

Network PROGRAM LETTER TELECONFERENCE
Questions and Answers
May 24 & May 25, 2005 9:30 – 11 a.m.

Administration

1. Can you provide some examples of what you consider "administrative activities"? Obviously, clerical support, budget oversight, report-writing. What about preparation for Nutrition Education trainings, collection of local share data, providing technical support to staff implementing Nutrition Education? ***Administrative Time is the staff time spent performing administrative duties (e.g., processing purchase orders, preparing and processing subcontracts and memos of understanding, preparing invoices and local share documentation reports, collecting weekly time logs, and performing general clerical duties, such as answering phones, ordering supplies and preparing correspondence, etc.)***

Program Delivery Time is the time spent by program staff directly delivering, coordinating, or overseeing nutrition education services or programs (e.g., nutrition education in the classroom, food stamp promotion, food demonstrations, media campaigns, physical activity promotion, nutritional aspects of gardening, etc).

2. Under Staffing: does this apply to local share staff or just state share: must list percentage time spent on administrative and delivery of educational services? ***This applies to both local and state share. Please note, the requirement also includes fringe benefit costs. For the upcoming FFY, your Contract Manager will be taking this information from your Budget Justification and will submit the information for you on a consolidated spreadsheet to USDA. In future years, we may include a spreadsheet in our local share package for you to complete.***

Travel

3. Can travel expenses be reimbursed for employees who work less than full time? ***As long as the travel trip is for Network business or a Network sponsored training, the Network will pay 100% of a staff person's travel costs even if the staff person is not 100% FTE. If the individual is traveling to conferences that are not Network sponsored, but qualify as nutrition education conference or training, travel costs must be prorated based on FTE. (An example is the California School Nutrition Association meeting). Out of State travel is restricted. It requires pre-approval from your Program Manager. Only 4 staff from the entire state may travel to any national-level conference or out of state conference on Network (FSNE) funds (the restriction includes UCCE staff, and State and local Network staff). Examples of national-level conference which may be held in California would be American Dietetic Association, SNE and FNS. If there is out of state travel in your current year's contract, or travel to a national-level conference you must obtain prior approval from NETWORK for any trips after May 6, 2005. Let us know right away.***

4. For out of state travel, can approval be granted for upcoming conferences that were tentatively planned for the current fiscal year (2004-2005)? ***Yes, we will review all requests for out of state travel tentatively planned for the current year and approve/disapprove once we know the specifics. Remember, USDA has limited the number of attendees at the same conference to four. Please***

complete and submit the Out of State Travel Form attached to the Program Letter to your Program Manager.

5. Arrangements/obligations were made last contract year to participate in upcoming out-of-state Society for Nutrition Education and Behavior conference. ***As previously stated, there is a four person limit to all out of state conferences so prior approval is required. Please complete and submit the Out of State Travel Form to your Program Manager. Once we have all the requests we will prioritize the requests and let you know if you were approved or not.***

6. What is the process for reallocating funds that were disallowed for substitute teacher's time or out of state travel, etc...? ***The Network can approve the reallocation of disallowed costs. Please note that any reallocation of funds needs approval from both your Program and Contract Manager. If reallocation is approved, you will need to submit a Budget Adjustment request (BAR) with justification submitted to your Contract Manager. Remember that line item transfers are limited to \$25,000 or 10% of the annual agreement up to \$50,000, whichever is greater.***

Memo of Understanding (MOU)

7. Under what conditions are MOUs needed?

MOUs or Letter of Commitments are required in situations primarily where a partner organization is contributing local share to the Network contractor or there is an exchange of funds or service. It also could be required in situations where the partnering organization has responsibility in your Scope of Work that could impact your delivery on those activities.

There are three different scenarios that require an MOU:

- ***If an organization is contributing local share under your organizations' Network project.***
- ***If an organization is contributing resources like an intervention site, or staff resources (in-kind or state share).***
- ***If an organization is receiving State Share without a subcontract. NETWORK would prefer subcontracts be used instead of MOUs in this situation, but an MOU could be used to define the relationship between organizations.***

MOUs or Letters of Commitment are not needed when you have a subcontract or consultant agreement that defines the relationship between the two organizations.

MOUs should be submitted to Network staff as part of the local share and/or state share package. Please use the sample template MOU that was provided as part of the Program letter because this template has been approved by USDA.

An example of where a MOU is recommended: A Local Health Department conducts Network funded interventions in schools. The schools are providing the intervention sites but no funds are exchanged.

