



## ***Network for a Healthy California*** **Allowable/Unallowable Activity**

The following activities have been deemed unallowable or questionable. Work with your group to determine how you can turn these into allowable activities.

### **1. Lead the implementation of a school wellness committee to increase the availability of fruits and vegetables in the cafeteria.**

Possible Solution:

Participate in but not lead the implementation of a school wellness committee to increase the availability of fruits and vegetables in the cafeteria.

Rationale:

*Network* Contractors are allowed to participate but not lead the development of implementation of school wellness committees or school health councils for the segment of the community who are FSNE eligible.

Source: Allowable/Unallowable Chart - Systems, Policy and Environmental Education; FSNE Plan Guidance FFY09 page 65.

### **2. Provide ongoing physical activity (PA) demonstrations for after school staff or conduct exercise classes in conjunction with nutrition education in schools programs.**

Possible Solution:

Provide one instructional physical activity demonstration for after school staff as a part of a nutrition education training session.

Rationale:

Physical activity promotion as a component of broader nutrition activities such as providing FSNE eligible persons and similar low-income persons with information and encouragement to exercise is allowable. This may include 1) promotion of PA messages/PA recommendations contained in the current Dietary Guidelines for Americans, 2) PA demonstrations (instructional in nature, on a one-time basis for clients or staff), 3) provision of technical assistance and 4) community resource information (such as free or low-cost local fitness events) in order to encourage program participants to engage in regular PA.

AND

Ongoing exercise or PA classes (e.g., yoga classes, walking clubs, sports teams, running classes, gym classes) and personnel costs for conducting or maintaining exercise or PA classes are unallowable.

Source: Allowable/Unallowable Chart - Physical Activity Promotion.

### **3. Encourage students to join the National School Lunch Program.**

Possible Solution:

Discuss the health and possible academic performance benefits when students eat a healthy diet and how participating in the school lunch, breakfast, and summer meals programs can

help your child achieve a healthy diet. Provide basic information on where parents can go to sign up for these programs.

OR

Provide a list of food assistance programs (National School Lunch Program, School Breakfast Program) to parents.

Rationale:

FSNE funds may not be used to actively promote and conduct outreach for the Food Stamp Program, the National School Lunch Program, the School Breakfast Program, and other Food and Nutrition Services programs. Brief messages identifying these as sources of food assistance are allowable.

Source: Allowable/Unallowable Chart - Food Stamp Promotion and Food Stamp Outreach.

**4. Provide nutrition counseling to diabetes patients.**

Possible Solution:

Conduct nutrition classes to FSNE eligible persons promoting increased consumption of fruits and vegetables to prevent or postpone the onset of chronic diseases, such as heart disease, type 2 diabetes, and hypertension.

Rationale:

Secondary prevention interventions and Medical Nutrition Therapy are unallowable. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. Medical Nutrition Therapy involves the assessment of nutritional status and the assignment of diet, counseling, and/or specialized nutrition therapies to treat an individual's illness or condition; it is conducted in association with a prescription from a qualified professional as a physician or nurse practitioner.

Source: Allowable/Unallowable Chart - Medical Equipment and Health Services

**5. Purchase and distribution of the following brochures: "Getting to the Heart of Diabetes," "Hypertension," and "Low-Sodium Diets."**

Possible Solution:

Purchase and distribution of brochures that focus on primary prevention such as the *Network's* Fruits and Vegetables (or Physical Activity) for Your Health, Your Neighborhood and Your Life  
OR

Conduct nutrition classes to FSNE eligible persons promoting increased consumption of fruits and vegetables to prevent or postpone the onset of chronic diseases, such as heart disease, type 2 diabetes, and hypertension.

Rationale:

The focus of FSNE is the healthy promotion to help FSP eligibles establish healthy eating habits and a physically active lifestyle and the primary prevention of disease 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. Per USDA WRO Plan questions (FFY 2008), these brochures are beyond the scope of FSNE.

Source: Food Stamp Nutrition Plan Guidance and FFY 2008 USDA WRO Plan Response.

**6. Promote exclusively organic produce at a Farmers' Market.**

Possible Solution:

Promote use of seasonal fruits and vegetables found at a Farmers' Market.

Rationale:

Currently we do not allow the promotion of Organic Produce over regular produce because of the USDA guidance not to convey negative messages about a commodity and to stay consistent with the Dietary Guidelines for Americans, which does not address Organic produce as being healthier than regular produce, and in most cases Organic produce is more expensive, which would not fit in with the USDA message to maximize purchasing power for healthy foods.

- 7. Develop a curriculum for use with students to educate them about portion distortion and the dangers of eating junk/fast foods. The curriculum will include pictures of a popular fast food restaurant's Dollar Menu selections to show menu items that are particularly high in calories, fat, and sodium.**

Possible Solution:

Search for existing *Network* approved curriculum that educates students about healthy portions and how they can reduce their risk of obesity and related chronic diseases by eating a healthy diet. The curriculum will include fruit and vegetable recommendations and menu planning. If a curriculum for your target audience does not exist, contact your Program Manager and discuss the need for developing a curriculum. Your Nutrition Education Consultant is also a great resource for locating existing curriculum materials that can meet your needs.

Rationale:

Any material that endorses or promotes brand name products or retail stores is unallowable. Negative written, visual, or verbal expressions about specific foods, beverages, or commodities are unallowable.

