



# Supplemental Nutrition Assistance Program Education Guidance



## Nutrition Education and Obesity Prevention Grant Program



United States Department of Agriculture  
Food and Nutrition Service

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# Supplemental Nutrition Assistance Program Education Guidance

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## Nutrition Education and Obesity Prevention Grant Program

### Introduction

This Fiscal Year (FY) 2013 Supplemental Nutrition Assistance Program Education (SNAP-Ed) Guidance marks a milestone in SNAP-Ed with the re-structuring of the program based on enactment of the Healthy, Hunger-Free Kids (HHFK) Act of 2010 (Public Law 111-296). The statute, signed December 13, 2010, included Section 241 and amended the Food and Nutrition Act (FNA) of 2008, Section 28 establishing a nutrition education and obesity prevention grant program. The nutrition education and obesity prevention grant program seeks to improve SNAP-Ed programmatic operations and effectiveness and ease administrative burden while continuing to meet the needs of the eligible low-income population. Emphasis on obesity prevention, in addition to nutrition education, promises to foster a more effective and comprehensive SNAP-Ed to address the critical problem of obesity, especially its effects on low-income Americans. The Food and Nutrition Service (FNS) will continue to refer to the nutrition education and obesity prevention grant program as SNAP-Ed.

FY 2011, SNAP-Ed moved away from a program of Federal reimbursement for 50 percent of State administrative expenditures to carry out SNAP-Ed activities to the establishment of a capped, grant-funded program providing 100 percent Federal funds with no required State contribution or match. States received allocations for FY 2011 based on their share or percentage of SNAP-Ed expenditures for FY 2009, as reported to FNS in February 2010. FY 2012 brought the first year of indexing the grant funds for inflation. For FY 2014 and thereafter funding will be based on State shares of SNAP-Ed expenditures in conjunction with State shares of SNAP participation starting with a 90/10 ratio in 2014 and building progressively to a 50/50 weighting of expenditures to participation in 2018 and thereafter.

The two-year transition period called for in the HHFK Act during which SNAP-Ed Plans remained consistent with requirements in effect prior to passage of the law ends at the completion of FY 2012. In FY 2013 States will implement the provisions of the FNA using the instructions contained in this Guidance and other SNAP policy. This Guidance presents a range of interventions, approaches, and other issues for SNAP-Ed that may evolve over time. FNS may seek to adjust SNAP-Ed operations based on the outcomes of these new activities.

The FY 2013 SNAP-Ed Guidance supersedes previous Guidance. It provides instructions to States to implement all provisions of the FNA, Section 28. SNAP has re-designed the SNAP-

Ed Guidance to address the programmatic changes necessary with implementation of provisions from the FNA and to make the Guidance more user-friendly. The guidance is available in pdf format on the SNAP-Ed Connection: <http://snap.nal.usda.gov>. The 2013 Guidance is organized into four sections: Overview Supplemental Nutrition Assistance Program Education/Nutrition Education and Obesity Prevention Grant Program; the SNAP-Ed Plan Process; Financial and Cost Policy; and Appendices.

# Supplemental Nutrition Assistance Program Education Guidance

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## Overview

Supplemental Nutrition Assistance Program Education  
Nutrition Education and Obesity Prevention Grant Program

While the statute changes SNAP-Education (SNAP-Ed), the mission of FNS and the goal and focus of SNAP-Ed remain the same. New SNAP-Ed requirements mandated by the FNA, Section 28 complement and address the Agency mission and the goal and focus of SNAP-Ed. The FNS mission is *to provide children and needy families better access to food and a more healthful diet through its food assistance programs and comprehensive nutrition education efforts.*

## SNAP-Ed Goal and Focus

The **SNAP-Ed goal** is *to improve the likelihood that persons eligible for SNAP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current Dietary Guidelines for Americans and U.S. Department of Agriculture (USDA) food guidance.*

The **focus** of SNAP-Ed is:

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

SNAP-Ed Plans should include behaviorally focused, evidence-based nutrition education and obesity prevention interventions, projects, or social marketing campaigns that are consistent with FNS' mission and the goal and focus of SNAP-Ed.

The Dietary Guidelines for Americans are the foundation of nutrition education in all FNS nutrition assistance programs. The FNA stipulates that SNAP-Ed activities must promote healthy food choices based on the most recent Dietary Guidelines for Americans. Therefore, messages delivered through SNAP-Ed should continue to be consistent with the Dietary Guidelines and the associated USDA Food Guidance System, MyPlate. For complete information on the Dietary Guidelines and MyPlate, please refer to the USDA Center for Nutrition Policy and Promotion's Web site at <http://www.cnpp.usda.gov/>.

## SNAP-Ed Key Behavioral Outcomes

In addition to consistency with the mission of FNS and the goal and focus of SNAP-Ed, FNS encourages States to focus their efforts on the following behavioral outcomes for SNAP-Ed participants in order to magnify the impact of SNAP-Ed:

- Make half your plate fruits and vegetables, at least half your grains whole grains, and switch to fat-free or low-fat milk and milk products;
- Increase physical activity and reduce time spent in sedentary behaviors as part of a healthy lifestyle; and,
- Maintain appropriate calorie balance during each stage of life — childhood, adolescence, adulthood, pregnancy and breastfeeding, and older age.

States may address other behavioral outcomes consistent with the Dietary Guidelines for Americans and the goal and focus of SNAP-Ed. The primary emphasis of these efforts should remain on assisting the SNAP-Ed target population to establish healthy eating habits and physically active lifestyles to promote health and prevent disease, including obesity. States must consider the financial constraints of the SNAP-target population in their efforts as required under the FNA.

## Definitions

FNS has updated the definition of nutrition education to align it with the re-designed SNAP-Ed. In updating the definition, the Agency considered a variety of factors including stakeholder comments, definitions used by other agencies, the resources available for nutrition education and obesity prevention services, and the FNS mission. The new SNAP-Ed definition for nutrition education and obesity prevention services follows.

***SNAP nutrition education and obesity prevention services** are any combination of educational strategies, accompanied by environmental supports, designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low-income individuals eligible to participate in SNAP and other means-tested Federal assistance programs. Nutrition education and obesity prevention services are delivered through multiple venues and involves activities at the individual, community, and appropriate policy levels. Acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans.<sup>1</sup>*

Another provision of the FNA requires that allowable activities in the re-designed SNAP-Ed be evidence-based. FNS again considered definitions related to evidence-based activities used by other agencies and stakeholder comments. The Agency additionally considered the types of activities that would have the greatest impact and show promise in demonstrating the effectiveness of a wide range of approaches. The following defines an evidence-based approach that now will be required in SNAP-Ed activities.

*An **evidence-based approach** for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available practice-based evidence. The best research evidence refers to relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence. Practice-based evidence refers to case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential.*

*Evidence may be related to obesity prevention target areas, intervention strategies, and/or specific interventions. The target areas are identified in the current Dietary Guidelines for Americans. Intervention strategies are broad approaches to intervening on specific target areas. Interventions are a specific set of evidence-based, behaviorally-focused activities and/or actions to promote healthy eating and active lifestyles. Evidence-based allowable use of funds for SNAP-Ed include conducting and evaluating intervention programs, and*

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<sup>1</sup> Adapted from definition by Isobel R. Contento, PhD in nutrition education, Linking Research, Theory, and Practice, Jones and Bartlett Publishers, 2011

*implementing and measuring policy, systems, and environmental changes in accordance with SNAP-Ed Guidance.*

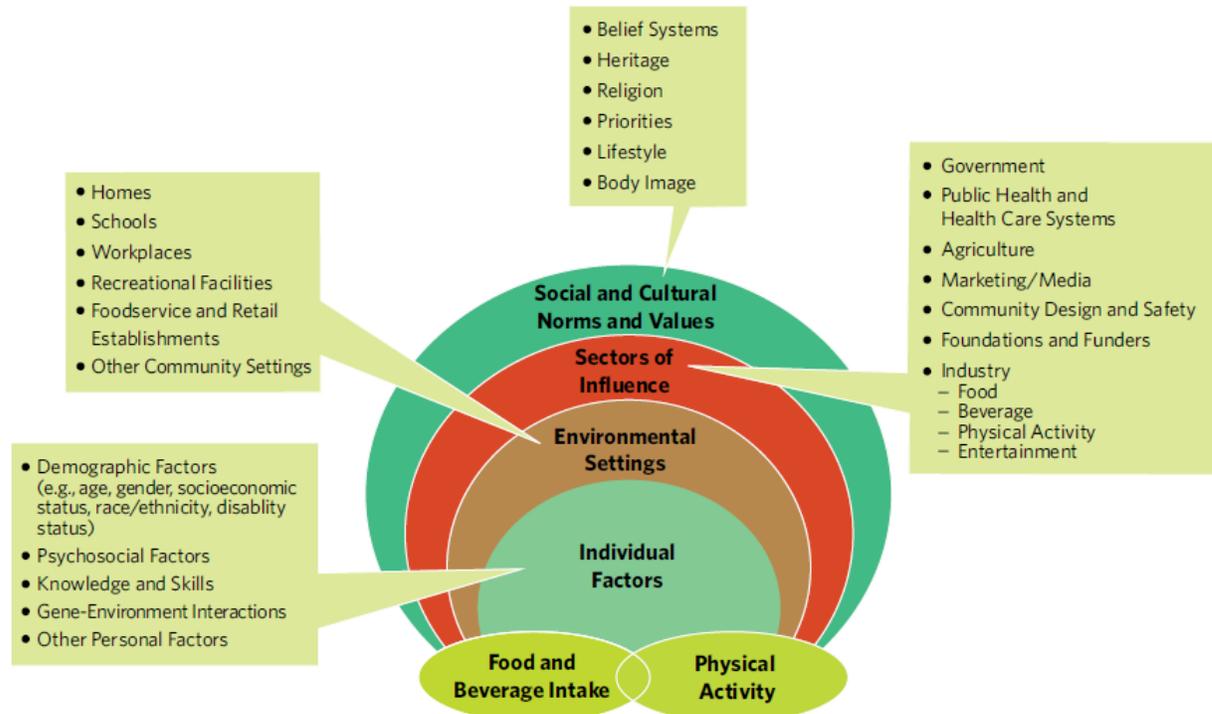
## Approaches

The FNA stipulates that SNAP-Ed funds may be used for evidence-based activities using these approaches:

1. Individual or group-based nutrition education, health promotion, and intervention strategies;
2. Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels;
3. Community and public health approaches to improve nutrition.

The 2010 Dietary Guidelines, Chapter 6, states that a coordinated system-wide approach is needed to reverse the current national environment that promotes caloric overconsumption, discourages physical activity, and includes concurrent dramatic increases in the rates of overweight and obesity and poor health outcomes. The Dietary Guidelines describe the Social-Ecological Model (SEM) which many public health experts agree illustrates how all sectors of society, including individuals and families, educators, communities and organizations, health professionals, small and large businesses, and policymakers combine to shape an individual's food and physical activity choices, and ultimately one's calorie balance and chronic disease risk. The SEM offers an opportunity to address providing SNAP nutrition education and obesity prevention services to the low-income SNAP target audience through the three approaches – individual and group-based activities, multi-level interventions, and community and public health approaches – described in the FNA. Please refer to the [Dietary Guidelines, Chapter 6](#) for detailed information on the Dietary Guidelines Socio-ecological Framework for Nutrition and Physical Activity decisions depicted below. SNAP-Ed activities may be implemented considering this model. Using a comprehensive approach in SNAP-Ed such as this framework could further SNAP-Ed's collaborative efforts and doing so would make SNAP-Ed's strategies more consistent with current public health practices for health promotion and disease prevention.

**FIGURE 6 1: A Social Ecological Framework for Nutrition and Physical Activity Decisions**



**Examples of Potential SNAP-Ed Activities  
Using Approaches Cited in the FNA**

**Individual or group-based nutrition education, health promotion, and intervention strategies**

Activities conducted at the individual and interpersonal level have always been a nutrition education delivery approach in SNAP-Ed and remain essential today. Some examples of allowable activities for States to consider using this approach include but are not limited to:

- Conducting nutrition education programming on all Dietary Guidelines messages, including promoting foods and nutrients to increase such as vegetables, fruits, and foods with more potassium and recommending limitations on foods and food components to reduce such as sodium, solid fats, and foods with added sugar like sugar-sweetened beverages;
- Conducting individual or group educational sessions on calorie balance and weight management based on the Dietary Guidelines. This could include measuring height

and weights or using self-reported heights and weight to determine body mass index (BMI);

- Integrating nutrition into ongoing physical activity group sessions;
- Implementing classes to build basic skills such as cooking classes.

### **Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels**

These approaches may address several or all sectors or levels of the socio-ecological model and may target the individual, the interpersonal (family, friends, etc.), organizational (workplace, school, etc.), community (food retailers, food deserts, etc.), and public policy or societal (local laws, social norms, etc.). In SNAP-Ed, States may implement activities at the environmental and policy level according to the definition of nutrition education and obesity prevention services in this Guidance. Examples of activities that States may wish to consider include but are not limited to:

- Developing/implementing nutrition and physical activity policies at organizations where SNAP eligible groups are predominantly located such as work-sites of low-wage earners or eligible youth- and faith-based organizations;
- Collaborating with schools and other organizations to improve the school nutrition environment including providing nutrition education classes and serving on school wellness committees;
- Coordinating with outside groups to strategize how healthier foods may be offered at sites such as emergency food sites frequented by the target audience;
- Establishing community gardens in low-income areas such as public housing sites, eligible schools, and qualifying community sites;
- Working to bring farmers' markets to low-income areas;
- Coordinating with WIC to promote and support breastfeeding activities.

### **Community and public health approaches to improve nutrition**

Community and public health approaches are efforts that affect a large segment of the population rather than targeting the individual or a small group. By focusing activities on settings with large numbers of low-income individuals, public health approaches can target the SNAP-Ed target audience.