In this case, since the school is an intervention site it should have an MOU describing responsibilities of each partner.

8. Would current school district (PTA or Health Services) and county organization (i.e. Dairy Council, local public health agency) partners need to complete the MOUs? **Yes, an MOU would be needed.**

What if the county partner receives funding from the *Network* as well? **The same rationale would apply here; all contributing parties to *Network* interventions need MOUs in place.**

9. What level of collaborative activities require an MOU?? Please define "collaborative activities." **Activities that involve allocation of local share, exchange of funds or services (excluding subcontracts or consultant contracts).**

Substitute Teachers

10. Can you provide any insight into why the USDA does not cover the costs of substitute teachers' time while covering regular teachers attending *Network* trainings? **USDA wants assurance that the funds are for FSNE only and the expenditure of funds for substitute teachers does not meet this criteria.**

11. page 4 item # 10 Substitute teachers: What is the definition of a Network Teacher? **A Network teacher is a teacher who is conducting Network activities through an approved local incentive award contract and whose time is listed under "Personnel" on either the State Share or Local Share Budget Justification.**

Are substitute costs for regular classroom teachers (not supported by Network) allowable? **No. This also applies to other positions such as substitutes for food service staff.**

12. Does payment of stipends refer to teachers NOT funded by Network? **No. Stipends are only for Network teachers conducting activities or going to trainings outside of their contracted classroom time. The stipends should be reasonable, and at a district negotiated rate.**

13 (Substitutes doing nutrition education) We would like to double our effect by delivering professional development to the substitutes in our district by giving them professional development in nutrition education especially in Power Play materials. We would like to use the Nutrition Ed trained subs in classrooms when we take teachers out of the classrooms for training. If they are designated and trained as 'nutrition education ' substitutes, can we use them? **NETWORK raised the issue of having substitutes do nutrition education from an approved curriculum to USDA as a potential compromise to the issue and still USDA found paying for substitutes is unallowable.**

14. For changes regarding Substitute Teachers, the statement "Also, paying stipends to teachers for attending trainings outside of classroom hours is unallowable," will need clarification. Is this referring to substitute teachers only or "regular" teachers?

Stipends refers only to "regular" teachers. Compensating teaching staff for nutrition education trainings held during out of classroom hours is allowable. There appears to be confusion with the term "stipend" in that NETWORK staff interpreted it to mean reasonable "compensation" whereas USDA interpreted it to mean significant monetary amounts, something like

honorariums. Your agency should have district negotiated rates which are reasonable and necessary to continue to provide quality nutrition education.

15. Are teacher stipends for lead teachers still allowable? (A stipend to compensate for additional responsibilities to help manage the Network program at their particular school site) **Yes. Stipends are allowable for teachers that are handling the administrative/implementation requirements of the Network e.g. lead teachers or site nutrition liaisons. However, stipends need to be reasonable and necessary.**

16. The only changes I am concerned about is the one eliminating pay for substitutes or stipends for teachers attending nutrition education workshops or related events. Since we are required to attend SHAPE meetings and regional coalition meetings, this seems to be a mandate without funding. **Network Project Coordinators, not necessarily a cadre of classroom teachers should be able to attend SHAPE meeting and regional coalition meetings and report back to staff at the school district sites.**

17. We have spent all of this time on the SPARKS grant. Is a stipend considered an incentive payment to attend a class?

Incentive payments are not allowable.

In the allowable expenses under Physical Promotion it says trainings are allowable. Would the teacher stipend for attending a SPARKS training be a cost of training?

Yes. We can reimburse regular district "stipend" pay only if the training is held on a weekend or outside of regular school hours.

18. SPARK staff development training is a full day training. With some other restrictions our district has and getting around substitute pay, we may only be able to schedule 1/2 day trainings. Can we split the full day training into 2? They would still be one time demonstration, since the activities presented are different and not duplicated. **Dividing a physical activity demonstration into two-day session would be allowable in this case, provided that the activities presented at each of the trainings were not duplicated.**

19. Substitute pay questions: I already had programs scheduled through June 2 and understand these sub pay for the scheduled trainings will not be impacted. I have trainings scheduled for Sept, and have been informed that sub pay cannot be used. The trainings are SPARK staff development. a. If there will be funds that cannot be used for substitute pay which have been allocated in the contract, can it be used for other budgetary expenses? **USDA will allow contractors to reallocate funds that were disallowed for the substitute teacher time, but request that a brief description/justification be submitted to Network and WRO indicating how much funding is involved and in what manner the funds will be used.**

Please contact your Program and Contract Manager to discuss reallocation of funds from substitute teacher costs and any potential changes in Scope of Work.

