D. FOOD SHOPPING/PREPARATION
E. FRUITS & VEGETABLES
F. LEAN MEAT AND BEANS
G. LIMIT ADDED SUGARS OR CALORIC SWEETNERS
H. MYPYRAMID – HEALTHY EATING PLAN
I. PHYSICAL ACTIVITY
J. PROMOTE HEALTHY WEIGHT
K. SODIUM & POTASSIUM
L. WHOLE GRAINS
M. FOOD SAFETY
N. OTHER (specify): _____(possible for electronic form)
O. OTHER (specify): _____
P. OTHER (specify): _____
Q. OTHER (specify): _____

SOCIAL MARKETING INITIATIVES:

Item #7 asks for information about FSNE social marketing initiatives. **Social Marketing** is defined as a consumer-focused, research-based process to plan, implement and evaluate interventions that are designed to influence the voluntary behavior of a large number of people in the target audience (adapted from Alan Andreasen 1995 and Social Marketing Division of Society for Nutrition Education).

For an activity to qualify as a social marketing campaign, the initiative being reported must have included all of the following steps:

- Identified a specific segment of the food stamp/low income population to target.
- Identified the specific nutrition needs of the target audience, associated target behavior(s), and the target audience's reasons for and against changing behavior.
- Interacted with the target audience to see if the message, materials, and delivery channel are understood and meaningful (would lead to behavior change).

States that conduct social marketing campaigns that include both direct and indirect education activities may elect to report these under these categories. However, if direct and indirect education activities are reported in the "direct education" section or the "indirect education" section, they should not be reported in the social marketing section because that would result in a duplicate count.

7. Description of ALL Social Marketing Campaigns

Attach an additional form to record data, if there are more than five campaigns.

A. Name of Campaign	B. Current Year of Campaign	C. Major Campaign Activities for Current Year *Use Codes*	D. Priority Population(s) *Use Codes*	E. Estimated Number. of FSP Recipients Reached	F. Estimated Number of Other Low Income Persons Reached	G. Total Estimated Reach (Low-Income, FSP Recipients AND All Others
1						
2						
3						
4						

5						

Instructions for Question 7

For each social marketing campaign being planned, under development or operating:

- Column A: Enter the name of all FNS approved social marketing campaigns.
- Column B:. Enter the current campaign year for this annual reporting cycle. Be sure to include planning and development phases.
  Example: If this is the third year of a five year campaign, record 3 in Column B.

- Column C: Enter **one or more** of the following codes that describe major phases of campaign activities:

  - P=Planning (includes market and formative research),
  - D=Developing (includes campaign/materials design and consumer testing),
  - I =Implementing
  - E=Tracking and Evaluation

- Column D: Enter **all** of the appropriate codes describing the priority population (target audience) that this campaign reached during this fiscal year*:*

  - Ethnicity: F=Hispanic or Latino
    G= Not-Hispanic or Latino

  - Race: A= American Indian or Native Alaska
    B= Asian
    C= Black or African American
    D= Native Hawaiian or Other Pacific Islander
    E= White

  - Gender: H=Female
    I = Male

  - Age: J = All ages
    K= Less than 5 years of age
    L= 5 to 17 years of age
    M=18 to 59 years of age

N= 60 years of age or older

For Columns E, F and G, enter the number of people reached, as estimated from demographic or marketing data or other sources.

- Column E: Enter the estimated number of Food Stamp Program recipients reached this reporting year through this campaign
- Column F: Enter the estimated number of low-income persons (EXCLUDING Food Stamp recipients) reached through this campaign this reporting year.
- Column G: Enter the total estimated number of people (low-income, Food Stamp recipients AND all others) reached this reporting year.

Example 1: The radio station that broadcasts social marketing nutrition messages has provided demographic statistics to the implementing partner showing the income range of their listening audience. The data show that roughly 20% of the audience or 400 people would not qualify for Food Stamps. The estimated count of 400 people should be counted under column G in Item 7 of the form.