Activities to consider where SNAP-Ed could assist include:

- Working with local government in developing policies for eliminating food deserts in low-income areas;
- Collaborating with community groups and other organizations to improve the food and nutrition environment in low-income areas;
- Providing consultation to SNAP retailers on stocking healthier food options;
- Participating in civic work groups that provide input on changing the physical environment to facilitate safe physical activity opportunities in low-income areas;

- Facilitating the reporting of statewide surveillance and survey data on nutrition indicators among the SNAP-eligible population
- Providing interventions at settings with large proportions of low-income people such as schools, worksites, community centers, places of worship, community gardens, farmers markets, food retail venues, or other settings with a majority low-income population.

States may implement one or more of the above approaches to deliver evidence-based nutrition education and obesity prevention activities in their SNAP-Ed programs. To enhance their efforts, FNS encourages State agencies to integrate multiple approaches in implementing these activities. An example of implementing activities from all three approaches in schools with a majority low-income population could include several of the following components:

*teaching children about nutrition; holding cooking classes for students; working on school wellness committees to improve school meals and the school food environment including competitive foods; creating wellness policies that address food served at parties, fundraisers and, school events; sending home information for parents and families to use; assisting with starting a school garden and starting a farm-to-school program; including nutrition education efforts in service projects such as community and church gardens; and creating a social marketing program to change norms around the food environment and healthy eating.*

With the definitions of nutrition education and obesity prevention services and an evidenced-based approach, States have opportunities to include additional programming into their SNAP-Ed activities. These activities must comply with SNAP-Ed financial and cost policy detailed in Section 3, including policy on allowable costs and reasonable and necessary expenditures. For example, while building walking trails in a low-income community would promote physical activity for the SNAP-Ed target audience it would not be an allowable cost since capital expenditures are not permitted, but also because doing so moves away from the FNS mission and the goal and focus of SNAP-Ed.

## Coordination and Collaboration Requirements

In conformance with the FNA, States may coordinate their SNAP-Ed projects with other public or privately funded health promotion or nutrition improvement strategies. With this Guidance, FNS strongly encourages States to coordinate SNAP-Ed activities with other national, State, and local nutrition education and health promotion initiatives and interventions, particularly those implemented by other FNS nutrition assistance programs and initiatives such as the WIC Program and Team Nutrition. States are now required to describe their coordination efforts in their SNAP-Ed Plans following the instructions contained in ***Section 2, the SNAP-Ed Plan Process***.

States also are strongly encouraged to coordinate activities and collaborate with community nutrition education and obesity prevention activities such as State Departments of Health and/or Education implementation of related State and federally funded programs. Such collaboration provide the capacity for SNAP-Ed to meet its goal, remain consistent with the FNS mission, while reaching low-income families and individuals through multiple spheres of the SEM. Since SNAP-Ed funds are capped, States may be able to leverage SNAP-Ed

financial resources with that of other organizations to reach eligible individuals through multiple channels and varied approaches to increase effectiveness and efficiency.

States must continue to show in their SNAP-Education Plans that the funding received from SNAP will remain under the administrative control of the State SNAP agency as they coordinate their activities with other organizations. States must describe the relationship between the State agency and other organizations with which it plans to coordinate provision of services, including statewide organizations. States should formalize these relationships through letters of support or commitment. Copies of contracts and Memoranda of Agreement must be available for inspection upon request.

## Guiding Principles

In 2007, FNS developed Guiding Principles that characterize its vision of quality nutrition education and address the nutrition concerns and food budget constraints faced by those eligible for SNAP. These Guiding Principles have been updated to reflect the definitions of nutrition education and obesity prevention services, and evidence-based activities that stem from the FNA.

States are strongly encouraged to use these Guiding Principles as the basis for SNAP-Education activities in conjunction with the SNAP-Education goal and behavioral outcomes. States may focus their efforts on other interventions based on the Dietary Guidelines that address their target audiences providing justification and rationale in their SNAP-Education Plans.

FNS encourages State agencies to conduct SNAP-Education activities from any level of the Dietary Guidelines Socio-ecological Framework for Nutrition and Physical Activity Decisions to implement their projects and suggests that at least two levels be attempted. FNS encourages States to coordinate activities with partners using strategies from multiple spheres of the framework to further mutual efforts.

### SNAP-Education Guiding Principles

The updated SNAP-Education Guiding Principles are based on prior SNAP-Education Guiding Principles that have been updated to reflect new statutory requirements and to guide implementation of an evolving SNAP-Education.

#### The SNAP-Education Program:

**1. Is intended to serve SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs.**

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

FNS is committed to providing eligible low-income individuals with the opportunity to receive SNAP-Ed. The Agency has determined that the population eligible for SNAP-Ed are SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs. This definition more closely aligns SNAP-Ed with other FNS, Federal, and State-administered benefit programs, allowing the focus to remain on the low-income population while also permitting a greater reach to persons residing in communities with a significant low-income population.

Certain settings offer a high likelihood of reaching individuals eligible for SNAP-Ed and are appropriate locations for SNAP-Ed delivery. Such venues include SNAP/TANF offices, public housing sites, food banks, and job readiness or training programs for SNAP/TANF recipients.

States may deliver SNAP-Ed to the target population through other venues if the audience meets the general low-income standard (i.e. > 50% of persons have household incomes of  $\leq$  185% of the Federal Poverty Guidelines). Examples of such venues may include schools, childcare centers, Summer Food Service Program sites, community centers, and grocery stores. For other venues than those previously described, States must prorate SNAP-Ed's share of the total cost based on the estimated number of the SNAP-Ed target audience that may receive SNAP-Ed. Details pertaining to cost accounting are described in ***Section 3, Financial and Cost Policy Section.***

FNS encourages State agencies to communicate with State SNAP outreach staff to assist in identifying low-income persons who may be eligible for SNAP-Ed. Coordinating activities with other Federal, State, and community efforts may enhance targeting efforts.

**2. Includes nutrition education and obesity prevention services consisting of any combination of educational strategies, accompanied by environmental supports, designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low-income individuals eligible to participate in SNAP and other means-tested Federal assistance programs. Nutrition education and obesity prevention services are delivered through multiple venues and involve activities at the individual, community, and appropriate policy levels. Acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans.**

This SNAP-Ed definition focuses on the needs of the low-income population eligible for SNAP and recognizes that environmental support, in addition to educational strategies, are necessary to have an impact on nutrition and physical-activity related behaviors. The definition emphasizes that policy level interventions in SNAP-Ed are based on the Dietary Guidelines for Americans and encourages delivery of nutrition education and obesity prevention activities through multiple channels at a variety of levels as described in the Dietary Guidelines Socio-ecological Framework.

Interactive group and one-on-one instruction and media campaigns are among the approaches used to deliver nutrition education to the SNAP-Ed audience. Social marketing plays an important role in the design and implementation of many SNAP-Ed activities. Social marketing may include intervention strategies at the individual, organizational /institutional, and societal levels. This approach emphasizes:

- Targeting an identified segment of the SNAP-Ed 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).

FNS recognizes the potential impact environmental factors such as institutional policy, neighborhood design, food access, and advertising may have on eating and physical activity behaviors. States may incorporate activities associated with environmental and policy changes into SNAP-Ed Plans, especially if these activities are part of collaborative efforts with other national, State, or local efforts. Environmental and policy-related activities and interventions must target the low-income SNAP-Ed population and be implemented such that the FNS mission and the goal and focus of SNAP-Ed are considered.

SNAP-Ed can help support State environmental changes, which target the SNAP-Ed target population, through examples such as these: health promotion efforts e.g. promoting use of a walking trail, selection of healthy foods from vending machines, etc.; or by serving on relevant nutrition and/or physical activity-related State and local advisory panels. Areas that, in general, fall outside the Agency’s “reasonable and necessary” criteria (see Section 3, Financial and Cost Policy) and would not be allowed include funding for infrastructure changes, like purchasing capital equipment or building sidewalks, and organized efforts to influence elected officials or lobbying for legislative/policy changes.

**3. Has the greatest potential impact on the nutrition-related behaviors of the overall SNAP low-income population when it targets women and children in SNAP-eligible households.**

To get the most out of the capped SNAP-Ed funding, FNS continues to encourage States to focus their resources on changing the nutrition and physical-related behaviors of key subsets of the SNAP population. Specifically, FNS encourages targeting first, women, and then children in households participating in SNAP.

Many view women as gatekeepers of what food is purchased. The grocery industry reports that 69% of primary shoppers are female heads of household.<sup>2</sup> A survey by the American Dietetic Association Foundation reports on the key role mothers have as models for their children’s eating habits.<sup>3</sup> Parents point out that children and teenage youth affect family grocery and meal choices.<sup>4</sup> Together, mothers and their children make or influence food purchases and meal decisions.

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<sup>2</sup>Progressive Grocer Annual Report, April 2003.

<sup>3</sup>“Children’s Role Models for Health: Parents Outrank Others.” Survey by American Dietetic Association Foundation, January 2003.

<sup>4</sup> 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.

Targeting SNAP-Ed to women and children captures a majority of SNAP recipients. In FY 2010, 19 percent of SNAP participants, or almost 8 million, were women living in households with children. An additional 47 percent of participants were children.

Targeting these two groups also is important to address obesity. According to data from the National Health and Nutrition Examination Survey, 2009–2010, more than one-third of adults (35.7%) and almost 17% of children and adolescents aged 2–19 years were obese in 2009–2010. Reaching children is particularly important because as stated in *Nutrition Insight*, “The quality of children’s and adolescents’ diets is of concern because poor eating patterns established in childhood may transfer to adulthood. Such patterns are major factors in the increasing rate of childhood obesity over the past decades and are contributing factors to related health outcomes. In addition, nutrition-related diseases that were once considered adult illnesses, such as type 2 diabetes and high blood pressure, are increasingly diagnosed in children.”<sup>5</sup>

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

FNS’ national focus on women and their children does not preclude States from also offering SNAP-Ed to other SNAP audience segments such as the elderly, men, or adults without children. A needs assessment of the SNAP-Ed target population will help States focus SNAP-Ed effectively and efficiently to yield the greatest change in nutrition and physical activity-related behavior among the targeted population.

#### **4. Uses evidence-based, behaviorally focused interventions and can maximize its national impact by concentrating on a small set of key local outcomes, environmental, and/or policy level interventions.**

Evidence-based interventions based on the best available evidence may be used. This Guiding Principle clarifies the meaning of “evidence-based” to reflect FNS’s expectation that SNAP-Ed operators focus on the following:

- 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;
- Incorporate general education features that have shown to be effective such as:
  - Behaviorally-focused messages;
  - Use of motivators and reinforcements that are personally relevant to the target audience;

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<sup>5</sup> Nutrition Insight 43, U.S. Department of Agriculture, Center for Nutrition Policy and Promotion, April 2009

- Use of multiple channels of communication to convey messages;
- Include approaches that provide for active personal engagement; and
- Include intensity/duration that provides the opportunity for multiple exposures to the message.
- Consider practice-based interventions

Where rigorous reviews and evaluations are not available, practiced- based evidence may be considered. From the FNS definition of evidence-based, practice-based evidence refers to case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential. Practice-based interventions provide emerging evidence and may include evaluations of efforts such as State and/or community-based programs that show promise. Information from these types of interventions may be used to build the body of evidence for promising SNAP-Ed interventions. States should provide justification and rationale for implementation of projects built upon practice-based evidence.

While there are many important nutrition and physical activity-related issues that influence the SNAP-Ed target audience, FNS encourages States to concentrate their SNAP-Ed efforts on the SNAP-Ed Key Behavioral Outcomes described earlier under SNAP-Ed Goals and Focus. These behaviors are associated with a reduced risk of some forms of cancer, type 2 diabetes, and coronary heart disease. The focus on the Key Behavioral Outcomes for the SNAP-Ed population is appropriate since low-income individuals often experience a disproportionate share of obesity and diet-related problems that are risk factors in the major diseases contributing to poor health, disability, and premature death. Other evidence-based activities that are consistent with the Dietary Guidelines for Americans and the USDA Food Guidance System that consider the FNS mission and the goal and focus of SNAP-Ed may be allowable.

**5. Can maximize its reach when coordination and collaboration takes place among a variety of stakeholders at the local, State, regional and national levels through publicly or privately-funded nutrition intervention, health promotion, or obesity prevention strategies.**

The likelihood of nutrition education and obesity prevention interventions 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, particularly with other FNS programs, toward a common goal to reinforce and amplify each other’s efforts. Collaborative projects necessitate commitments of staff support and time, and leverages funds among all involved entities. Please refer to the Coordination and Collaboration Requirements described earlier in this section for additional information.

To further support healthy lifestyles, State agencies are encouraged to provide wellness training for 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 SNAP-Ed per

se, but would be an allowable SNAP administrative cost similar to other training or personnel benefits.

## **6. Is enhanced when the specific roles and responsibilities of local, State, regional and national SNAP agencies and nutrition education providers are defined and put into practice.**

Providing nutrition education and obesity prevention services to the SNAP-Ed target audience 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 SNAP-Ed operations.

### **FNS, USDA:**

Establishes SNAP-Ed policy and develops related guidelines and procedures, intervention programs, and activities that address the highest priority nutrition problems and needs of the target audiences.

Allocates to State SNAP agencies 100% funding for allowable, reasonable, and necessary SNAP-Ed costs.

Reviews and approves State SNAP-Ed Plans.

Monitors State SNAP-Ed projects.

Leads the coordination of nutrition education and obesity prevention 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 SNAP-Ed messages with all other FNS nutrition assistance program messages.

Provides technical assistance to program providers at all levels including linking staff with appropriate resources.

Develops and provides nutrition education materials for use with the SNAP target audience.

Oversees the collection and analysis of national SNAP-Ed data.

Incorporates the Dietary Guidelines for Americans and the USDA Food Guidance System into FNS nutrition assistance programs.

Promotes evidence-based decisions through technical assistance, standards for research, and support for sound and systematic evaluation.

### **State SNAP 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 the SNAP-Ed target population.

Develops a coordinated, cohesive State SNAP-Ed Plan that addresses national and State priorities and links SNAP-Ed to SNAP benefits.

Provides leadership, direction, and information to entities contracted to provide SNAP-Ed services to ensure that SNAP-Ed appropriately serves the SNAP-Ed audience and is consistent with SNAP-Ed policies.

Submits a unified State SNAP-Ed plan to FNS and provides assurances that Plan activities comply with SNAP-Ed policies.

Submits a final SNAP-Ed performance report to FNS each year.