20. Also, if allocating unused these funds, does it need to stay in the same budgetary categories? **Depending on whether or not you have used your line transfer capability for the year of \$25,000 or 10% of the annual agreement up to \$50,000, whichever is greater, you may or may not be able to do a BAR to reallocate the money to another area of your budget. Please work with your**

CM on your individual project. If substitute pay cannot be used, is it possible to pay teachers overtime for staying beyond their classroom day for trainings? **Yes.**

Prorating

21. If we are participating in a community health event (targeting a broader population than just eligibles), can we provide a nutrition education booth, distribute information, promote fruit & vegetable consumption, and have a food tasting/demonstration activity funded by *Network* funds? **Only if your organization can demonstrate that at least 50% of the participants meet the targeting requirements and are potentially food stamp eligible. If this cannot be demonstrated, costs associated with the event must be prorated to the % of the community that is at 130% FPL.**

22. Is it true that a county wide school event does not need to be prorated now if total county students are greater than 185% FPL? I have been required to do that in the past since "every student attending" was not below this level even though overall is greater than 65%. **Prorating is only required when more than 50% of those attending the event do not meet the potentially eligible criteria of 185% FPL. An event qualifies if 50% or more of the participants have gross incomes at or below the 185% of FPL. The NETWORK will apply for a waiver to USDA to target 185% of FPL for this type of venue/ activity and your organization will need to provide targeting information in the future.**

23. Would like clarification on the following issues: 1) Pro-rating expenses; **Prorating is required for activities if the activity/project cannot demonstrate that more than 50% of the participants are either food stamp participants, food stamp eligibles or potentially eligible. The definitions of food stamp participants, food stamp eligibles and food stamp potentially eligibles can be found in the Program letter.**

24. The program letter states that funding for social marketing campaign activities must be prorated to reflect the percentage of respondents at 130% FPL or less. How is social marketing campaign defined? **Appropriate Social Marketing campaigns with nutrition education messages targeted to Food Stamp eligibles that are delivered with an approved exclusivity waiver, in areas/venues where 50 percent of the persons have incomes equal to or less than 185% of poverty guidelines or thresholds are allowable without prorating. The change in Guidance only applies to campaigns that cannot demonstrate targeting. USDA defines social marketing differently than the NETWORK. The NETWORK thinks of social marketing as a multi-channel, multi-level campaign. With that said, our interpretation of this change to the Guidance is that USDA is referring to media and public relations campaigns only at the local level.**

25. What are examples of activities that need to be prorated? **Expending Network funds for T.V., radio, print and outdoor advertisement placements would be activities that may be challenging to demonstrate targeting to food stamp eligibles and are now restricted to 130% of FPL since messages can be considered reaching the general population. Targeting for outdoor advertising such as billboards and bus backs would not be as challenging to**

prove as T.V. or radio, organizations can target outdoor with census tract data and utilize the Network GIS system. For local programs, it may be very challenging providing the targeting data from T.V. and some radio purchase/placement although there are some stations that can be found.

With all media development, coordination and approval from your Program Manager is required prior to production or placement.

26. Under the Allowable and Unallowable costs, (1st paragraph, pg 2 of 13), it identifies activities targeting school districts, over 50% of the students must be enrolled in the free/reduced meal program. Yet, in the program letter, item #3, Pro-rating: Local projects must pro-rate expenses for any activity they wish to conduct in which less than 50 % of the target audience meets the 185% of FPL. Am I understanding this correctly, that a school with 42% of students on FRPM could receive *Network* activities if pro-rated? ***Yes, prorating of less than 50% of students enrolled in free/reduced meal program is something that could be approved by USDA. However, due to the current Nutrition Network Smart Growth Policy, we will continue to only approve the 50% or more FRPM targeting in Federal Fiscal Year (FFY) 2006. This option will be considered for FFY 2007.***

Materials

27. Some of the handouts we use are provided to us by other entities (American Dietetics Association, American Heart Association, WIC). There is no Food Stamp Program statement on them... should we add that? ***No, this is not required since the Network did not produce the materials. However, the Network will not pay for or promote materials that are clearly focused on clinical conditions such as high blood cholesterol, diabetes, etc.***