Example 2: Nutrition education is conducted at a local grocery store in a low-income neighborhood and 200 people attend. Census track data is examined and shows that 55% of the population served by the store has income below 130% of the poverty level and 30% has income between 130% and 185% of the poverty level with the remaining 15% having income over 185% of the poverty level. In Column E, 110 (55% of 200 participants) should be included, 60 should be included in Column F (30% of 200) and 200 should be reported in Column G.

7. Continued-Description of ALL Social Marketing Campaigns

	H. Primary Intervention Levels *Use Codes*	I. Key Messages *Use Codes*	J. Primary Intervention Channels *Use Codes*	K. Total Expenditure for Social Marketing Campaign for Reporting Year	L Total Federal FSNE Expenditure for Reporting Year
1				$	
2				$	
3				$	
4				$	
5				$	

Instructions for Question 7

- Column H: Enter **one or more codes** describing each campaign's level(s) of intervention:

  - A=Individual
  - B=Interpersonal (groups)
  - C=Institution/Organization
  - D=Community
  - E=All Levels
  - F=Other – please specify

- Column I: Enter **up to three codes** for each campaign's priority education topics/messages. Use the codes listed in the Instructions for Item # 6.
- Column J: Enter **all of the codes** corresponding to the intervention channels used in each campaign:

  - A=Nutrition Education Radio Public Service Announcement (PSA)
  - B=Nutrition Education TV Public Service Announcement (PSA)
  - C=Nutrition Education articles
  - D=Billboards, bus wraps, or other signage
  - E=Participation in community events/fairs
  - F=Sponsor community events/fairs
  - G=Fact sheets/pamphlets/newsletters
  - H=Posters
  - I=Calendars
  - J=Promotional materials w/nutrition messages (pens, pencils, wallet reference cards, magnets, cups, etc)
  - K=Website
  - L=Electronic (email) materials/info distribution
  - M=Videos/CD-Rom
  - N=Retail/point-of-purchase activities
  - O=Other – please specify

- Column K: Enter the **total expenditure (include all State and Federal FSNE and any other sources of funds)** for the campaign this reporting year.
- Column L: Enter the **Federal FSNE expenditures** for the campaign this reporting year.

INDIRECT EDUCATION:

Item #8 asks for information about food stamp indirect education. **Indirect Education** is defined as the distribution of information and resources, including any mass communications, public events and materials distribution that DO NOT meet the definitions of Direct Education or Social Marketing Campaigns. Mass communication, public events and material distribution efforts that don't meet the definition of social marketing should be reported here.

8a. Types of Materials Distributed

	Check if applicable
Fact sheets/ pamphlets/newsletters	
Posters	
Calendars	
Promotional Materials w/nutrition messages (pens/pencils/wallet reference cards/magnets/cups/etc)	
Website	
Electronic (Email) materials/info distribution	
Videos/CD Rom	
Other	

Instructions for Question 8a

Check all methods/materials used for indirect education.

8b. Estimated Size of Audiences Reached through Communication and Events

	Estimated No. of target population reached	Source of Data
Nutrition Education Radio PSAs		
Nutrition Education TV PSAs		
Nutrition Education Articles		
Billboard, Bus or Van Wraps, or Other Signage		
Community Events/Fairs -- in which Participated		
Community Events/Fairs -- Only Sponsored		
Other		

Instructions for Question 8b

For each type of communication channel and event enter the estimated number of individuals in the target population(s) reached and the code of the source of the data used to tabulate the estimate.

1 = commercial market data on audience size
2 = survey of target audience
3 = visual estimate
4= other

9. Expenditures by Sources of Funding *(See Instructions)*

	Expenditures for Reporting Year
I. Public Cash Contributions -- State and Local Tax Revenue **only**	$
2. Public and Private Cash Contributions -- **other than** State and Local Tax Revenue	$
3. Sum of Lines 1 & 2	**$**
4. Public In-Kind Contributions (non-cash)	$
5. Private Cash Contributions to State Food Stamp Agency only	$
6. Indian Tribal Organization Contributions	$
7. Sum of Lines 4, 5 & 6	**$**
8. Federal Reimbursement	**$**
9. TOTAL FSNE EXPENDITURES: Sum of Lines 3, 7 & 8	**$**

Instructions for Question 9

All dollar amounts recorded in item #9 should reflect actual expenditures NOT those initially budgeted.