Monitors implementation of the State's approved SNAP-Ed Plan including allowable expenditures.

Offers training to State/local office human services staff on the availability of SNAP and SNAP-Ed services.

Provides budget information to FNS as required.

Collects and reports data regarding participation in SNAP-Ed and characteristics of those served.

Considers offering wellness training to State/local office human services professionals.

### **State SNAP-Ed Provider:**

Works with State SNAP agency, other FNS Programs, and other SNAP-Ed providers within the State to develop a single comprehensive State SNAP-Ed Plan that addresses

national/State priorities, needs of the SNAP-Ed audience, and includes sound evaluation strategies.

Works with other State and local agencies and with private agencies to promote healthy eating and active living among the SNAP-Ed population.

Implements evidence-based nutrition education and obesity prevention efforts as specified in the approved State SNAP-Ed plan.

Submits required reports according to timelines established by the State SNAP agency.

### **Local SNAP office:**

Informs SNAP participants and applicants of opportunities to participate in SNAP services, including SNAP-Ed.

Builds relationships with other local service providers (WIC, local health departments, and school meals programs) so referrals of SNAP participants to other nutrition and health related services can be made as appropriate.

### **Local SNAP-Ed Provider**

Delivers nutrition education and obesity prevention services to the SNAP audience according to approved SNAP-Ed plan.

Helps the SNAP-Ed audience understand how to eat a healthy diet on a limited food budget using SNAP benefits and managing their food resources.

Uses appropriate educational strategies and implementation methods to reach the SNAP-Ed population.

Works with the State SNAP agency to provide information to State/local office human services staff on the availability of SNAP-Ed services.

Collects and reports data regarding participation in SNAP-Ed and characteristics of those served.

As space and resources allow, makes SNAP-Ed information and services available in the SNAP office.

Coordinates opportunities between SNAP outreach and SNAP-Ed efforts, as appropriate and available.

Participates in worksite wellness activities or community-based wellness programs, as appropriate and available.

Collects and reports data regarding participation in SNAP-Ed and characteristics of those served.

Builds relationships with other local service providers (WIC, local health departments, and school meals programs) so referrals of SNAP participants to other nutrition and health related services can be made as appropriate.

Provides referrals to the SNAP for low-income non-participants to access SNAP benefits, as appropriate.



# Supplemental Nutrition Assistance Program Education Guidance

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## SNAP-Ed Plan Process



This section describes the requirements for SNAP-Education Plans based on the provisions of the Food and Nutrition Act, Section 28. It also includes guidance on the development and submission of SNAP-Education Plans and Annual Reports.

### State Agency Liability:

**For SNAP:** Under SNAP regulations, the State agency submits to FNS for approval a Budget Projection Statement (BPS) (Form 366-A OMB No. 0584-0083) which provides projections of the total costs for major areas of program operations. The BPS is submitted annually by August 15<sup>th</sup>, for the upcoming FY and is updated as necessary. With the BPS, the State agency also submits a narrative justification documenting and explaining the assumptions used to arrive at the projections. State agencies must submit a plan for activities requiring prior approval, which includes the SNAP-Education Plan. FNS has 30 days to approve, deny, or request additional information. If additional information is requested, the State agency must provide this expeditiously for FNS' approval within 30 days after receiving the information. FNS notifies the State agency of the Plan approval or denial and the authorized allocation amount after which funds are put in the Letter of Credit for the State agency to draw down to pay the Federal administrative costs.

**For SNAP-Education:** The State SNAP agency is accountable for the contents and implementation of its approved SNAP-Education Plan. It is responsible for making allowable cost determinations and monitoring to ensure that SNAP-Education operators spend funds appropriately. The State SNAP agency is fully liable for repayment of Federal funds should those costs be determined unallowable. FNS Regional Office financial management and program staff are available to provide technical and other assistance to State agencies in developing Plans. The State SNAP agency is responsible for providing technical assistance to any sub-grantees to ensure that all projects support the State's SNAP-Education goals and objectives and to clarify which expenses are eligible for reimbursement through SNAP.

### SNAP-Education Plan Requirements

A State Agency must submit a SNAP-Education Plan to FNS for approval in order to request grant funds to conduct SNAP-Education activities. SNAP-Education Plans must:

- Conform to standards established in regulation, SNAP-Education Plan Guidance, and other FNS policy. A State agency may propose to implement an annual or multiyear Plan of up to three years;
- Identify the methods the State will use to notify applicants, participants, and eligible individuals to the maximum extent possible, about the availability of SNAP-Education activities in local communities;
- Describe the SNAP-Education nutrition education and obesity prevention services it will provide and how the State will deliver those services, either directly or through agreements with other State or local agencies or community organizations;
- Ensure interventions are appropriate for the eligible low-income population defined as SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs;

- Ensure proposed interventions recognize the population’s constrained resources and potential eligibility for Federal food assistance;
- Describe methods the State agency will use to identify its target audience. States may propose State-specific targeting strategies and supporting data sources;
- Include activities that promote healthy food choices based on the most recent Dietary Guidelines for Americans;
- Include evidence-based activities using one or more of the approaches described in SNAP-Ed Plan Guidance;
- Include a description of the State’s efforts to coordinate activities with national, State, and local nutrition education and health promotion initiatives and interventions, whether public or privately funded and describe the relationship between the State agency and coordinating organization;
- Include an operating budget for the Federal fiscal year with an estimate of the cost of operation for one or more years;
- Provide additional information as may be required about the nutrition education and obesity prevention activities offered and the characteristics of the target population served, depending on the contents of the State’s SNAP-Ed Plan, to determine whether nutrition education goals are being met;
- Submit a SNAP-Ed Annual Report to FNS by November 30<sup>th</sup> of each year. The report must describe SNAP-Ed Plan project activities and budget for the prior year.

## SNAP-Ed Plan Submission and Approval Process

The State agency should follow these procedures in submitting its Plan:

- Submit one single SNAP-Ed Plan and annual report per State which will incorporate all State sub-grantees that participate. The Plan should include one unified section describing the identified needs of the SNAP-Ed population in the State and the SNAP-Ed goals and objectives for the State;
- 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;
- Provide clear and concise descriptions and justifications for requested items;
- Use the recommended templates provided in this Guidance;
- Combine all sections and templates of the SNAP-Ed Plan into one comprehensive document with continuous page numbers as opposed to separate files for each section.
- Complete a careful review of the Plan by the State agency program staff and fiscal officer to assure that the Plan is consistent with the current Guidance.
- Limit the length of the Plan to not more than 150 pages and the annual report to 25 pages, excluding appendices. Use at least a twelve-point font, one-inch margins and number pages consecutively.
- Verify that the State SNAP-Ed Nutrition Coordinator or State SNAP Director and a State SNAP Agency fiscal reviewer have approved, signed, and dated the plan.
- Submit the Plan to the respective FNS Regional Office by the August 15<sup>th</sup> due date.

- Submit the previous year’s annual report to the FNS Regional Office by the November 30<sup>th</sup> due date.
- Complete the Education and Administration Reporting Form (EARS ) Form, OMB No. 0584-0542, by December 31.
- Submit Plan Amendments for current year with new/significantly revised activities to the FNS Regional Office by May 1<sup>st</sup>

The Plan should be submitted as an electronic document either as a Microsoft Word 2007 document or Portable Document Format (PDF) file saved on a compact disc. States must include changes to their State Plans as requested by FNS and resubmit the electronic copies to FNS before final approval is granted.

## Guidelines for Developing the SNAP-Ed Plan

**SNAP-Ed Plans should be consistent with the mission of FNS, the Focus of SNAP-Ed, the SNAP-Ed Key Behavioral Outcomes, and the Coordination and Collaboration policy detailed in the Overview Section of this Guidance.**

States may submit an annual or multiyear Plan. Multi-year Plans may cover a two- or three-year period. The Plan must demonstrate the flow of program activities in a logical and sequential manner with each year building upon the preceding year.

**FNS recommends the use of optional templates in the Appendices for use in preparing SNAP-Ed Plans and reports.**

### Section A. Identifying and Understanding the Target Audience

#### Definition of Target Audience

The SNAP-Ed Guiding Principles identify the target audience for SNAP-Ed as SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs. States should deliver SNAP-Ed in a way that maximizes the numbers of the SNAP target audience reached and the potential for behavior change among them.

Individuals readily identifiable as members of the target audience include: persons referred by the local SNAP office; persons reached through direct marketing to SNAP participants; persons participating in the Food Distribution Program on Indian Reservations; parents ineligible for SNAP who receive SNAP benefits on behalf of their children; and SNAP participants in a SNAP Job Readiness Training Program.

SNAP-Ed providers may use the following measures in order to identify additional persons appropriate for the target audience:

1. Income-based - Persons eligible for other means-tested Federal assistance programs such as Supplemental Security Income (SSI), the WIC Program, or Temporary Assistance for Needy Families (TANF). Persons typically not eligible for SNAP such as incarcerated persons, boarders, or college/university students are ineligible for SNAP-Ed.

2. Location-based - Persons at food banks, food pantries, soup kitchens, public housing, and SNAP/TANF job readiness program sites, etc. would qualify.
3. 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. This would include persons residing or schools located in census tract areas or other defined areas where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold or children in schools where at least 50% of children receive free and reduced priced meals.
4. Persons shopping in grocery stores when the store has been documented to redeem average monthly SNAP benefits of \$50,000 or more or 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.

### **Describing the Target Audience**

Section A of the SNAP-Ed Plan should describe the State target audience and include an assessment of its needs to better focus nutrition education and obesity prevention activities. The results should capture information on the relevant characteristics of the target audience and the extent to which nutrition education and obesity prevention 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 the Plan are outlined below and in Appendix A, Template 2.

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

- **First Review Existing Information.** Organizational partners should be considered as a source of relevant data. Pertinent findings from organizational partner information reviews should be included in SNAP-Ed 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 and the steps proposed 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:

<http://www.fns.usda.gov/ora/menu/published/NutritionEducation/Files/NeedsAssessment-Man.pdf>

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

1. Description of the State target audience. Examples of population characteristics and demographic data that may help plan and deliver SNAP-Education effectively include: geographic location, i.e., areas and neighborhoods where the SNAP-Education target population reside, SNAP participation rates, income-relevant census tract information, location of public housing, etc., race/ethnicity, age, gender, family composition, education, and primary language. The Bureau of Census' American Community Survey (ACS) collected the same information as collected in previous years by the Bureau <http://www.census.gov/acs>. The ACS data file for 2005-2009 identifies census tracts and States may use it for targeting low-income audiences. States may propose targeting methodologies and alternate data sources to identify their target audience.

A needs assessment will help target SNAP-Education effectively. FNS recommends that States maximize the SNAP-Education investment by targeting first women in households with children, and then children themselves since these two groups comprise the majority of persons receiving SNAP benefits. SNAP Household Characteristics Reports, based on SNAP Quality Control data, are available at:

<http://www.fns.usda.gov/ora/MENU/Published/SNAP/SNAPPartHH.htm>

2. Nutrition/physical activity-related behavioral and lifestyle characteristics of the State target audience. Examples of characteristics that may enhance the ability to develop, target, and deliver nutrition education and obesity prevention services include dietary and food purchasing attitudes and habits and where and how the SNAP-Education population eats, obtains physical activity, redeems SNAP benefits, lives, learns, works, and plays. Cite sources of data provided.
3. Availability of other nutrition/physical-related programs, services, and social marketing campaigns that target low-income populations in the State. Examples include WIC, Team Nutrition, EFNEP, food banks, public health services. This information will help to identify potential partners for collaboration and avoid duplication of existing services.
4. Areas of the State where the target audience is underserved or has not had access to SNAP-Education previously. Identify where the neediest target audiences are and describe the nutrition education and obesity prevention 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 SNAP-Education Plan?

**Section B: Goals, Objectives, Projects, Campaigns, Evaluation and Coordination Appendix A Template 2**

Based on the needs assessment and the current availability of other nutrition education and obesity prevention services, identify the State's goals and objectives for SNAP-Ed and the methods it will use to achieve them.

1. Identify State SNAP-Ed goals and accompanying measurable objectives. Goals should illustrate the overall purpose of SNAP-Ed activities. A well-written and clearly defined objective is:
  - Specific - Identifies a specific event or action that will take place.
  - Measurable - Quantifies the amount of change to be achieved.
  - Appropriate - Logical and relates to the State's SNAP-Ed goals.
  - Realistic - Practical, given available resources and proposed SNAP-Ed activities.
  - Time specific - Specifies a time by which the objective will be achieved within the fiscal year(s) of the Plan.

Example of a State-level objective: *By the end of the fiscal year, the State agency will have established collaborative relationships with four food banks to establish innovative obesity prevention programs for the SNAP-Ed target population at their facilities.*

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 the needs assessment support the chosen objectives should be provided.

2. Describe the nutrition education and obesity prevention projects/interventions planned to implement in support of 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 SNAP-Ed goals.

Example of a project-level objective: *By the end of the school year, students will be able to describe five benefits of growing and consuming fruits or vegetables based on their experiences in creating and sustaining a school garden.*

- b. The target audience that will receive the project/intervention, specifying all relevant characteristics and results of your needs assessment. Section A.
- c. A brief explanation of how project delivery will focus nutrition education and obesity prevention services on the SNAP-Ed population.
- d. Description of project implementation features, giving particular attention to: key educational messages, how and where services will be delivered, duration of project, the projected total number of individuals participating or reached, etc.
- e. A brief summary of existing research that is relevant to the proposed approaches and target audience. Indicate the extent to which prior studies demonstrate the feasibility and effectiveness of the proposed intervention 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 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. FNS

recommends that States use FNS or Center for Nutrition Policy and Promotion (CNPP) developed materials where possible. Some of these materials may contain information based on MyPyramid rather than the new MyPlate food guidance system icon. Portions or all of MyPyramid materials may still be useful or may be adapted to meet State needs.

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

- Research focuses on the proposed 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 SNAP-Education projects so that other States with SNAP-Education initiatives may benefit.

