

<b>II. Program Administration Section</b>
<b>100. USDA Guidance - Allowable and Unallowable Costs</b>

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### **101. General Information**

USDA SNAP-Ed rules for allowable and unallowable costs apply to all activities and supporting materials. These rules also apply to all SNAP-Ed funded subcontractor and mini-grantee activities. Furthermore, all costs must be reasonable (in cost and scope) and necessary, and targeted to SNAP-Ed eligible Californians.

The allowable and unallowable costs change periodically due in part to SNAP-Ed guidance changes, as well as California Department of Public Health (CDPH) direction. If there are changes in the [USDA Supplemental Nutrition Assistance Program- Education Plan Guidance](#) that impact the allowable and unallowable costs, the State *Network* website will be updated with a revised allowable and unallowable costs document and contractors will be notified via email. The contractor, inclusive of subcontractors and mini-grantees, is required to comply immediately with any and all such changes.

Additionally, CDPH may also institute State guidelines governing the allowable activities of *Network* contractors. Changes in this guidance will be delivered via an electronic Program Letter. The Contractor, inclusive of subcontractors and mini-grantees, is required to comply immediately with any and all such changes.

The State *Network* maintains copies of [Program Letters](#) as well as the most current version of the [USDA Allowable and Unallowable Costs Chart on the State \*Network\* website](#).

For questions related to allowable costs and the reasonable and necessary criteria, please contact your assigned Regional Program Manager.

### **102. General Audience *Network* Targeting**

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

#### American Communities Survey

Census tract data from the American Communities Survey (ACS) is used to document eligibility, with qualifying census tracts being those where at least half of the population is at or below 185% FPL. ACS eligibility information for All Races  $\leq 185\%$  [FPL](#) is currently available on the State *Network* website. Ethnic-specific qualifying data for  $\leq 100\%$  [FPL](#) is also available on the State *Network* website. Additional ethnic-specific ACS data for higher income levels is

anticipated to be available in early 2012; contractors will be notified via email and the *Network* website will be updated to reflect the additionally qualified census tracts and blocks (if possible).

*Note:* 2000 Census Tract Data is no longer an acceptable source for targeting information.

Proxy Sites:

The USDA SNAP-Ed Guidance also allows for qualification of activities outside of census tracts and income verification through the provision of activities at proxy sites. These sites are specified by category in the USDA SNAP-Ed Guidance, and include: SNAP/TANF offices, qualifying public housing, and food banks, food pantries, and soup kitchens in conjunction with the distribution of foods to needy persons at these sites. USDA may authorize additional proxy sites during the course of the contract year; should that occur contractors will be notified via email.

*Note:* Costs associated with food distribution are not reimbursable SNAP-Ed expenses.

Free & Reduced Price Meal Program Participation:

To qualify SNAP-Ed activities delivered at schools, each school must be located in a qualifying census tract/block or have at least 50 percent of the students enrolled in the Free or Reduced Price School Meal Program. Qualifying information provided at the school district level does not demonstrate eligibility.

[Free and reduced price meal participation](#) information is available on the State *Network* website, the [California Department of Education website \(CDE\)](#), or from the School Foodservice Director.

Household Income Verification:

SNAP-Ed activities may also be qualified through determination of household income. This can be done in two ways. The first is by identifying participation in a program with equivalent income requirements, such as Women, Infants, and Children (WIC)s Supplemental Food Program and Head Start, for example. The second is through verification of participant-level income. This may be done via an anonymous survey; however, contractors should contact their Regional Program Manager for approval prior to implementing participant-level surveys.

**103. Fruit, Vegetable & Physical Activity Campaign- and Program-Specific Targeting:**

*Network* campaigns and programs use a variety of methods to ensure appropriate targeting of activities. These methods include:

- For all campaigns and programs except the *Worksite Program*, a site can be qualified using American Community Survey 2005-2009 aggregate data as described in [Section 102](#) above. The site must be located in a census tract or census block with at least 50% of the population (All Races) at or below 185% FPL. For the *Latino Campaign* and *African American Campaign*, sites may also qualify if at least 50% of the Hispanic/Latino or African American/Black population is at or below 100% FPL. Currently, data by race/ethnicity is only available at 100% FPL and at the census tract level.
- For the *Retail Program*, retail sites may qualify based upon their geographic location using census data as described above. Additional sites may qualify based on their inclusion in a USDA-approved list provided annually by the *Retail Program*. If a site is being used to meet scope of work requirements targeted to the Latino or African American population and All Races census data or the USDA-approved list are used to qualify the site, then a consumer

survey must also be used to demonstrate appropriate targeting by race/ethnicity. For more information, see the *Retail Program Manager's Guide*.

- Additional sites outside of qualifying census tracts/blocks may qualify if other data is available to verify the income level of participants. Examples include proxy sites as identified in the USDA SNAP-Ed Guidance, sites with local data that can be used to verify participant income, and sites at which a consumer survey has been conducted. The *Network Consumer Survey* with income-related questions must be used and appropriate protocols must be followed. More information is available in the *Latino Campaign* and *African American Campaign Manager's Guides*.
- For the *Latino Campaign* and *African American Campaign*, *Regional Networks* should make every effort to ensure that activities are targeted to the appropriate race/ethnic group. At this time, the campaigns do not require consumer surveys to verify race/ethnic targeting in any channel other than the retail channel.
- The *Worksite Program* may not qualify sites using census data. Sites must be qualified using USDA-approved methods. Currently, these include having an employee population with at least 50% of the employees earning a wage of \$9.63 per hour or less or conducting an employee survey to ensure that at least 50% of employees are at or below 185% FPL. For more information, see the *Worksite Program Manager's Guide*.