- Line1: Enter the dollar value of expenditures paid only with State and local tax revenue designated specifically for FSNE activities.
- Line 2: Enter the dollar value of expenditures paid with public and private cash contributions. These are contributions that are received by state implementing agencies or their subcontractors other than State and local tax revenues designated specifically for FSNE activities. These are not from State and local tax revenues.
- Line 3: Enter the sum of lines 1 and 2 in line 3.
- Line 4: Enter the dollar value of expenditures paid with public in-kind (non-cash) contributions. These contributions are defined as goods or services provided by a state or local agency for which no cash funds are transferred and no out-of-pocket cost is incurred by the contributing agency. Typically, in-kind contributions are the value of goods or services provided by volunteers.
- Line 5: Enter the dollar value of expenditures paid with private cash contributions made to the State Food Stamp Office/Agency These contributions are funds provided by non-governmental groups. They may include cash provided to the State or outlays made directly by a non-governmental organization to cover approved FSNE costs.
- Line 6: If applicable, enter the dollar value of expenditures paid with Indian Tribal Organization (ITO) contributions. Although technically ITO contributions are Federal funds, for the purposes of FSNE reimbursement, they are considered state match.
- Line 7: Enter the sum of lines 4, 5 and 6 in line 7. This may be less than 50% of the Total FSNE Expenditures in line 9 when there is an ITO contribution because FNS reimburses allowable activities conducted on Indian reservations at the 75% rate.
- Line 8: Enter the total amount of the federal reimbursement for FSNE; this is the total amount chargeable to FNS. It may be greater than 50% of total outlays when there is an ITO contribution because FNS reimburses for allowable activities conducted on Indian reservations at the 75% rate.
- Line 9: Enter the sum of lines 3, 7 and 8 to record Total (allowable) FSNE Expenditures. This total should equal Line 3 in Question 10, Expenditures by Category of Spending.

10. Expenditures by Category of Spending (*See Instructions below)*

Cost breakouts for item #10 may be the actual allocation or estimated.

1. Total Expenditures for FSNE Program Delivery	$
2. Total Expenditures for Administrative Costs	$
3. TOTAL FSNE Expenditures (State and Federal)	**$**

Data provided in this table are (check one): ____ actual or ____estimated based on FTE allocation.

Instructions for Question 10

Costs reported in this table may be calculated based on: 1) the actual expenditures associated with each component described above; or, 2) be estimated based on multiplying the percentage of total FTE time spent on nutrition education versus administration to any cost component that is not tracked separately as a delivery or administrative expense.

Example: 45% of FTEs are for administrative functions. Apply this to the total expenditures and you can estimate your Total Expenditures for Administrative Costs, line 2.

Line 1: Count all of the following as Nutrition Education Program Delivery Expenditures:

- Dollar value of salaries and benefits associated with staff time spent providing approved and allowable FSNE activities.
- Cost of all food demonstration supplies.
- Cost of purchasing and/or developing educational materials (literature/materials/audiovisuals).
- Cost of developing and implementing media campaigns.
- Dollar value of the pro-rated costs of space used to deliver FSNE.
- Cost of any FSNE evaluation efforts.
- Cost of traveling to deliver FSNE services.
- Cost of training for nutrition education providers.
- Indirect costs (must be proportionate to time spent to delivery of FSNE)
- Other overhead charges (space, HR services, etc).

Line 2: Count all of the following as FSN Administrative Expenditures:

- Dollar value of salaries and benefits associated with staff time spent on FSNE administration not on nutrition education. (*example: State FSP/IA/Project staff, support staff*).
- Cost of training to performing administrative functions like record keeping, accounting, etc.
- Cost of reporting.
- Cost of equipment and office supplies.
- Operating Costs.
- Indirect Costs for those administrative staff not covered above.
- Other overhead charges associated with administrative expenses (space, HR services, etc).

Line 3: Sum of lines 1 and 2. This total should equal the total reported in Line 9 of Question 9, Expenditure by Sources of Funding.