The following types of evaluation are appropriate and may be included in State Plans. The definitions for the different evaluation types can be found at:

[www.fns.usda.gov/ora/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf](http://www.fns.usda.gov/ora/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf)

- Formative - 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 - can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering services and/or barriers to implementing the intervention;
- Outcome - demonstrates changes that occur in the presence of an intervention but do not establish cause and effect conclusions; and
- Impact - indicates how effective the intervention was in changing the target populations' attitudes, awareness and/or behavior.

Whenever a State carries out a SNAP-Education 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/ora/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf](http://www.fns.usda.gov/ora/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf)

The Agency requests descriptions of all proposed evaluation activities. For each evaluation, please indicate:

- Project or projects with which it is associated;
- Type of evaluation as primarily a formative, process, outcome or impact assessment;
- Question(s) to be addressed by the evaluation;

- 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.

For information about program evaluation, FNS recommends the following tools:

- Nutrition Education: Principles of Sound Impact Evaluation

[www.fns.usda.gov/ora/menu/Published/NutritionEducation/Files/EvaluationPrinciples.pdf](http://www.fns.usda.gov/ora/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/ora/menu/published/nutritioneducation/Files/evalman-2.PDF](http://www.fns.usda.gov/ora/menu/published/nutritioneducation/Files/evalman-2.PDF)

- WIC Evaluation Resource Guide

[www.fns.usda.gov/ora/MENU/Published/WIC/FILES/WICEvaluationResourceGuide.pdf](http://www.fns.usda.gov/ora/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.

For SNAP-Ed projects delivered in coordination with another agency, the State should submit with their Plan, a copy of a letter of support or commitment or, written agreement e.g., a Memorandum of Understanding (MOU) that 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. States may submit written agreements in electronic format. In addition, the 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 SNAP 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 Appendix A, Template 3**

Please note that all staff paid with SNAP-Ed funds should support the delivery of SNAP-Ed to the target audience. For each project, provide the following information for all paid staff that carry out SNAP-Ed functions.

1. Position title (e.g., Nutrition Educator, Project Coordinator, etc.).
2. For each position title, attach a statement of work or position description outlining the duties associated with the SNAP-Ed project. This should clearly show how the position supports the delivery of planned SNAP-Ed activities.
3. For each position title, provide the Full Time Equivalents (FTEs) that will be funded through SNAP-Ed. FTEs are defined in Appendix C: Definitions. States may use their own definition of FTEs for purposes of reporting SNAP-Ed 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 SNAP-Ed time the position will spend performing management/administrative duties (including training and professional development) and the percentage of SNAP-Ed time that the position will spend on direct delivery of SNAP-Ed. 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 SNAP-Ed salary, benefits and wages. An estimate may be used for the budget, but actual time spent must be used for billings.

#### **Section D: Budget Summary Appendix A, Template 4**

##### Contracts, Grants or Agreements for Nutrition Education Services

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

- Name of Sub-Grantee
- Total Funding for Contract, Grant, or Agreement
- Federal Funding Requested
- Description of Services and/or Products
- Cost of Services and/or Products

##### 1. Project Costs

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

##### 2. Travel

Travel requests should be identified for in-State and out-of-State purposes. States must justify the purpose of the travel and describe how the travel request supports the State's SNAP-Ed goals and objectives. Refer to Appendix C, for more information on travel. Provide the following information in the SNAP-Ed budget:

In-State Travel

- Travel Purpose - how attendance will benefit SNAP-Education program goals and objectives, justification, destination (city, town, or county or indicate local travel), number of staff traveling, cost

- Total In-State Travel Cost

#### Out-of-State Travel

- Travel Purpose and/or Name of Conference - how attendance will benefit SNAP-Education program goals and objectives, destination (city and State), number of Staff traveling, cost

- Total Out-of-State Travel Cost

### Section E: Assurances Appendix A, Template 5

To assure compliance with policies described in this Guidance, the SNAP-Education Plan should include the following assurances, that:

1. The State SNAP agency is accountable for the content of the State SNAP-Education Plan and provides oversight of any sub-grantees. The State SNAP agency is fiscally responsible for activities funded with SNAP funds and is liable for repayment of unallowable costs.
2. Efforts have been made to target SNAP-Education to the SNAP-Education target audience.
3. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the SNAP-Education grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional SNAP-Education targeted individuals. In no case may activities funded under the EFNEP grant be included in the budget for SNAP-Education.
4. Contracts are procured through competitive bid procedures governed by State procurement regulations.
5. 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 SNAP agency (the cognizant agency) is responsible for ensuring the compliance of all funded providers.
6. 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 the Federal budget.
7. Program activities are reasonable and necessary to accomplish SNAP-Education objectives and goals.
8. All materials developed or printed with SNAP-Education funds include the appropriate USDA non-discrimination statement, credit SNAP as a funding source, and a brief message about how SNAP can help provide a healthy diet and how to apply for benefits.

### Section F: Signatures Appendix A, Template 6

The SNAP-Education Plan should be reviewed and signed by both the State SNAP agency Nutrition Coordinator or the State SNAP Director and a State SNAP agency fiscal reviewer prior to submission.

## Timeline for SNAP-Ed Plan Process

April 1-August 15	States may submit Plans for the coming FY
May 1	Last date for submission of Plan Amendments for current year with New/Significantly Revised Activities to FNS Regional Office
August 15	Annual plans or updates to multiyear plans for the coming fiscal year are due to FNS Regional Office
October 1	States May Receive Plan Approval /Response from Regional Office
November 30	Annual Report for Previous FY Due to FNS Regional Office
December 31	Submission of EARS data through FPRS online system

### Plan Amendments

State agencies must submit amendments to their approved Plans to FNS for prior approval whenever there are changes in the scope of activities. If amendments for the current year include requests for payment for new or substantially revised SNAP-Ed activities, States must submit them to FNS, with supporting documentation, no later than May 1<sup>st</sup> of the current fiscal year. Amendment should be submitted to the FNS Regional Office as an electronic document, either as a Microsoft Word 2007 document or PDF file, saved on a CD.

### Annual Report

The SNAP-Ed Annual Report that examines project activities and budget for the prior year must be submitted by November 30<sup>th</sup> of each year. By written request to the FNS Regional Office, States may request to extend the deadline for the Plan Annual Report.

#### Annual Report of Nutrition Education Activities:

Summarize the nutrition education projects implemented in the previous fiscal year. Based on evaluation results, include discussion on the outcomes and effectiveness of the SNAP-Ed program and how it might be improved in the upcoming fiscal year.

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 reports. Section A will assist State agencies in summarizing information about approved SNAP-Ed activities implemented in the previous fiscal year. Section B assists State agencies in summarizing significant evaluation activities (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. SNAP-Ed Narrative Annual Report

The purpose of section A is to describe the State's nutrition education and obesity prevention activities during the previous fiscal year. It describes the process of summarizing and highlighting a State's projects and social marketing campaigns being reported on the EARS form. The SNAP-Ed Narrative Annual Report allows a State to highlight areas of practice and discuss areas needing improvement. States may also comment on the EARS objective data.

1. **SNAP-Ed Program Overview:** Provide a one page (not more than 500 words) executive summary of SNAP-Ed activities during the reporting fiscal year.
2. **SNAP-Ed Administrative Expenditures:** Provide the percentage and total value of the total administrative expenditures as reported on question 10 of the EARS form.
3. **SNAP-Ed Evaluation Reports Completed for this Reporting Year:** Identify the type(s) of SNAP-Ed evaluations by project that resulted in a written evaluation report of methods, findings, and conclusions.
4. **SNAP-Ed Planned Improvements:** Describe any modifications the State plans to make in the next fiscal year to improve the effectiveness of specific SNAP-Ed projects and/or to address problems experienced during the past year.
5. **Appendixes:** Attach evaluation reports included under item # 3 above. States may also provide a brief description or information that highlights other SNAP-Ed projects that are not reported under the sections above.

## Section B: Annual Report Summary for Evaluations

Section B provides guidance on key information to include in the summary of evaluation results. Include the following information by project or social marketing campaign to ensure that the 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, list them all by project or campaign name.
2. **Key evaluation impact(s).** Identify each impact being assessed by the evaluation. For example, are SNAP-Ed participants more likely than non-participants to report they intend to increase their fruit and vegetable intake? Do a greater proportion of SNAP-Ed 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 intervention being evaluated

i.e., referred to as the treatment or intervention group, to those who do not receive any intervention i.e., the control group and/or to those who receive another kind of intervention 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 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.

## Education and Administrative Reporting System (EARS)

EARS collects annual uniform data and information on SNAP-Education activities. Data elements collected include demographic characteristics of participants receiving SNAP-Education benefits, topics covered by the educational intervention, education delivery sites, education strategies, and resource allocation.

**The EARS Online Training Module** is available on the SNAP-Education Connection and can be used as a refresher tool for existing staff, training for new staff, or as a reference tool.

Both the State Agency and its SNAP-Education implementing agencies play critical roles with EARS.

### State SNAP Agency is responsible for:

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

### SNAP-Education Implementing Agencies are responsible for:

- Collecting, compiling, and submitting accurate EARS data to the State Agency;
- Providing training and technical assistance to local SNAP-Education providers regarding the collection of EARS data;
- Attending any State or Regional trainings on EARS;
- 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.

### Comments on EARS

States may provide feedback on implementation of EARS for the reporting year. Include the following as applicable:

- Comments regarding challenges encountered in gathering and reporting EARS data and actions taken to resolve or address these challenges. Identify the section and item number when making comments. *EXAMPLE: Question 10. It was challenging to get this information. We addressed this by providing all partners with spreadsheets and training to help them track these costs.*

- Need for FNS to provide additional EARS training or resources? If yes, specify training topics and/or type of resources needed.
- Changes the State agency made to its IT system or manual data collection procedures for EARS in the prior fiscal year? If available, attach a description of updated IT systems and/or manual data collection procedures.
- Plans to make any changes in your IT system or manual data collection procedures for EARS in the next fiscal year? If yes, provide a short summary of changes planned.
- Will all Implementing Agencies report actual unduplicated data for EARS in the upcoming fiscal year? If not, why?
- Share suggestions for modifications to the EARS form, if any. Indicate how the modification would improve EARS, i.e. the reporting process for the State, data quality, etc. Identify the section and item number when making suggestions please. Example: Direct Ed Section, Question 3. *Race and Ethnicity - Consider adding a narrative field to allow IAs to make notations about the data or the collection procedures.*
- Other comments.

## Reviewing State SNAP-Ed Plans

This checklist is used to review SNAP-Ed Plans and may be helpful to consider during the planning process.

Elements considered when reviewing SNAP-Ed Plans		Yes	No
<b>General</b>			
	Was the plan submitted by 8/15		
	Is the plan complete?		
	Is the plan signed by appropriate State representative?		
	Does the plan use appropriate templates?		
	Are copies of Interagency Agreements included?		
	Overall, does the plan seem reasonable and will it accomplish the SNAP mission?		
<b>Needs Assessment</b>			
	Are methods and sources used appropriate?		
	Does it adequately define the audience and their needs?		
	Does it identify other nutrition and obesity prevention programs serving low-income persons?		
	Does it identify areas that are underserved?		
<b>Goals and Objectives</b>			
	Are the State goals and objectives consistent with SNAP-Ed Guidance?		
	Are objectives written in the SMART format?		
	Are the key messages included?		
	Do project objectives relate to the State goals and objectives?		
	Does the project target SNAP recipients?		

Is the project adequately described?		
Is the project supported by research?		
Is the project consistent with Dietary Guidelines and MyPlate?		
Are educational materials to be used defined and appropriate?		
Is there justification for development of new materials (if any)?		
Is there a plan to capture behavior change (performance indicators)?		
Does the Plan incorporate the public health approaches?		
Does the plan demonstrate a coordinated approach using the SEM?		
<b>Evaluation</b>		
Is the evaluation type defined?		
Is the methodology adequately defined?		
Are plans for using the results defined?		
<b>Coordination Efforts</b>		
Are coordination efforts designed so duplication of efforts is eliminated?		
Is SNAP-Ed's role in State SNAP defined?		
<b>Staffing</b>		
Are administrative FTEs and program delivery FTEs appropriate for described activities?		
Do salaries relate appropriately to the work being performed?		
Is the math in the template correct?		
<b>Budget</b>		
Is there a budget justification for all implementing agencies?		
Are costs reasonable and necessary?		

Does the salary line item match the salary total on the staffing template?		
Are indirect costs limited to 26 percent for Federal reimbursement?		
Is an indirect cost rate agreement included?		
Is the math correct?		
<b>Assurances</b>		
Are assurances included?		
Are assurances signed?		
<b>EARS</b> template completed and included?		

## Management Evaluations

### Management Evaluation (ME) Review of State SNAP-Ed Projects Performance Reporting System, Management Evaluation OMB No. 0584-0010

Although not a direct part of the SNAP-Ed Plan, the information about MEs can assist in the development of SNAP-Ed Plans.

Selection of SNAP-Ed 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;
- Quality of sample documentation used by the State agency to support payment from the State agency to subcontractors;
- Known or suspected difficulties in program administration or operation; and
- Length of time since the State's SNAP-Ed 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' program operations;
- Operations are consistent with the terms of the approved Plan;
- Activities are targeted to participating and potentially eligible SNAP clients;
- Projects are being evaluated for effectiveness;
- 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 SNAP-Ed Connection Web site.

ME Report Format:

A specific template or format is not required when organizing the ME report. The following elements are suggested for inclusion when compiling the report:

- Cover page and table of contents
- Executive Summary of overall evaluation result (one page)
- Background information - the purpose of the ME, 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 SNAP-Ed projects within the State;
  - Operational consistency with approved SNAP-Ed Plan;
  - Targeting mechanisms for eligible SNAP-Ed populations;
  - Evaluation and effectiveness of SNAP-Ed project;
  - Financial management:
    - Time and Effort records;
    - Administrative expenses documented and allowable;

- Program income accurately reported.
  - Curriculums and project materials are consistent with the Dietary Guidelines for Americans and MyPlate and include appropriate statements such as funding source and the USDA non-discrimination statement.
- Review results for each Review area:
  - Scope
  - Methodology
  - Observations
  - Findings
  - Recommendations.
- Summary



# Supplemental Nutrition Assistance Program Education Guidance

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## Financial and Cost Policy



The Financial and Cost Policy Section describes policy changes as required by the Section 28 of the Food and Nutrition Act (FNA) of 2008. It also describes the impact of these policy changes on various funding-related SNAP-Ed activities.