Source: Allowable/Unallowable Chart - Literature/Materials/Audiovisuals.

- 8. Develop healthy recipes to use in cooking classes.**

Possible Solution:

Use an existing recipe from a *Network* cookbook or other recommended source (e.g., Fruits & Veggies—More Matters®).

Rationale:

There are many reputable cookbooks and other resources available that provide hundreds of healthy recipes, including those developed by the *Network* and by the National Fruit and Vegetable Program (formerly 5 A Day). Contractors are encouraged to review existing healthy recipes before considering developing new recipes or cookbooks. Prior to developing new recipes or cookbooks, contractors should contact their assigned Program Manager, who will help determine whether it is necessary and feasible. If it is determined that developing new recipes or cookbooks is necessary and feasible, then the contractor is required to adhere to the guidelines provided in the *Network's* Recipe Guidelines Criteria Manual.

Source: Program Guidelines Manual- Section 406.

- 9. Teach gardening concepts (e.g., plant parts, the importance of watering and fertilization) in a school or community garden.**

Possible Solution:

Provide nutrition education classes on the health benefits of eating fruits and vegetables using the school or community gardens as your outdoor hands-on classroom. Gardening concepts (e.g., plant parts, the importance of watering and fertilization) may broadly fit into concepts of teaching nutrition and healthy eating but garden costs associated with seeds, tools, fencing, fertilizer, maintenance labor, such as weeding and watering must be funded through other partners/agencies.

OR

Provide nutrition education materials that are designed to be used by garden programs to teach nutrition education to participants.

Rationale:

Educational supplies, curricula and staff salaries to teach gardening concepts as part of nutrition education efforts that reinforce the beneficial nutrition aspects of gardening is allowable. 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 is unallowable.

Source: Allowable/Unallowable Chart – Gardening.

**10. Purchase planting soil and seeds to plant tomatoes as part of a class on the nutrition and health benefits of tomatoes.**

Possible Solution:

Teach the nutrition education portion of a class on the nutrition and health benefits of tomatoes and partner with another agency to purchase the soil and seeds to plant the tomatoes or get them donated. Note: The cost of donated garden supplies cannot be leveraged as State Share.

Rationale:

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 is unallowable.

Source: Allowable/Unallowable Chart – Gardening.

**11. Conduct a local needs assessment to determine the accessibility of fruits and vegetables in a low-income neighborhood in your community.**

Possible Solution:

As part of your Scope of Work local needs assessment, determine the accessibility of fruits and vegetables in a low-income neighborhood in your community. The assessment will be low-cost and will provide data for future SOW intervention program planning.

Rationale:

Local community food security and needs assessments are unallowable except when such an activity is of minimal or no cost and is integral to general FSNE nutrition education program planning. Assessments of consumer needs and access to healthy foods as an integral part of program planning to increase the effectiveness of FSNE interventions and strategies is allowable. The costs, however, must be minimal, reasonable and limited to the scope of the FSNE activities.

Source: Allowable/Unallowable Chart - Research, Evaluation, and Needs Assessments.

**12. Attend a national nutrition conference in San Diego using *Network*-funds that was not approved in your SOW.**

Possible Solution:

Prior to attendance at the conference, receive approval for the attending the conference from your Program and Contract Manager by providing adequate justification for attendance at the national conference (Send in Non-*Network* travel approval form) and have adequate funding available in your budget for the travel and attendance.

Rationale:

No more than four FSNE staff (including *Network*, DSS and UCD state and local agencies) are allowed to travel for national-level conference, meeting or training, even when occurring in the State. Attendance must be justified and have prior USDA approval.

Source: Allowable/Unallowable Chart - Staff Training, Conferences, and Other Costs.

**13. Conduct stress management classes in conjunction with nutrition education classes to assist participants in managing life's stressor and to promote coping skills, including healthy eating.**

Possible Solution:

Conduct nutrition education classes that involve skill building activities to assist participants with eating healthy on the go and/or on a budget. (The stress management class could be taught by partner with separate funding.)

Rationale:

Classes that are designed to provide case management or "life skills" training (e.g. parenting, child development, crisis management, rental information) are unallowable. Only the portion of the class related to nutrition education is allowable.

Source: Allowable/Unallowable Chart - Nutrition Education Events/Classes.

**14. Promote "5 a Day," eating at least 5 servings of fruits and vegetables per day, to adult nutrition class participants.**

Possible Solution:

Promote consumption of the recommended number of cups of fruits and vegetables per day, based on age, gender, and physical activity level, to adult nutrition class participants.

Rationale:

Existing materials and newly developed materials must be based on accurate scientific information related to diet and physical activity, and be consistent with information found in USDA Dietary Guidelines for Americans 2005 and MyPyramid.

Source: Program Guidelines Manual, Section 402B-402C

**15. Create a handout promoting the benefits of different colors of fruits and vegetables. For example, red fruits and vegetables may help control high blood pressure; dark orange fruits and vegetables help maintain good vision and strengthen the immune system.**

Possible Solution:

Find an existing handout promoting the benefits of eating a variety of colorful fruits and vegetables.

Rationale:

The science has moved away from the association of “color” to health benefits and now focuses on beneficial nutrients. Newly developed materials must not reference specific benefits of different colors of fruits and vegetables, but instead recommend eating a variety of colored fruits and vegetables.

Source: Program Guidelines Manual, Section 402C