28. May we distribute nutrition education literature that was paid for by another Federal source (WIC) but provided to us free of charge? ***Yes; you may also continue distributing nutrition education materials from agencies such as American Cancer Society, National Cancer Institute, Dairy Council of California, etc. You do not need to add Network logos or USDA attribution to these types of materials as USDA did not pay for development of these materials.***

29. If we take information from reputable nutrition education sources (USDA, American Dietetic Association, etc) to include in a newsletter for staff, is that viewed as a "newly developed material" which requires approval? ***Yes the newsletter will still need to be reviewed and approved by the Network. Many contractors reword information from reputable nutrition education sources and another review is usually helpful. We also ask that you provide us with adequate time for review, 5 working days.***

30. Do we need to have each of the handouts previously approved resubmitted each year for approval? ***No, not if the content is staying the same.***

31. Some of the Nutrition Education Reinforcement Items do not have a nutrition education message printed on them because of the size or material (measuring spoons, apple corers)... each meets the *\$4/participant requirement.... can we

continue to purchase/distribute these items? **Yes. It is preferred that Nutrition Education Reinforcement Items contain a nutrition education message but in some instances, this is not possible and only a 5 a day logo can be used. NETWORK encourages projects to take advantage of the free NERI resources available through their 1-888-EAT-FIVE hotline.**

32. Does the Food Stamp message have to appear on every worksheet of our curriculum, or could it just be on one page such as the Quiz or the Journal entry? **No, the food stamp message does not have to appear on every worksheet of a curriculum. Food Stamp attribution can be placed on the back cover or inside cover along with logos, and other required acknowledgements.**

33. Will the 5 a day Power Play! curriculum for elementary schools change due to the changes in the USDA Dietary Guidelines? **The 5 a Day Power Play! curriculum will be changing in the future due to the changes in the USDA Dietary Guidelines and the introduction of "My Pyramid". National 5 A Day is in the process of reviewing the new Guidelines and potentially developing new branding around the new Guidelines. Messaging for Power Play! will include the recommendation of 3 1/2 - 5 cups of fruits and vegetables and at least 60 minutes of physical activity a day for better health. We will be issuing further clarification on Dietary Guideline and messaging within the next few months once information is available.**

34. If the Power Play! curriculum does change, when will it be available for our use? **The Power Play! curriculum is in the process of being changed and should be due out before the end of the year. (9/30/2005). We will keep you posted. Many other Network and 5 a Day materials are in the process of being adapted. In the interim, please use existing curriculum and materials until the updated materials are available.**

35. If the Power Play! materials are not ready until after Sept. '05 what do we do in the meantime knowing that we are Network funded? **USDA is aware of many of the challenges that the Network is facing attempting to integrate the new Dietary Guidelines into an existing program as large as the Nutrition Network. Power Play! staff are making every effort to meet the deadline of 9/30/2005.**

36. What do we write into our Power Play! grant for curriculum replacement and materials updates? **For the new curriculum, updated materials will be available from the State for Power Play! Lead Agency use once developed and should not affect your budgets. For other materials that you may need to update, we encourage you to work with your Program Managers and get prior approval before printing any new materials to ensure you have incorporated the new requirements.**

37. Can we continue to purchase and use the fat/sugar/salt tubes and displays that identify the fat/sugar/salt content of specific foods available from Fast Food restaurants? (ie. the fat content in a Big Mac from McDonalds) We use these items as part of a nutrition education sessions promoting fruits and vegetables... if needed we could avoid using the brand name of the item or the restaurant where the item could be purchased. **Yes, this nutrition education approach is appropriate. It would be best not to single out any one fast food vendor or food type in this**

intervention. It would be better to have the actual nutrition labels from the fast food vendor which are public information.

38. Do we need to take off the statements providing information on the availability of the School Meals program, Summer Feeding program, and WIC from the handouts for teachers/parents that also provide information on the Food Stamp Program? These handouts are provided as part of the packet of information given to teacher and parent participants of nutrition education sessions. **No. We are allowed to promote these programs.**

Other

39. I have just attended a food stamp workshop put on by Social Services in our County. I would like to know from USDA and the Food Stamp Nutrition Education Program, why you can purchase plants and seeds with your food stamps as an individual, but plants and seeds are unallowables for the USDA Food Stamp Nutrition Program. Both are funded by the same organization and there seems to be a gap in this logic. **We share your frustration with differences in allowability for different USDA programs. USDA has 15 nutrition assistance programs that it administers and the rules are not necessarily the same for all programs for a variety of different reasons. The USDA FSNE clearly defines purchase of plants and seeds as an unallowable expense with Network funding.**