## State Agency Requirements

A State Agency must submit a SNAP-Ed Plan should it decide to request grant funds to conduct SNAP-Ed activities. If a State agency does not submit an adequate Plan, FNS may reallocate the State's grant among other States with approved Plans. The SNAP-Ed Plan must include an operating budget for the Federal fiscal year with an estimate of the cost of operation for one or more years. The State agency must identify the uses of funding for local projects and show that the funding will remain under its administrative control when coordinating activities with other organizations.

## Federal Financial Participation and Allocation of Grants

### How will FNS determine my State's initial allocation of SNAP-Ed funds?

Each State agency that submitted an approved fiscal year 2009 SNAP-Ed Plan will receive a 100 percent Federal grant each fiscal year to operate SNAP-Ed upon submission of an approved SNAP-Ed Plan. FNS will allocate grant funds to States based on their shares of national SNAP-Ed expenditures for fiscal year 2009, as reported in February 2010. The grants have the following characteristics:

- Require no State contribution or match;
- Are available for obligation over a two-year period;
- Are the only source of Federal funds available for SNAP-Ed activities;
- Will not cover costs incurred in excess of the grant amount.

FNS will allocate grants by:

- Determining annually each State's share of the \$375,000,000 allocated for SNAP-Ed for fiscal year 2011;
- Adjusting grant allocations for inflation from fiscal year 2012 and annually thereafter based on any increases for the 12-month period ending the preceding June 30th in the Consumer Price Index for All Urban Consumers published by the Bureau of Labor Statistics of the Department of Labor;
- Allocating the available funding each fiscal year using a formula that factors in State shares or percentages of the base 2009 Federal SNAP-Ed expenditures, building progressively to a 50/50 weighting of expenditures to national SNAP participation from fiscal year 2014 to fiscal year 2018 and beyond.

State allocations for SNAP-Ed grants will be determined for FY 2013 and beyond as follows:

(1) For fiscal year 2013, in direct proportion to the State percentage's of national SNAP-Ed expenditures for FY 2009, as reported in February 2010;

(2) For fiscal year 2014, 90 percent based on the State's percentage of national SNAP-Ed expenditures, plus 10 percent based on the State's percentage of national SNAP participation for the 12-month period February 1, 2012 to January 31, 2013;

(3) For fiscal year 2015, 80 percent based on the State's percentage of national SNAP-Ed expenditures, plus 20 percent based on the State's percentage of national SNAP participation for the 12-month period February 1, 2013 to January 31, 2014;

(4) For fiscal year 2016, 70 percent based on the State's percentage of national SNAP-Ed expenditures, plus 30 percent based on the State's percentage of national SNAP participation for the 12-month period February 1, 2014 to January 31, 2015;

(5) For fiscal year 2017, 60 percent based on the State's percentage of national SNAP-Ed expenditures, plus 40 percent based on the State's percentage of national SNAP participation for the 12-month period February 1, 2015 to January 31, 2016; and,

(6) For fiscal year 2018 and thereafter, 50 percent based on the State's percentage of national SNAP-Ed expenditures, plus 50 percent based on the State's percentage of national SNAP participation for the previous 12-month period ending January 31<sup>st</sup>.

### **What happens if my State must surrender unspent funds for reallocation?**

Should a participating State agency notify FNS that it will not obligate or expend all of the funds allocated for a fiscal year, FNS may recover the unobligated, unexpended funds and reallocate them to other participating State agencies that have approved SNAP-Ed Plans during that fiscal year or the next fiscal year. The reallocated funds received by a State will be considered part of its base 2009 allocation for the next fiscal year for the purpose of determining allocation; funds surrendered by a State will not be considered part of its base 2009 allocation for the next fiscal year for the purpose of determining allocation.

### **Fiscal Recordkeeping and Reporting Requirements**

Each participating State agency must meet FNS fiscal recordkeeping and reporting requirements. States must report total SNAP-Ed expenditures on the Federal Financial Report, SF-425. FNS expects States to continue to collect and report private and State financial contributions to their SNAP-Ed budget through the Education and Administrative Reporting System form, FNS-759.

### **Allowable Costs**

#### **How can my State agency determine if costs are allowable?**

Allowable costs are those for which FNS will reimburse the State agency that incurred them. To be allowable, a cost must:

1. Support an activity within the scope of SNAP-Ed, included in an approved SNAP-Ed State Plan;
2. Conform to Federal government-wide and SNAP-specific cost principles; and
3. Conform to government-wide and SNAP-specific rules for specific items of cost.

#### **What activities are deemed SNAP-Ed, hence chargeable to my State's SNAP-Ed allocation?**

The most fundamental Federal cost principle is that a cost must benefit a Federal program or program component in order to be reimbursable from Federal funds. A cost that supports an activity that is outside the scope of SNAP-Ed is unallowable, even if it otherwise conforms to the Federal cost principles. To be allowable, all costs charged to SNAP-Ed must be valid obligations of the State, local government or other sub-grantee, and must support activities set out in an approved SNAP-Ed Plan. The diversity of SNAP nutrition education and obesity prevention activities makes it impossible to compile a comprehensive listing of all allowable and unallowable costs. FNS will make all final judgments on what activities support the delivery of SNAP-Ed. Such activities may include, but are not limited to, the following:

1. Providing nutrition education and obesity prevention services to SNAP participants and low-income individuals eligible for other means-tested Federal programs. A person whose income is less than or equal to 185 percent of the Federal poverty guidelines is income-eligible for SNAP-Ed with certain exceptions.
2. Promoting and conducting physical activity to members of the SNAP-Ed population in conjunction with SNAP-Ed activities. Appendix E, Physical Activity.
3. Gardening for the purposes of educating SNAP-Ed participants about producing healthful foods. Appendix E, Gardening.
4. Breastfeeding Promotion - Activity must be conducted in collaboration with the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC Program). Appendix E, Breastfeeding.
5. Collecting information for use in providing nutrition education and obesity prevention services to the SNAP-Ed audience. Examples include: (a) measuring height and weight in assessing BMI, as preparation for discussing the prevention or management of overweight and obesity; and (b) administering dietary intake questionnaires on nutritional knowledge and behaviors.

The following are not SNAP-Ed activities and their costs are not allowable charges:

1. SNAP Outreach
2. Medical Nutrition Therapy, Appendix C, Definition of Terms
3. Providing SNAP-Ed services to persons not eligible for SNAP benefits. Appendix E, College & University Students
4. Clinical Health Assessments of SNAP-Ed population. This activity includes obtaining clinical data on and assessing the presence of chronic disease or the risk thereof of members of the SNAP-Ed target audience. Such assessments include the measurement of blood pressure, cholesterol, blood glucose, iron levels, etc. Such activities are not part of SNAP-Ed; this information may be obtained from medical sources, if needed.

### **What Federal cost principles apply to SNAP-Ed costs?**

The Federal cost principles identify certain criteria that an allowable cost must satisfy. These criteria include, but are not limited to, the following:

1. Reasonable Costs

A reasonable cost is one that a reasonable, prudent person would opt to incur under the circumstances. Factors to consider in determining reasonableness include:

- a. Did the State agency receive a program benefit that is generally commensurate with the dollar amount incurred?
- b. Is the cost proportionate to costs incurred for other, comparable goods or services?
- c. What is the cost item's priority *vis-à-vis* competing demands on limited administrative resources?

## 2. Necessary Costs

Refers to the cost item's relationship to the program's mission and objective(s). Factors to consider necessity include:

- a. Is the cost item needed to carry out the program?
- b. Can the cost item be foregone without adversely impacting the program's operations?
- c. Will incurring the cost duplicate existing efforts?

## 3. Allocable Costs

Allocation entails correlating costs with the program benefits obtained by incurring them. If a cost item benefits only SNAP-Ed, then 100 percent of it is allocable to SNAP-Ed. If a cost benefits multiple programs or activities, a portion of the cost is allocable to each. That portion must be proportionate to the benefit each program received.

To illustrate, a broader audience may benefit from a nutrition education effort whose cost is otherwise allowable under SNAP-Ed. In such a case, FNS may allow prorated costs that reflect SNAP-Ed's proportionate share of the total cost. The calculation of SNAP-Ed's share of the total cost is based on the number of the likely SNAP-Ed target audience that will receive the nutrition education and obesity prevention services relative to the total population to be reached. For example, if a SNAP-Ed project will reach 100 persons and 20 of these persons are from SNAP-Ed target audience, then 20% of the total costs may be counted as SNAP-Ed costs.

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

## 4. Costs Requiring Prior Approval

- a. Expenditures for Capital Equipment.

The State agency must obtain prior Federal approval before procuring or requesting payment 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 must be maintained for equipment that is paid for with Federal funds. A physical inventory is required not less frequently than once every two years.

b. **Costs Related to State Plan Amendments.**

Should a State agency make changes to a SNAP-Ed Plan, the State must submit a plan amendment for Federal approval prior to incurring the related expenses in order to ensure that costs meet all criteria for allowability. Further, if the scope of the activities in a Plan change, regardless of the impact on the planned expenditures, a State must submit a plan amendment for FNS approval 7CFR 277 (OMB Circular A-87). See instructions regarding Plan Amendments in Section 2, the ***SNAP-ED Plan Process***.

**Where can we locate the Federal cost principles?**

Allowable costs are specified in the following sources:

**OMB Guidance:**

- 2 CFR 225 (OMB Circular A-87): cost principles for State and local governments;
- 2 CFR 220 (OMB Circular A-21): cost principles for universities,
- 2 CFR 230 (OMB Circular A-122): cost principles for not-for-profit organizations;
- 2 CFR 215 (OMB Circular A-110): administrative requirements for universities, hospitals, and not-for-profit organizations.

**USDA departmental regulations:**

- 7 CFR 3016: administrative requirements for State and local governments;
- 7 CFR Part 3019: administrative requirements for universities, hospitals, and not-for-profit organizations (USDA codification of OMB Circular A-110).

**Program-specific guidance:**

- SNAP regulations at 7 CFR 277;
- FNS policy statements.

**What specific items of cost are allowable charges to SNAP-Ed?**

Allowable administrative costs are operational costs of carrying out SNAP-Ed in accordance with the State's approved SNAP-Ed Plan. Lists of allowable and unallowable cost items appear in Appendix B of 2 CFR 225 (A-87) and 2 CFR 230 (A-122), and in section J. of 2 CFR 220 (A-21). However, the vast array of possible costs precludes giving a comprehensive list in either the OMB guidance or this Guidance. The OMB guidance states that its failure to mention a particular item of cost does not imply that the cost is either allowable or unallowable; rather, administering agencies should determine allowability on a case-by-case

basis, considering the treatment or standards given in the OMB guidance for similar or related items of cost. Allowable administrative expenses include, but are not limited to:

- Salaries and benefits of personnel involved in SNAP-Ed and administrative support.

All staff wages, salaries, and benefits must 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 and salaries are not necessarily commensurate with compensation that would be paid to the individual when performing duties for which he/she is credentialed, but shall relate to the task they are actually performing for SNAP-Ed.

Staff must record time as specified in this Guidance and the underlying regulations and OMB circulars. For more information, see Appendix E, Documentation of Staff Time & Effort

- Office equipment, supplies, postage, and duplication costs that are necessary to carry out the project's objectives.
- Charges for travel necessary to fulfill the approved Plan. The travel must conform to official State, local, or university travel regulations. Allowable travel costs are subject to restrictions, such as prohibiting the charging of commercial airfare in excess of coach or its equivalent. Appendix E, Travel
- Development and production of SNAP-Ed materials when no other appropriate materials exist.
- Memberships, Subscriptions, and Professional Activities.

Costs of institution memberships in business, technical, and professional organizations are allowable.

Costs of individual memberships for nutrition personnel that work in SNAP-Ed are also allowable, but must be prorated according to the percentage of time actually spent by them directly with the SNAP-Ed project.

Professional registration or license fees paid by individuals are unallowable costs because the fees would be considered personal expenses, not institutional expenses.

- Lease or rental costs.
- Maintenance expenses.
- indirect costs. Appendix E, Indirect Costs
- Nutrition Education Reinforcement Materials. Appendix E, Nutrition Education Reinforcement Materials
- Cost of Using Publicly-Owned Building Space. Includes depreciation or use allowance derived based on the building's original acquisition cost, and such building-related costs as maintenance and utilities; Must not charge costs of maintenance, utilities, etc. directly if they are already charged as indirect costs. Appendix E, Valuation of Publicly Owned Space

### **What specific cost items are not allowable as charges to SNAP-Ed?**

Unallowable administrative expenses include, but are not limited to:

- Advertising and Public Relations - Except where incurred for recruitment of staff, acquisition of material for the grant, or publishing the results or accomplishments of the grant. Costs incurred to publicize the organization, as opposed to the grant, are unallowable;
- Alcoholic Beverages;
- Bad Debts - Includes losses represented by accounts or claims written-off as uncollectible and related costs. The related costs associated with delinquent debts for which the State continues to pursue collection are allowable;
- 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 but there are exceptions. For example, OMB regulations cite meals might be allowable within the context of training. Other costs here might require a “reasonable judgment” based on why or when the activity takes place;
- Fines and Penalties - Includes fiscal penalties, damages, and other settlements resulting from failure to comply with Federal, State, or local laws and regulations;
- General Government Costs - Include costs of the Governor’s Office, the State Legislature, the Judiciary, etc. While such costs are generally unallowable, some may be charged as direct costs to a Federal grant if they clearly benefit that grant. For example, if a person assigned to the Governor’s Office devotes 100 percent of his/her time to SNAP, the cost of his/her compensation may be allowable. Each situation must be judged on its own merit;
- Goods and Services for Private Use;
- Indemnification - payments to third parties and other losses not covered by insurance;
- Lobbying;
- Losses Not Covered by Insurance - See Indemnification above. These costs are similar, but not the same;
- Medical Equipment used in clinical health assessment;
- Pre-agreement Costs - Costs incurred prior to the effective date of the grant award are unallowable unless approved in advance by FNS;
- Under Recovery of Costs under Federal Grants - A shortfall in one Federal grant cannot be recovered by charging it 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 funding agencies benefit from the activity funded. However, an allocations basis must be established for sharing the costs in proportion to the benefit each receives;
- Volunteer Services - Under 7 CFR 277.4(e), the value of volunteer services, does not represent any State expenditure or outlay; is therefore not a program cost; and is not payable to the State agency from Federal funds.

