

Supplemental Nutrition Assistance Program Education Guidance



Nutrition Education and Obesity Prevention Grant Program

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SNAP-Ed Guidance

Nutrition Education and Obesity Prevention Grant Program

Introduction

This Fiscal Year (FY) 2014 SNAP-Ed Guidance provides instructions for development and submission of State nutrition education and obesity prevention grant program plans (SNAP-Ed Plans). The Guidance includes provisions called for by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (Public Law 111-296) Section 241, signed December 13, 2010. The Act amended the Food and Nutrition Act (FNA) of 2008, Section 28 establishing a Nutrition Education and Obesity Prevention Grant Program and re-structuring SNAP-Ed.

SNAP-Ed Guidance was redesigned in FY 2013 to address the programmatic changes necessary with implementation of provisions from the FNA and to make the Guidance more user-friendly. The FY 2014 SNAP-Ed Guidance remains primarily the same as the FY 2013 Guidance. Some sections have been enhanced to provide additional instructions and in some places new information has been added. Sections with significant revision are highlighted to assist users in identifying the changes. Additional minor edits throughout the Guidance have been made to assure consistency and to correct insignificant editorial and grammatical inaccuracies. Significant topical areas and activities that are State requirements or are strongly encouraged are set in bold type to facilitate identification.

The method for determining State SNAP-Ed allocations changes significantly for FY 2014. The funding for FY 2014 and thereafter is 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. Estimated FY 2014 State allocations to assist States in preparing their 2014 Plan budgets are attached to the transmittal letter accompanying this Guidance.

Relative to the enhanced emphasis on obesity prevention called for in the HHFKA and to help States identify evidenced-based policy and environmental change interventions, the Food and Nutrition Service (FNS) has engaged the National Collaborative on Childhood Obesity Research (NCCOR) to help develop an intervention toolkit. The toolkit contains strategies and interventions that are being used successfully to address obesity in communities across the nation that may be useful in SNAP-Ed. More information about the toolkit is found in Guiding Principle #2 of the Guidance Overview Section and on the SNAP-Ed Connection: <http://snap.nal.usda.gov>.

The FY 2014 SNAP-Ed Guidance supersedes previous Guidance. It provides instructions to States to implement all provisions of the FNA, Section 28. The Guidance and updated fillable templates are available in pdf format on the SNAP-Ed Connection.

SNAP-Ed Guidance

Overview

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

The SNAP-Education requirements mandated by the FNA, Section 28 complement and address the Food and Nutrition Service (FNS) mission and the goal and focus of SNAP-Education. 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-Education Goal and Focus

The SNAP-Education 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-Education is:

- Health promotion to help **the SNAP-Education target audience¹** establish healthy eating habits and a physically active lifestyle; and,
- Primary prevention of diseases to help the SNAP target audience who have risk factors for nutrition-related chronic disease prevent or postpone the onset of disease by establishing healthier eating habits and being more physically active.

SNAP-Education 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-Education.

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

FNS also has a series of complimentary messages available that address some of the key food groups. The messages and related resources address motivational mediators and intervening factors that are relevant to low-income moms and children. These tested resources can be used in educational resources to help low-income audiences take action to put the *Dietary Guidelines for Americans* into practice. The resources are available at <http://www.fns.usda.gov/fns/corenutritionmessages/default.htm>.

As SNAP-Education nutrition education and obesity prevention activities and interventions are grounded in the *Dietary Guidelines for Americans*, States may base their project messaging and activities on any or all of the *Dietary Guidelines for Americans* recommendations or messages, including promoting foods and nutrients to increase as well as foods and food

¹ The Agency has determined that the population eligible for SNAP-Education is SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance (Guiding Principle 1.).

components to reduce. However, FNS has determined that States may not use SNAP-Education funds to convey negative written, visual, or verbal expressions about any specific brand of food, beverage, or commodity. Such messaging about specific brands are not acceptable parts of a SNAP-Education Plan.

SNAP-Education Key Behavioral Outcomes

FNS encourages States to focus their efforts on the following behavioral outcomes in order to magnify the impact of SNAP-Education:

- 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-Education. The primary emphasis of these efforts should remain on assisting the SNAP-Education 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 updated the definition of nutrition education that States must use to align with SNAP-Education under the HHSFKA. The definition considers the FNS mission.

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 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.²

Another provision of the FNA requires that allowable activities in the redesigned SNAP-Education 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

² Adapted from definition by Isobel R. Contento, PhD in *Nutrition Education, Linking Research, Theory, and Practice*, Jones and Bartlett Publishers, 2011

effectiveness of a wide range of approaches. **The following defines an evidence-based approach that is 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 (Relevant key recommendations are included in Chapters 2-5 and Appendices 1 and 2 of the Dietary Guidelines for Americans 2010). 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.