40. I am concerned that we can no longer promote the national school breakfast and lunch programs. This has definitely been a part of our program in the past and we are always trying to get all eligibles qualified. Also, the free and reduced lunch count is the way we determine if we qualify for nutrition network funding or not, so promoting it makes sense. I heard that if we promote it, we would have to do nutrition education. What would that look like? **For this funding, you cannot have a separate goal and objective on increasing School Breakfast or School Lunch participation or do outreach for another nutrition assistance program funded by USDA. Nutrition education should be the focus of your objectives and activities. You may still promote the National School Breakfast and Lunch programs as a side component to nutrition education activities. The main focus of meetings or activities cannot be promoting the school meal programs. An allowable promotional activity would be distributing literature regarding these programs (food stamp program, school lunch, and school breakfast) during a school nutrition education event such as a Back to School/ Parent Night, school health fair, etc... Also, at your nutrition education booths have your booth workers educate clients on these school meal programs in conjunction with their nutrition education messages.**

41. Please clarify if it is allowable to promote but not outreach or recruit for the other federal programs such as the school Breakfast and Lunch programs. **Yes, promotion is allowable.**

42. Must we delete the sentence from our Scope of Work which says we will promote these federal programs? **No, but know what is allowable in terms of promotion.**

43. Page 4, #11 Promotion vs. Outreach: What is the difference between promotion and outreach in relationship to NSLP (National School Lunch Program) at school district LIAs? **USDA defines promotion as delivering a message that provides**

information on the availability, benefits, and application procedures for the (NSLP). Promotion must also be conducted in the context of nutrition education. Outreach is defined as any activity or set of activities in which the primary objective is to increase participation in the NSLP through individual applicant assistance, community-based outreach message dissemination, or facilitation of systemic changes in that enhance program accessibility.

Examples of Outreach would be pre-screening or assisting individuals with completing NSLP applications and obtaining verification; Conducting outreach workshops for members of community organizations that serve low-income people; Convening meetings that focus exclusively or primarily on NSLP Outreach and increasing NSLP participation. Implementing environmental or systematic changes and strategies, in which the primary objective is to increase participation in a non-FSP program. All these examples are unallowable.

Example of promotion would be educating food stamp eligibles on the benefits of the NSLP in the context of a nutrition education intervention.

44. If promotion is OK, does that include going to School District meetings where we discuss ideas to promote the school breakfast and lunch programs? **Yes, provided that the agenda is not solely about increasing participation in school meal programs but includes information about nutrition education efforts.**

45. Are we prohibited from participating in discussions about "environmental or systemic changes and strategies, in which the primary objective is to increase participation in a non-FSP program" or are we only prohibited from the costs of implementing them? **No. Please make sure the agenda reflects nutrition education activities.**

46. How USDA can change the rules in the middle of the game, don't we have at least till Sept. 30th to complete the contract? **Unfortunately, those items that took affect immediately were in USDA 2004-2005 Guidance. The reason that they came to our attention now, is that USDA reviewed many of our local projects budgets and budgets justifications that they haven't reviewed in the past and found issues with activities such as out of state travel and substitute teachers. Cancer Prevention and Nutrition Section (NETWORK) is given the responsibility to interpret the Guidance. In these cases, we did not interpret them the same way as USDA did. NETWORK made numerous requests to have these changes delayed until the start of 2005 -2006, however these requests were denied. We are very sorry for the inconvenience.**

47. We use food labels from a variety of name brand products in our label reading nutrition education trainings. Can we continue to use them? We are not promoting the use of any of the products but use them to show participants how products are available in lower fat/salt/sugar content and how the products may be lacking in the nutrients found in f/v (vitamins, minerals, fiber, etc.) **Yes, please continue this type of consumer education.**

48. Given the Target Population as defined, what about the Collaboratives' work which is targeted mostly to policymakers at many levels?

The target population of the Regional Collaboratives work is still the same – food stamp participants and similar low income populations.

Collaboratives are also charged with increasing communications and coordination between regional programs, Network and non-Network funded, reaching food stamp program participants and similar low income populations so that direct service opportunities can be enhanced through sharing of resources and experiences.