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

- 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;
- 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;
- Scholarships and Student Aid - There are exceptions which should be reviewed if these costs appear in budget;
- Student Activity Costs.

## Other Federal Policies Relevant to Administration of SNAP-Ed?

### Federal Royalty Rights

Under 7 CFR 3016.34, FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use, or authorize others to use videos, photocopies, illustrations, computer programs such as DVDs, CD-ROMs, and related source codes, literature, or other products produced with SNAP funds for government purposes. The State and local agencies may sell videos, photocopies, illustrations, or literature to other States for SNAP-Ed 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 such as videos, literature, etc. paid with Federal dollars, it shall report the amount to FNS as program income on the SF-425 form. Any program income earned through the sale of print and audiovisual materials produced under the grant must be used to reduce the cost of the grant to FNS. 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.

### Partnering With Health Care Organizations

The allowability of this type of partnership for the delivery of SNAP-Ed hinges on whether the organization is public or private. The organization's profit or non-profit status is not relevant. There are three areas to consider carefully when initiating a new contract or managing an existing SNAP-Ed program that utilizes a health care organization:

1. 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.
2. While the nature of a public health care organization may mean that SNAP participants and eligible households will be involved, the health care organization should still validate that it meets target audience categories described in this Guidance. Additionally, the health care organization should meet the provisions of allowable SNAP-Ed activities, which states that health promotion and primary

prevention of disease should be the focus and aim of SNAP-Ed activities. The disposition of these types of health care organizations already leans towards secondary prevention and medical nutrition therapy, which are not allowable SNAP-Ed expenditures.

3. 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.

### **Partnering With 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. SNAP-Ed helps contribute to community health and wellness goals by providing nutrition education and obesity prevention services within eligible schools and eligible venues. These activities help generally low-income students and their families make decisions in accordance with the Dietary Guidelines and MyPlate. While SNAP-Ed may pay for activities directed to the SNAP-Ed target audience, 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.

## Examples of Allowable and Unallowable Costs

ALLOWABLE	UNALLOWABLE
<b>Literature/Materials/Audiovisuals</b>	
<ul style="list-style-type: none"> <li>• The purchase of FNCS nutrition education/promotion materials that address SNAP-Ed topics and are for use with or distribution to the SNAP-Ed audience.</li> <li>• The purchase of other nutrition education materials, when there are no FNCS materials available that address SNAP-Ed topics and will be used with or distributed to the SNAP-Ed target audience.</li> <li>• The production of nutrition education materials, for which no other comparable materials exist that support the State's goals and objectives for SNAP-Ed and will be used with or distributed to the SNAP-Ed audience. States are encouraged to collaborate with other FNS programs on the messages conveyed in nutrition education materials and in sharing the production costs.</li> </ul>	<ul style="list-style-type: none"> <li>• Costs for any nutrition education materials that have already been charged to another Federal or private program or source.</li> <li>• Any material that endorses or promotes brand name products or retail stores.</li> <li>• Manufacturer's or store (cents off) coupons.</li> <li>• Production of written or visual messages whose principal purpose is to influence a store's pricing policy.</li> <li>• Purchase or production of written or visual material for purposes of lobbying or influencing Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum, or initiative.</li> <li>• Purchase or production of written or visual nutrition education messages, that are not consistent with the current Dietary Guidelines for Americans and MyPlate.</li> </ul>
<b>Social Marketing Campaigns</b>	
<ul style="list-style-type: none"> <li>• Local radio and television announcements of nutrition education events for the SNAP-Ed target audience.</li> <li>• Appropriate social marketing campaigns that target nutrition messages to the SNAP-Ed target audience and are delivered in areas/venues where at least 50 percent of persons are income-eligible for the SNAP.</li> </ul>	<ul style="list-style-type: none"> <li>• Social marketing campaigns that target the general population. In some instances, prorated costs based upon the number of the SNAP-Ed target audience that will be reached with the campaign may be allowed. FNS may consider alternate methods with justification.</li> <li>• Publication or dissemination of nutrition education messages that are inconsistent with the current Dietary Guidelines for Americans and MyPlate.</li> <li>• Television and radio announcements/advertisements that do not include a brief message about the SNAP, its benefits, and how to apply.</li> </ul>

ALLOWABLE	UNALLOWABLE
<b>Equipment</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Equipment shared with non-SNAP users when cost-shared with those users</li> <li>• Kitchen appliances, only with justification of need.</li> </ul>	<ul style="list-style-type: none"> <li>• Expenditures for equipment that exceeds prior approval thresholds, i.e. \$5,000 per unit, unless prior approval is received from FNS.</li> <li>• Medical equipment except for inexpensive equipment such as anthropometric measuring tools if needed that can be used to measure height and weight to determine and discuss BMI and calorie balance/physical activity.</li> </ul>
<b>Food Samples, Supplies and Provisions</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Food samples associated with nutrition education lessons.</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing snack or food service</li> <li>• Meal sized portions or complete meal service</li> <li>• Cost of food provided as groceries or supplemental food</li> </ul>
<b>Nutrition Education</b>	
<ul style="list-style-type: none"> <li>• Classroom setting (salaries, space, equipment, materials) for SNAP Ed audience on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class shall be to provide nutrition and obesity prevention education. If nutrition and obesity education is included with other topics, only that portion of class pertaining to these topics are an allowable costs.</li> <li>• Physical activity demonstration, promotion, referral that includes a nutrition-related message based on Dietary Guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>• Classes that are designed to provide case management or "life skills" training such as classes on English as a second language, parenting, child development, crisis management, rental information.</li> <li>• Medical nutrition therapy and secondary prevention interventions. Appendix C, Definitions.</li> <li>• Weight loss classes, individualized meal plans, obesity treatment programs, etc.</li> <li>• Gym memberships, trainers, gym equipment, or facilities. Appendix E, Physical Activity.</li> </ul>

ALLOWABLE	UNALLOWABLE
<b>Nutrition Education</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Breastfeeding education, promotion, and support which is coordinated with WIC and which supplements and complements WIC services, rather than duplicating or supplanting them.</li> <li>• Activities where the primary objectives pertain to allowable nutrition education but brief SNAP outreach messages are shared with SNAP-Ed participants. Free SNAP information materials are available on the FNS Web site at: <a href="http://www.fns.usda.gov/SNAP//outreach/info.htm">http://www.fns.usda.gov/SNAP//outreach/info.htm</a></li> </ul>	<ul style="list-style-type: none"> <li>• Clinical health screening (i.e., cholesterol testing, and blood glucose testing, etc).</li> <li>• Distribution of nutrition education reinforcement items costing over \$4.00 each.</li> <li>• Nutrition education costs that are charged to another Federal program such as WIC, EFNEP, Head Start, etc.</li> <li>• Breastfeeding education, promotion, and support that duplicates or is provided through WIC, EFNEP, or Head Start funding.</li> <li>• Education provided to incarcerated or institutionalized persons that are not eligible for SNAP</li> <li>• Most able-bodied students ages 18 through 49 enrolled in college or other institutions of higher education at least half time are not eligible for the SNAP and SNAP-Ed. For information on students that may be eligible: <a href="http://www.fns.usda.gov/SNAP/applicant_recipients/students.htm">http://www.fns.usda.gov/SNAP/applicant_recipients/students.htm</a></li> <li>• Activities where the primary objective(s) is (are) to conduct outreach efforts for SNAP or other programs.</li> </ul>
<b>Space Allocation</b>	
<ul style="list-style-type: none"> <li>• Space allocated to SNAP-Ed and other programs under a plan whereby the method of space/cost allocation between programs is documented and the costs are tracked.</li> <li>• Space donated by local school districts, but only the cost of the space based on depreciation or use allowance.</li> </ul>	<ul style="list-style-type: none"> <li>• Commercial rental space charges cannot be used for publicly owned space.</li> </ul>

ALLOWABLE	UNALLOWABLE
<b>Staff Compensation and Training Costs</b>	
<ul style="list-style-type: none"> <li>• SNAP-Ed-related training for program delivery staff.</li> <li>• Staff time spent delivering nutrition education and obesity prevention services to the SNAP-Ed target audience. Time must be charged at a rate commensurate with the duties being performed.</li> <li>• General briefings to community health care providers serving low-income communities about SNAP-Ed services in the community.</li> </ul>	<ul style="list-style-type: none"> <li>• The time volunteers of a non-public agency, e.g., faith-based organizations, many food banks, etc. spend performing SNAP-Ed specific duties.</li> <li>• 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.</li> <li>• University courses that are not relevant to the practical delivery of SNAP-Ed to the SNAP population.</li> <li>• Training or development costs of food service workers or others not directly associated with delivery of SNAP-Ed.</li> </ul>
<b>Costs Associated with Other Activities</b>	
<ul style="list-style-type: none"> <li>• Reimbursement for personal costs such as childcare, meals, lodging, and transportation for recipients of SNAP-Ed to actively participate in focus groups, needs assessment, and advisory groups to inform and improve SNAP-Ed effectiveness.</li> <li>• Nutrition education activities that promote the selection of healthy foods from vending machines.</li> <li>• Participation on relevant State and local advisory panels.</li> </ul>	<ul style="list-style-type: none"> <li>• Organized efforts to influence elected officials and lobbying for legislative/policy changes.</li> <li>• Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely SNAP-Ed population.</li> <li>• Costs associated with the establishment and maintenance of certain environmental or policy changes, such as infrastructure, equipment, space, land, or construction.</li> <li>• Money, vouchers, or passes provided to SNAP-Ed recipients to offset personal costs incurred so that they may attend nutrition education and obesity prevention classes, e.g., for childcare and transportation expenses.</li> <li>• Childcare or transportation services provided for SNAP-Ed recipients in conjunction with SNAP-Ed activities.</li> <li>• Reinforcement items costing over \$4.00 each. Appendix E, Nutrition Education Reinforcement Items</li> </ul>



# Supplemental Nutrition Assistance Program Education Guidance

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## Appendices

- A**            **Optional Report and Plan Templates**
- B**            **Reporting and Record Retention Requirements**
- C**            **Definitions**
- D**            **Acronyms**
- E**            **Financial and Cost Policy Supplement**
  - Physical Activity
  - Gardening
  - Breastfeeding
  - College and University Students
  - Documentation of Staff Time & Effort
  - Cost of Travel and Attending Meetings & Conferences
  - Indirect Costs
  - Nutrition Education Reinforcement Materials
  - Valuation of Publicly Owned Space
- F**            **SNAP-Ed Connection**
- G**            **Notes About Materials**

# Optional Report and Plan Templates

## Appendix A. Template 1

### Section A: SNAP-Ed Narrative Annual Report 7 CFR 272.2 (i) OMB No. 0584-0083

**Template Directions:** Consolidate all Implementing Agency information into one State annual report using the template below. Refer to the Definitions Section for terms used in this template.

#### 1. SNAP-Ed Program Overview:

**Directions -** Provide a one page (not more than 500 words) **executive summary** of SNAP-Ed activities during the reporting fiscal year. Please include the following as applicable:

- Progress in Achieving Overarching Goal(s):
  
- Number of New Projects implemented during the reporting year by primary approach (Direct, Indirect, and Social Marketing):
  
- Number of ongoing projects that were operational during the reporting year by primary approach (Direct, Indirect and Social Marketing):
  
- Major Achievements (not already addressed):
  
- Major Setbacks, if any:
  
- Overall Assessment:

**Appendix A. Template 1 Section A Continued:**

**2. SNAP-Ed Administrative Expenditures**

**Directions** - To help FNS better understand State SNAP-Ed administrative expenditure costs, provide the percent and dollar value of administrative expenses used for each Implementing Agency (IA) in the State for each of the following categories. **To estimate the % of total administrative expenditures, use the data you compiled for question 10 on the EARS report. In the example below, administrative expenditures for X State University = \$550,000.**

Type of Administrative Expense:	% of Total Administrative Expenditures for each Implementing Agency by Type of Expense					
	Name of IA: Example: X State U		Name of IA:		Name of IA:	
	% values	\$ values	% values	\$ values	% values	\$ values
Administrative Salary	40%	\$220,000				
Administrative Training Functions	15%	\$82,500				
Reporting Costs ( identify % related to EARS, if possible)	3%	\$16,500				
Equipment/Office Supplies	10%	\$55,000				
Operating Costs	10%	\$55,000				
Indirect Costs	12%	\$66,000				
Overhead Charges (space, HR services, etc.)	10%	\$55,000				

### 3. SNAP-Ed Evaluation Reports Completed for this Reporting Year

Using the chart below, identify the type(s) of SNAP-Ed evaluations (by project) that resulted in a written evaluation report of methods, findings and conclusions. Use the definitions of each type of evaluation that are provided in Box 1 (on the following page). Include a **copy** of each **evaluation report that was produced in the appendix to this report**. Impact evaluation reports should include the components described in Box 2 (on the following page). **Each evaluation report should identify clearly the associated project name(s) on the cover or first page.**

Project Name	Key Project Objective(s)	Target Audience	Check all Evaluation Types for which Reports Are Included*			
			FE	PE	OE	IE

\* FE = Formative Evaluation    PE = Process Evaluation    OE = Outcomes Evaluation    IE = Impact Evaluation

## Appendix A. Template 1 Section A Continued:

### Box 1-Evaluation Definitions:

**Formative Evaluation (FE)** usually occurs up front and provides information that is used during the development of an intervention. It may be used to determine if a target audience understands the nutrition messages or to test the feasibility of implementing a previously developed intervention in a new setting. Formative research results are used to shape the features of the intervention itself prior to implementation.

**Process Evaluation (PE)** systematically describes how an intervention looks in operation or actual practice. It includes a description of the context in which the program was initiated such as its participants, setting, materials, activities, duration, etc. Process assessments are used to determine if an intervention was implemented as intended. The findings answer the question of *what* worked or didn't work.

**Outcome Evaluation (OE)** addresses the question of whether or not anticipated group changes or differences occur in conjunction with an intervention. Measuring shifts in a target group's nutrition knowledge before and after an intervention is an example of outcome evaluation. Such research indicates the degree to which the intended outcomes occur among the target population. It does not provide definitive evidence, however, that the observed outcomes are due to the intervention.

**Impact Evaluation (IE)** allows one to conclude authoritatively, whether or not the observed outcomes are a result of the intervention. In order to draw cause and effect conclusions, impact evaluations incorporate research methods that eliminate alternative explanations. This requires comparing those (e.g., persons, classrooms, communities) who receive the intervention to those who either receive no treatment or an alternative intervention. The strongest impact evaluation randomly assigns the unit of study to treatment and control conditions, but other quasi-experimental research designs are sometimes the only alternative available.

### Box 2-Impact Evaluation:

Include the following items in each impact evaluation report:

- **Name of the Project**
- **Project Goals (specifically those evaluated)**
- **Evaluation Design:** Describe the unit of assignment to intervention and control or comparison groups. Describe how assignment to these groups was carried out. Be explicit about whether or not this assignment was random. Describe how many units (and individuals if they were not the unit of assignment) were in the intervention and control or comparison groups at the start and end of the study.
- **Impact Measures:** Describe the measure(s) associated with each intervention goal. Describe the points at which data were collected and how. If there were any differences in measures for intervention and control or comparison groups, describe them.
- **Findings:** Describe the measurement results for intervention and control or comparison groups at each point data were collected.
- **Description of how evaluation results will be used:**
- **Point of Contact:**
- **Relevant Journal References:**

## Appendix A. Template 1 Section A Continued:

### 4. SNAP - Ed Planned Improvements:

**Directions** - Describe any modifications planned for in the next fiscal year to improve the effectiveness of specific SNAP-Ed projects and/or to address problems experienced during the past year. Please identify the specific project(s).

### 5. EARS Feedback:

**Directions:** For this reporting year, provide FNS feedback on State implementation of EARS. Include the following as applicable:

- Comments regarding any challenges you encountered in gathering and reporting data for EARS and actions taken to resolve or address these challenges: **Identify the section and item number when making comments. For example: Comment: Question 10. It was challenging to get this information. We addressed this by providing all partners with spreadsheets and training to help them track these costs.**
- Does FNS need to provide additional EARS training or resources? If yes, specify training topics and/or type of resources needed.
- What, if any, changes did you make in your IT system or manual data collection procedures for EARS in the prior fiscal year? If available, attach a description of updated IT systems and/or manual data collection procedures.
- Do you plan to make any changes in your IT system or manual data collection procedures for EARS in the next FY? If yes, provide a short summary of changes planned.
- Will all IAs report actual unduplicated data for EARS in the upcoming fiscal year? If not, why?
- Share suggestions for modifications to the EARS form, if any. Indicate how the modification would improve EARS, i.e. the reporting process for State, data quality, etc. **Identify the section and item number when making suggestions please. For example: Direct Ed Section, Question 3, Race and Ethnicity. Consider adding a narrative field to allow IAs to make notations about the data or the collection procedures. +**
- Other comments.

## Appendix A. Template 1. Section A Continued:

### 6. Appendices:

**Directions** - Attach evaluation reports included under item # 3. **Optional**- States may also provide a brief description or information that highlights other SNAP-Ed projects that are not reported under the sections above. For example, share information about:

- Staff/Partner Trainings
- Conference presentations and or journal publications
- Curriculum development
- Partnership activities
- Case studies
- Awards

## Appendix A. Template 1 Section B: SNAP-Ed Annual Report

Summary for Impact Evaluations FY\_\_7 CFR 272.2 (i) OMB No. 0584-0083

### Section B: SNAP-Ed Annual 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.

#### 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 SNAP-Ed participants more likely than non-participants to report they intend to increase their fruit and vegetable intake? Or do a greater proportion of SNAP-Ed 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

##### 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.

## 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, you may:*

**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 \_\_\_\_ SNAP-Ed Plan Proposed Projects

### Section A: Identifying and Understanding the Target Audience

7 CFR 272.2 (e) OMB No. 0584-0083

#### Needs Assessment Methodology & Findings

##### Needs Assessment Methodology

*Describe and justify your methodology for assessing the needs of the Supplemental Nutrition Assistance Program (SNAP) target audience in the State.*

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

2. New Information Collection (source and content):

##### Needs Assessment Findings

#### 1. Demographic Characteristics of Supplemental Nutrition Assistance Program (SNAP) Target Audience in *[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. Section A Continued:**

**2.Related Behavioral And Lifestyle Characteristics Of Supplemental Nutrition Assistance Program (SNAP) Target Audience In *[State]***

*If information is available, discuss implications of dietary and food purchasing habits and where and how SNAP target population eat, redeem SNAP benefits, live, learn, work, and play in your State. Cite sources of information.*

**3.Other Nutrition-Related Programs Serving Low-Income Persons In *[State]***

*Discuss the availability of other nutrition-related programs, services, and social marketing campaigns (i.e., EFNEP, Child Nutrition services, etc).*

**4.Areas Of *[State]* Where Supplemental Nutrition Assistance Program Target Audience Is Underserved or Have Not Had Access To SNAP-Ed Previously**

**5.Implications of Your Needs Assessment and How These Findings Were Applied To This Current Year's SNAP-Ed Plan**

## Appendix A. Template 2 FY \_\_\_\_\_ SNAP-Ed Plan Proposed Projects

### Section B: State SNAP-Ed Goals, Objectives, Projects, Campaigns, Evaluation, and Collaboration 7 CFR 272.2 (e) OMB No. 0584-0083

#### 1. State Level Goals & Objectives

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

##### a. State Level Goals

##### b. State Level Objectives

## Appendix A. Template 2 Section B Continued:

1. 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 SNAP Target Audience.**

*Describe how the project will focus education on SNAP target audience.*

**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.*

## **2. 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.*

## **3. 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. Outline any tasks in the action plan process that SNAP-Ed will lead or conduct during the FY. Attach written agreements.*

**Appendix A. Template 3 SNAP-Ed Plan Staffing 7 CFR 272.2 (d) (2) (i) OMB No. 0584-0083**

**Section C: Staffing**

See page 21-22 for detailed instructions on completing this template. Provide the following summary by Supplemental Nutrition Assistance Program Education (SNAP-Ed) project for all paid staff in the budget. Provide the Full Time Equivalents (FTE), describe staff responsibilities as they relate to SNAP-Ed and note the funding amounts that will be paid by State and/or Federal funds.

Project Name:				
1. Position Title*	2. FTEs** charged to SNAP-Ed	3. Description of Job Duties		4. SNAP-Ed Salary, Benefits and Wages
*Attach statement of work listing SNAP-Ed-related job duties for each position.	**Attach definition of FTE and basis for calculations.	Percentage of SNAP-Ed Time spent on Management/Administrative Duties	Percentage of SNAP-Ed Time spent on Direct SNAP-Ed Delivery	Federal Dollars only
<b>Total</b>				

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**Section D: Budget Summary**

Refer to Appendix E 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 Federal Funding, grant
- c) Description of services and/or products
- d) Cost of specific services and/or products

**2. Project costs**

For each sub-grantee, provide the 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. Section D Continued:

3. Budget Information by Project

Sub-grantee Name (if applicable):

Expenses *		Federal Funds
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	
10	<b>Total Direct Costs</b>	
11	Indirect Cost***	
12	<b>Total Costs</b>	

\*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. Section D Continued:**

**4. Travel 7CFR 277 (OMB Circular A-87) OMB No. 0584-0083**

*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 SNAP-Ed target audience. Provide the following information for all travel included in your SNAP-Ed budget:*

**A. In-State Travel**

- **Travel Purpose**

1. How attendance will benefit SNAP-Ed program goals and objectives
2. Justification of need for travel
3. Travel Destination (city, town or county or indicate local travel)
4. Number of Staff Traveling
5. Cost of Travel for this Purpose

- **Total In-State Travel Cost**

**B. Out-of-State Travel**

- **Travel Purpose and/or Name of Conference**

1. How attendance will benefit SNAP-Ed program goals and objectives
2. Justification of need for travel
3. Travel Destination (city and state)
4. Number of Staff Traveling
5. Cost of Travel for this Purpose

- **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).**

Appendix A. Template 5: SNAP-Ed Plan Assurances 7 CFR 272.2 (d) (2) (iii) and OMB No. 0584-0083

Section F.

To assure compliance with policies described in this guidance, the SNAP-Ed plan shall include the following assurances. Mark your response to the right.

SNAP-Ed Plan Assurances	YES	NO
1. The State SNAP agency is accountable for the content of the State SNAP-Ed Plan and provides oversight to any sub-grantees. The State SNAP agency is fiscally responsible for nutrition education activities funded with SNAP funds and is liable for repayment of unallowable costs.		
2. Efforts have been made to <u>target</u> SNAP-Ed to the SNAP-Ed target population.		
3. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) are claimed under the SNAP-Ed grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional SNAP-Ed individuals or to provide additional education services to EFNEP clients who are eligible for the SNAP. Activities funded under the EFNEP grant are not included in the budget for SNAP-Ed.		
4. Documentation of payments for approved SNAP- Ed activities are maintained by the State and will be available for USDA review and audit.		

**Appendix A. Template 5: Continued:**

To assure compliance with policies described in this guidance, the Supplemental Nutrition Assistance Program Education Plan shall include the following assurances.

Mark your response to the right.

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

Section F:

Supplemental Nutrition Assistance Program (SNAP)

Annual Plan for SNAP-Ed  
for

STATE AGENCY: \_\_\_\_\_

DATE: \_\_\_\_\_

FY \_\_\_\_\_

**Certified By:**

_____	_____
STATE SNAP-Ed COORDINATOR	DATE
or	
STATE SNAP AGENCY DIRECTOR	

**Certified By:**

_____	_____
STATE SNAP AGENCY FISCAL REVIEWER	DATE



**Appendix A. Template 8: Sample Time and Effort Documentation OMB No. 0584-0083**

Refer to Appendix E for instructions on time and effort documentation.

**Time and Effort Documentation for hours worked specifically on  
Supplemental Nutrition Assistance Program Education**

Name \_\_\_\_\_ Location \_\_\_\_\_ Title/Position \_\_\_\_\_

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
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31	
<b>Monthly Total:</b>	

Month:	
Day	Hours Worked
1	
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3	
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31	
<b>Monthly Total:</b>	

Month:	
Day	Hours Worked
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29	
30	
31	
<b>Monthly Total:</b>	

Employee signature & date: \_\_\_\_\_  
Supervisor signature & date: \_\_\_\_\_

Quarter Total: \_\_\_\_\_

## **Appendix B:**

### **Reporting and Record Retention Requirements**

#### **Form 366A-State Agency 7CFR 272.2 OMB No. 0584-0083**

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 15<sup>th</sup> 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**

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. An annual 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**

SNAP 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 SNAP.

## Appendix C Definition of Terms

**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 SNAP-Ed program
- Cost of training for performing administrative functions like record keeping and accounting, etc.
- Cost of reporting SNAP-Ed 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)

**Allowable Cost** refers to costs that are reimbursable from Federal program funds because they support SNAP-Ed and conform to government-wide and SNAP-specific cost policy.

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

**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, SNAP, 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 SNAP. 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. Between the 2000 Decennial Census and the 2010 Census the Bureau of Census developed and began collecting the American Community Survey (ACS) largely the same information as collected in the decennial census. In 2011, the Bureau released a 5-year ACS data file for 2005-2009. This file may be used in targeting audiences in SNAP-Ed delivery.

**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 Appendix E, Indirect Costs.

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, is an annual data and information collection process completed by SNAP State Agencies. It collects uniform data and information on nutrition education activities funded by SNAP 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.

**Evidence-based Approach** for nutrition education and obesity prevention is defined as the integration of the best research evidence with best available practice-based evidence. The best research evidence refers to relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence. Practice-based evidence refers to case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential.

Evidence may be related to obesity prevention target areas, intervention strategies, and/or specific interventions. The target areas are identified in the current Dietary Guidelines for Americans. Intervention strategies are broad approaches to intervening on specific target areas. Interventions are a specific set of evidence-based, behaviorally-focused activities and/or actions to promote healthy eating and active lifestyles. Evidence-based allowable use of funds for SNAP-Ed include conducting and evaluating intervention programs, and

implementing and measuring policy, systems, and environmental changes in accordance with SNAP-Ed Guidance.

**Fiscal Year** is the Federal Fiscal Year that runs from October 1<sup>st</sup> of one year through September 30<sup>th</sup> 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.

**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 SNAP-Ed Plan, but shall clearly state the definition and the basis for the calculation.

**Grantee** means the agency of the State responsible for administering SNAP. Federal funds are paid to this agency for all food costs, and for 100 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 100 percent of all allowable nutrition education costs on a payment 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 SNAP-Ed plan shall 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 SNAP, 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 outside the scope of SNAP-Ed, and their cost is unallowable. Allowable SNAP-Ed activities focus on primary prevention of disease. Accordingly, they include activities to help the SNAP-Ed population to prevent or to postpone the onset of chronic disease by establishing more physically active lifestyles and healthier eating habits. By contrast, medical nutrition therapy is a secondary intervention that focuses on helping people already afflicted with the disease to cope with and its effects and prevent additional disability.

Medical Nutrition Therapy Services are **not allowable** SNAP-Ed 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.

**Outreach** is providing information or assistance to individuals who might be eligible for the SNAP <http://www.fns.usda.gov/SNAP/> in order to help them make an informed decision whether to apply for the Program. State SNAP 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](http://www.census.gov/hhes/www/poverty.html)

**Project** means a discrete unit of nutrition education or obesity prevention intervention at the local level, which is distinguished by a specifically identified low-income target population.

**Public Education Outreach Message** is a brief message providing information on the availability, benefits, and application procedures for SNAP, preferably with information on

local application sites, (or a toll-free number, or other useful information on how to find services

**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 SNAP-Ed.

**SNAP Nutrition Education and Obesity Prevention Services** are any combination of educational strategies, accompanied by environmental supports, designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low-income individuals eligible to participate in SNAP and other means-tested Federal assistance programs. Nutrition education and obesity prevention services are delivered through multiple venues and involves activities at the individual, community, and appropriate policy levels. Acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans.