The Regional Collaboratives are charged with implementing advocacy initiatives that will lead to policy, systems and/or environmental changes to increase the access and availability of fruits and vegetables, PA and nutrition assistance programs for food stamp participants and similar low-income consumers. Working through intermediaries (e.g., policymakers, community agency partners, etc.), the Collaboratives' initiatives will be focused on improving low-income neighborhoods and communities to support the individual behavior changes of where food stamp participants and similar low-income populations live, work and shop. With the technical assistance of Network staff, allowable policy education, media, food stamp promotion, physical activity promotion, needs assessment, and training strategies will be utilized.

49. Food Demonstrations section 2, page 2-Please clarify display and demonstrate regarding the allowable cost of equipment or dishes for display of food prepared for demonstration purposes and the non-allowable food/fruit for display purposes. ***Allowable costs for food demonstrations include kitchen equipment and dishes for food storage, preparation, and display of food to be used for demonstration. Prorating is necessary if other programs also use the equipment and dishes. If food is only to be displayed, and not used for taste testing or demonstration, any costs for display are not allowable.***

50. Is it OK to demonstrate but not ok to display food/fruit? Is plastic food/fruit to display for a table at a school event OK but not real fruit? ***Plastic food or fruit would be appropriate for display purposes.***

51. Re Physical Activity Promotion, Section 11, page 10-- How can we participate in and promote a Walk to School Day event under these guidelines? Is it OK to plan, promote and participate, if we have a healthy eating display and all items and NERI displayed are promoting nutrition, like 5 a day? ***Per the USDA, the 2005 guidelines (A.13-Cost Policy, p. 63) embrace the maintenance of health weight and improved fitness level. The inclusion of physical activity promotion as part of FSNE is an allowable expense. All programming must include a focus on healthy eating behaviors and can include physical activity promotion. Network-funded schools are encouraged to promote Walk to School Day events and should incorporate nutrition related events and NERI items. (e.g., 5aDay displays and events).***

52. Do we need to change the wording on our goal of "increase participation in Food Assistance Programs" to "increase participation in Food Stamps"? ***We recommend***

rewording your goal to “promoting food assistance programs”(or nutrition assistance programs).

Questions received after the first teleconference:

53. What is the process to apply for a waiver with the USDA regarding payment of substitutes to cover teachers for nutrition education trainings? Fiscally there is almost no difference in paying a substitute teacher and paying a stipend to a classroom teacher (for after school or weekend trainings).

Unfortunately, there is no waiver available to apply for substitute teacher costs. We brought this issue up numerous times with USDA and were told it was unallowable.

54. We just finished up the teleconference and are still a bit unclear about the “potentially eligible” issue for our local share ending 9/30/05. Can you try to clarify this in terms of our program and how it effects us?

The term “potentially eligible” is a new term used by USDA in the 2006 Guidance. It is used in the context of delivering services to generally low-income persons at a site where at least 50% of persons have gross incomes at or below 185% FPL. Delivering services at these sites has a fair likelihood of benefiting food stamp eligibles, who have incomes at or below 130% FPL. CPNS will be submitting a waiver to USDA based on individual contractor intervention site income targeting data to allow Network contractors to include “potentially eligible” persons to participate in Network activities. Please contact your Program Manager for clarification regarding your specific program.

55. I am still confused about what we need to submit when we conduct our media outreach through TV, radio and newspaper print. Do we need to ask the media agencies for written confirmation of the estimated percent of target audience at or below 130% FPL to be reached by the PSA, article or interview? ***We are***

interpreting this Guidance to apply to paid media not PSAs because there is no cost for placement of the PSAs. You would need to get estimated reach and frequency information from the stations for paid radio, and T.V. Unless census tract data could be used to prove targeting for the print, you would need to prorate at the 130% of FPL.

56. In the past we have asked media agencies to give us estimated numbers of low-income (at or below 180% FPL) seniors to be reached with each media release and then reported those numbers to the Network. Today I heard that “pro-rating” might be required and that seems tedious. Can we simply ask the media agents to estimate the number of low income senior contacts at 130% FPL to be reached with our media runs – and then report those number to the Network? Or are we required to provide evidence that media runs will reach an audience with at least 50% being at or below 130% FPL? ***If you are purchasing media, your organization would have to actually provide evidence that the media placements reached the target audience with at least 50% being at or below the 130% FPL. This would not be challenging for billboards, and other forms of outdoor advertisements. For T.V. and radio, this might be challenging. Please work with your Program Manager.***