**SNAP-Ed Plan** is an official written document that describes SNAP-Ed services States may provide. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

**SNAP-Ed Target Audience** are SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs.

**Social-Ecological Framework for Nutrition and Physical Activity Decisions** illustrates how all elements of society, including individual factors (demographic factors, psychosocial, knowledge and skills, etc.) environmental settings (schools, workplaces, faith-based organizations, food retail establishments, etc.), sectors of influence (government, industry, media, public health and health care systems, etc.), social and cultural norms and values (belief systems, religion, heritage, body image, etc.) combine to shape an individual's food and physical activity choices, and ultimately one's calorie balance and chronic disease risk.

**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.

**Sub-grantee** means the organization or person to which a State agency, as grantee, takes an agreement to conduct nutrition education and obesity prevention activities. Federal funds pay the grantee for 100 percent its allowable administrative costs, including nutrition education. The grantee in turn generally will pay sub grantees for 100 percent 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.

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

## D: Acronyms

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 Education Program

ESLS- Eat Smart, Live Strong

FDPIR-Food Distribution Program on Indian Reservations

FNS- Food and Nutrition Service

FPRS- Food Program Reporting System

FY- Fiscal Year

FY- Federal Fiscal Year

ITO- Indian Tribal Organization

LYFFTF- Loving Your Family, Feeding Their Future

MOU- Memorandum of Understanding

NAL- National Agricultural Library

NIFA-National Institute of Food and Agriculture

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-Ed- Supplemental Nutrition Assistance Program Education

SNAP- Supplemental Nutrition Assistance Program

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

## E: Financial and Cost Policy Supplement

### Physical Activity

The 2008 Physical Activity Guidelines for Americans provide Guidance to help Americans improve their health through appropriate physical activities. FNS supports efforts to improve the health and fitness of our program participants consistent with the most current Dietary Guidelines for Americans and MyPlate. These efforts include:

- Activities to help participants eat a nutritious diet by providing and integrating physical activities and nutrition education benefits. Physical activity, particularly when combined with calorie intake, may aid weight loss and maintenance of weight loss.
- Activities to encourage physical activity every day by promoting active living and connecting people with community-based physical activity resources funded by other 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 SNAP-Ed is an allowable expenditure. The following is guidance on what constitutes allowable SNAP-Ed costs in support of the physical activity guideline in the Dietary Guidelines for Americans. Essentially, such allowable costs include activities that educate participants and promote physical activity, such as providing the SNAP-Ed audience with information and encouragement to make physical activity part of their lifestyle.

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 physical activity demonstration for the SNAP-Ed audience and training for staff to develop skills to help SNAP-Ed participants. Justification should be provided for ongoing activities.
- FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity material that are reasonable and necessary. All physical activity materials should include a nutrition education message that promotes healthy eating and link nutrition and physical activity. FNS encourages the use of existing materials, especially existing FNCS materials or materials available through the SNAP-Ed Connection. 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 actively promote and coordinate activities

### Examples of Beyond the Scope for SNAP-Ed Physical Activity Education and Promotion Costs

Costs incurred for health club or gym memberships, dues, large expenditure equipment (such as bicycles, treadmills, stair steps, weights, etc.); facilities (rental or modifications); ongoing classes, and exercise leaders for ongoing exercise classes are not allowed.

### Examples of Acceptable Physical Activity Education and Promotion Costs

SNAP State agencies may make physical activity education and promotion coupled with nutrition education available to SNAP Ed audience in a variety of economical ways. They may develop or adapt existing educational materials to teach physical activity concepts if these materials also promote nutrition education and when materials that address their target audience is not available.

Physical activity education and promotion as part of nutrition education sessions in the SNAP may include provision of advice, demonstrations (instructional in nature), nutrition education integrated into ongoing physical activity sessions, and community resource information, (such as a free local fitness event) in order to encourage the SNAP-Ed population to engage in regular physical activities. Allowable supply items must be of nominal value to meet the reasonable and necessary test.

### **Gardening**

Gardening is a beneficial activity that leads to the economical production and consumption of healthy and fresh food. Costs for the rental or purchase of garden equipment (fertilizer, tractors, etc.) or the purchase or rental of land for garden plots are not allowable. However, the purchase of seeds, plants, and small gardening tools and supplies to assist in developing school and community gardening projects are allowable SNAP-Ed costs. Educational supplies, curricula, and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. Participants may use program benefits to purchase seeds and plants for individual gardening purposes. FNS encourages State Agencies to coordinate with the Federal, State, local, and private initiatives that create sustainable gardens to benefit schools and communities through collaborative efforts.

### **Breastfeeding**

All SNAP-Ed activities that address the topic of breastfeeding must 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 SNAP-Ed supplementing existing WIC activities. A written agreement such as a Memorandum of Understanding stating the degree of collaboration and the specific responsibilities of WIC (i.e., staff, duties, and time) and SNAP should be included in the State SNAP-Ed Plan. This agreement shall be signed by all collaborating agencies.

## College and University Students

### Eligibility for SNAP Benefits and SNAP-Ed Services

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 SNAP and therefore not eligible to receive SNAP-Ed. However, a students may be able to get SNAP benefits participate in SNAP-Ed if otherwise income eligible and he/she:

- Gets public assistance benefits under a Title IV-A program;
- Takes part in a State or federally financed work study program;
- Works at least 20 hours a week;
- Takes care of a dependent household member under the age of 6;
- Takes care of a dependent household member over the age of 5 but under 12 and does not have adequate child care to enable him/her to attend school and work a minimum of 20 hours, or to take part in a State or Federally financed work study program; or
- Is assigned to or placed in a college or a 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 and Nutrition Act; or
  - An employment and training program operated by a State or local government.
- Is a single parent enrolled full time in college and taking care of a dependent household member under the age of 12, if otherwise eligible.

### Scholarships and Tuition

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 SNAP-Ed. In general, this is not a cost that would be necessary and reasonable for the purposes of SNAP-Ed. 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 SNAP-Ed is teaching nutrition education to the SNAP-Ed target audience. 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:

- There is a bona fide employer-employee relationship between the student and the institution for the work performed;
- 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;

- 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 SNAP-Ed 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 SNAP-Ed. If the student is working 50% of their time on SNAP-Ed, only 50% of the tuition may be charged to FNS. Again, a necessary and reasonable judgment should be made as to the purpose of the work and its impact on SNAP-Ed.

### **Documentation of Staff Time and Effort**

Biweekly certification of 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 SNAP-Ed**

- 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 SNAP-Ed**

- Time records are required for all nutrition education staff and volunteers devoting less than 100 percent of their time to SNAP-Ed 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 SNAP-Ed 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 SNAP-Ed, date, and employee and supervisor signatures. Only time spent on SNAP-Ed 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 SNAP-Ed. The staff person's time spent on SNAP-Ed shall be documented as specified above.

### **Cost of Travel and Conference Attendance**

Travel expenditures are a variable cost. In order to be considered for funding, the request shall provide a direct and clear link to providing nutrition education and obesity prevention activities for the SNAP-Ed audience.

**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.

#### **Travel Purpose and Justification**

- Justify the purpose of the travel request.
- How attendance will benefit SNAP-Ed program goals and objectives and how the travel request supports the State's SNAP-Ed goals and objectives.
- Demonstrate how information will be disseminated to in-state educators, collaborators, and SNAP office staff.

#### **Number of Staff Attending**

- Identify and 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.

### **Indirect Costs**

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 SNAP-Ed 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 SNAP-Ed 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 SNAP-Ed, the allowable activities are defined as those activities that provide nutrition education to the SNAP eligible population. Other activities, such as research and data analysis, are not the primary purpose of SNAP-Ed 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. The State agency should indicate, within the SNAP-Ed 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 SNAP-Ed Plan are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement.

## **Nutrition Education Reinforcement Materials**

Nutrition education reinforcement materials refers to a class of goods given to the SNAP-Ed audience or closely associated with SNAP such as staff that conveys nutrition messages and promotes good nutrition and physical activity practices. Such items must have a direct relationship to program objectives and the expected behavior change. Terms used to describe these items include memorabilia, souvenirs, promotional items, incentives, and educational extenders. Such items are allowable costs only if they are reasonable and necessary, contain or reinforce nutrition messages, and are of nominal value.

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:

- Target SNAP target audience;
- Have a clear relevance and useful connection to particular FNS/SNAP nutrition education messages;
- Contain an educational message or have a use that is directly relevant to reinforce nutrition education and obesity prevention messages;
- Have value as nutrition education and obesity prevention aids;
- 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. Items that would be considered not allowable include: celebratory items and items designed primarily as staff morale boosters; items that are not reasonable or necessary and/or have no nutrition education message; and any program incentive item intended for persons who are not SNAP eligible or potentially SNAP eligible.

## Valuation of Publicly Owned Space

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 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 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 SNAP share would be the amount of space that is used for the SNAP. A use allowance is used when the building is fully depreciated. The State is 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 dollar per square foot may be used for the cost of space
- .003265 dollar 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.

## Appendix F

### Supplemental Nutrition Assistance Program Education

#### (SNAP-Ed) Connection Web Site

The Food and Nutrition Service and the National Agriculture Library's Food and Nutrition Information Center (FNIC) sponsor the online resource, the SNAP-Ed Connection. The site provides educators with curricula, lesson plans, research, training, tools, and participant materials that address the needs of low-income audiences. The resources featured on the site are reviewed for basic quality. Their inclusion on the SNAP-Ed Connection does not constitute endorsement by USDA. The SNAP-Ed Connection is available at <http://snap.nal.usda.gov/>.

Major sections of the site include a Recipe Finder, Resource Library, Training Center, Hot Topics A-Z, and connection to National SNAP-Ed resources. The site also houses SNAP-Ed-Talk, an electronic mailing list for national, regional, State, and local SNAP-Ed providers for the discussion and sharing of information related to SNAP nutrition education. The Community Corner section includes information, tips, and tools to help consumers in making healthy lifestyle choices.

For information on how to share relevant videos, curricula, games, handouts, booklets, displays, web-based modules, lesson plans, etc., visit the SNAP-Ed Connection Sharing Center at: [http://www.nal.usda.gov/fsn/sharing\\_center\\_submission.shtml](http://www.nal.usda.gov/fsn/sharing_center_submission.shtml), send an email to [SNAP-Ed@nal.usda.gov](mailto:SNAP-Ed@nal.usda.gov), or call (301) 504-5414. To donate a copy of a new resource for review, please send it to:

SNAP-Ed Connection

Food and Nutrition Information Center

USDA/ARS National Agricultural Library

10301 Baltimore Avenue, Suite 105

Beltsville, MD 20705-2351

Visit the [SNAP-Ed Connection](#) for linkages to Other Resources

## Appendix G Notes about Educational Materials

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### General

State agencies should design SNAP-Ed materials to address the cultural, literacy, language, and income needs of the SNAP-Ed target audience.

State agencies should submit media messages and materials prior to their release to FNS Regional Office staff for review, 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 and related source codes, literature, or other products produced, in whole or in part, with SNAP funds for government purposes.

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

FNS encourages State agencies to submit their materials to the SNAP-Ed Connection for consideration and inclusion in the Resource Finder Database. Appendix F

**Non-discrimination Statement** - Materials developed or reprinted with SNAP-Ed funds shall include the following non-discrimination statement:

- **English:** The U.S. Department of Agriculture (USDA) prohibits discrimination in all of its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.)

Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write: USDA, Office of Adjudication, 1400 Independence Ave., SW, Washington, DC 20250-9410 or call (866) 632-9992 (Toll-free Customer Service), (800) 877-8339 (Local or Federal relay), (866) 377-8642 (Relay voice users). USDA is an equal opportunity provider and employer.

- **Spanish:** El Departamento de Agricultura de los EE.UU. (USDA) prohíbe discriminación en todos sus programas y actividades a base de raza, color, nacionalidad, edad, discapacidad, y donde aplicable, género, estado matrimonial, estado familiar, estado de los padres, religión, orientación sexual, creencias políticas, información genética, represalia, o porque el ingreso de alguna persona sea derivada totalmente o en parte de algun programa de asistencia pública. (No todas las bases prohibidas aplican a todos los programas.)

Personas con discapacidades quienes requieren medios alternativos de comunicación de información acerca de los programas (Braille, letra grande, cinta grabada, etc.) deben comunicarse con el Centro TARGET de USDA al (202) 720-2600 (voz y TDD). Para presentar una queja sobre discriminación, escriba a USDA, Office of Adjudication, 1400 Independence Avenue, SW, Washington DC 20250-9410 o llame gratis al (866) 632-9992 (número sin cargo de servicio a clientes), al (800) 877-8339 (llamada local or por medio del Servicio Federal de Relevó (Federal Relay Service), o al (866) 377-8642 (Servicio de Relevó). USDA es un proveedor y empleador que ofrece oportunidad igual para todos.

**Edits and size requirements** - Additions, edits, or deletions to the Civil Rights statement are not allowed. There are no print size requirements when the full Civil Rights statements are used. If the material is too small to permit the full statement to be included, the material at a minimum should include the following statement:

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

**Credit** - Should be provided to SNAP as a funding source on newly developed and reprinted materials. FNS recommend the following statements:

- **English:** “This material was funded by USDA's Supplemental Nutrition Assistance Program – SNAP.”
- **Spanish:** “Este material se desarrolló con fondos proporcionados por el Supplemental Nutrition Assistance Program (SNAP en inglés) del Departamento de Agricultura de los EE.UU. (USDA siglas en inglés).”

**Outreach** - A brief outreach message about SNAP should be provided on all newly developed or reprinted materials, including materials for television, radio, and other media. FNS recommends the following statement:

- **English:** “The Supplemental Nutrition Assistance Program (SNAP) 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 Supplemental Nutrition Assistance Program (SNAP en inglés) ofrece asistencia relacionada con la nutrición para gente con recursos limitados. Estos beneficios le pueden ayudar a comprar comida nutritiva para una mejor dieta. Para obtener más información, comuníquese con la oficina de servicios sociales de su condado.”