Approaches

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

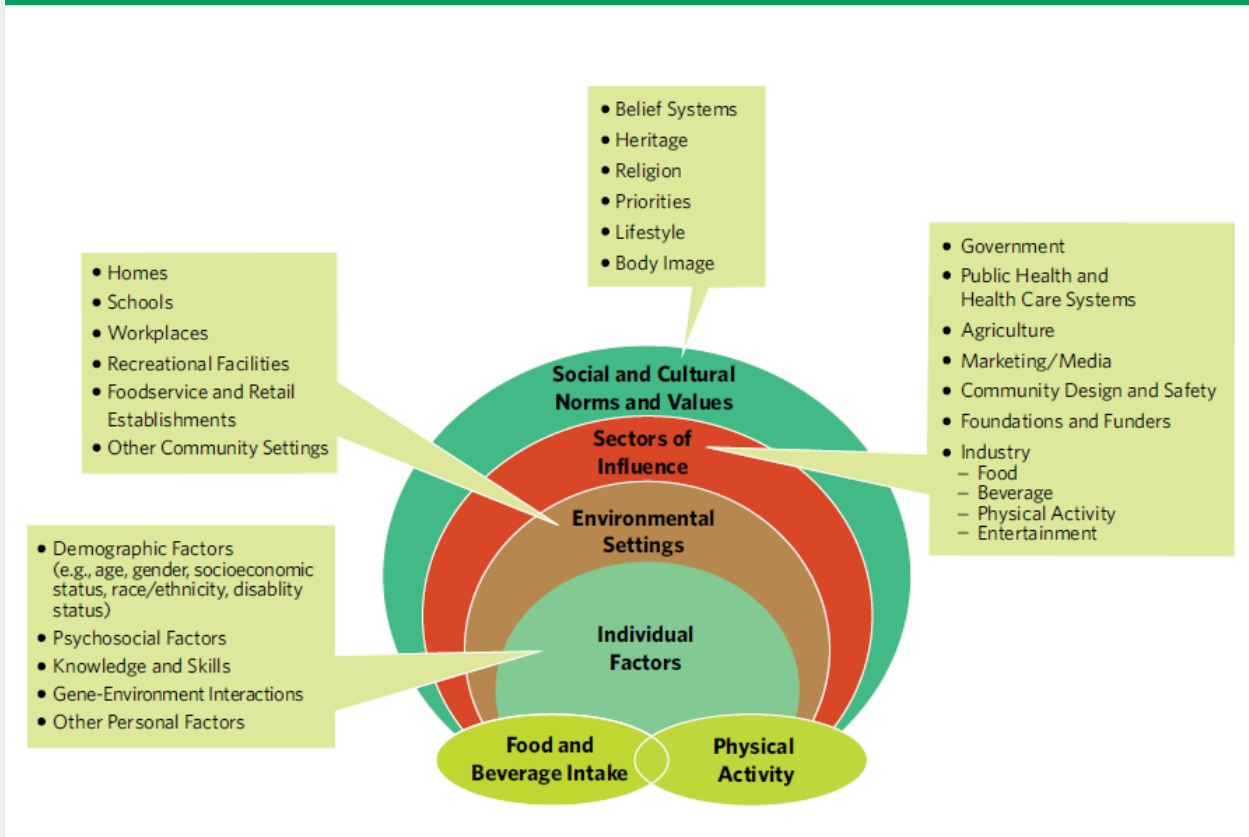
1. Individual or group-based nutrition education, health promotion, and intervention strategies;
2. Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels; and
3. Community and public health approaches to improve nutrition

The 2010 *Dietary Guidelines for Americans*, Chapter 6, states that a coordinated system-wide approach is needed to reverse the current national environment that promotes caloric overconsumption and discourages physical activity, along with individual choices within that environment that have contributed to dramatic increases in the rates of overweight and obesity. The *Dietary Guidelines for Americans* 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 for Americans, Chapter 6*](#) for detailed information on the *Dietary Guidelines for Americans Socio-ecological Framework for Nutrition and Physical Activity Decisions* depicted below. **SNAP agencies should use a comprehensive approach in SNAP-Ed that addresses multiple levels of this framework to reach the SNAP-Ed target population in ways that are relevant and motivational to them, while addressing constraining**

environmental and/or social factors. Working with partners to achieve this aim could further SNAP-Ed’s collaborative efforts, reduce duplication of effort, and align SNAP-Ed’s strategies 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 the Three Approaches Cited in the FNA

1. 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 for Americans* 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 and beverages with added sugar

- Conducting individual or group educational sessions on calorie balance and weight management based on the *Dietary Guidelines for Americans*. This could include measuring height and weight 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
- Distributing a family-oriented newsletter that includes child/parent activities, recipes, etc.

2. Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels

These approaches may address several or all elements 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 the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) to promote and support breastfeeding activities

3. 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 but are not limited to:

- 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 and to make changes related to the physical activity environment to facilitate the adoption of healthier nutrition and physical activity behaviors in low-income areas
- Providing consultation to SNAP authorized retailers on stocking healthier food options
- Facilitating the reporting of statewide surveillance and survey data on nutrition indicators among the SNAP-eligible population
- Providing interventions at settings such as schools, child care, worksites, community centers, places of worship, community gardens, farmers markets, food retail venues, or other settings with a low-income population of 50 percent or greater
- Conducting social marketing campaigns

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; 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 food and nutrition focus of 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 activities 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 and Child Nutrition Programs. States are now required to**

describe their coordination efforts in their SNAP-Education Plans following the instructions contained in Section 2, *The SNAP-Education 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 provides the capacity for SNAP-Education to meet its goal and remain consistent with the FNS mission, while reaching low-income families and individuals through multiple spheres of the SEM. Since SNAP-Education funds are capped, States may be able to leverage SNAP-Education financial resources with those 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 when funds are involved must be available for inspection upon request.**

SNAP-Education 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 for Americans* 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 for Americans 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.

The six SNAP-Education Guiding Principles are as follows.

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 who 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-Ed 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-Ed.

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 is SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance.** 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 but are not limited to 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 percent of persons have household incomes of < 185 percent 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*.

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 for Americans Socio-ecological Framework*.

Interactive groups, one-on-one instruction, and social marketing campaigns are among the approaches used to deliver nutrition education to the SNAP-Ed audience. **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 of a large number of people in the target audience.** Social marketing may be an important component of some SNAP-Ed interventions and may target 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 be directed to the low-income SNAP-Ed target 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.**

Interventions Toolkit: To help States identify evidenced-based obesity prevention policy and environmental change interventions, FNS has developed an intervention toolkit. *SNAP-Ed Interventions: A Toolkit for States* is a package of off-the-shelf options that can be readily adopted by SNAP-Ed State agencies and providers and are highly likely to produce positive outcomes. The toolkit provides existing, proven effective and actionable tools that embody community-based and public health approaches to nutrition education and obesity prevention, consistent with the context and policies of SNAP.

In developing the toolkit, FNS sought to include interventions best suited for SNAP-Ed, namely those that are proven effective, are consistent with SNAP-Ed policy and practice, and are suitable for the low-income population. The interventions included in the toolkit are drawn from the extensive public health research base, existing interventions, and other resources developed by CDC and others. FNS engaged NCCOR in its development to help ensure the selection of evidence-based interventions.

The toolkit is not an exhaustive compilation of potential strategies and interventions that are appropriate for SNAP-Ed. Rather, FNS is offering the toolkit as a starting point for ideas that States may use to further their obesity prevention efforts through SNAP-Ed. FNS sees the toolkit as a dynamic resource that will have supplementary content added to it as more evidence-based strategies and interventions that are appropriate for use with the low-income SNAP population are identified. States are encouraged to engage partners as they embark on expanding their nutrition education and obesity prevention activities. States are advised that these, as with other strategies and interventions States include in their SNAP-Ed Plans, are subject to Regional Office approval. The toolkit can be found on the SNAP-Ed Connection at [SNAP-Ed Connection](#).

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

To maximize 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 within the broader SNAP-Ed target 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. A survey by the American Dietetic Association Foundation reports on the key role mothers have as models for their children's eating habits.³ Parents point out that children and teenage youth affect family grocery and meal choices.⁴ Together, mothers and their children make or influence food purchases and meal decisions.

Targeting SNAP-Ed to women and children captures a majority of SNAP recipients. In FY 2011, 19 percent of SNAP participants, or almost 8 million, were women living in households with children. An additional 45 percent of participants were children⁵.

Targeting these two groups is also 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 percent) and almost 17 percent 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.”⁶

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

⁴ 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.

⁵ U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2011*, by Mark Strayer, Esa Eslami, and Joshua Leftin. Project Officer, Jenny Genser. Alexandria, VA: 2012

⁶ *Nutrition Insight* 43, U.S. Department of Agriculture, Center for Nutrition Policy and Promotion, April 2009

FNS recognizes that programs such as WIC, the **Child and Adult Food Care Program (CACFP)**, and the Expanded Food and Nutrition Education Program (EFNEP), also target women and 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 interventions will duplicate this national focus. Furthermore, SNAP-Ed activities for children, that include related parental activities, hold greater promise of success because they reinforce messages in the home setting.

FNS' national focus on women and 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 and/or environmental or policy-level interventions.

Evidence-based interventions based on the best available information 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;
 - Motivators and reinforcements that are personally relevant to the target audience;
 - Multiple channels of communication to convey messages;
 - Approaches that provide for active personal engagement; and
 - Intensity/duration that provide 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. FNS defines practice-based evidence as 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 results 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.

To magnify the impact of SNAP-Ed, **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* that consider the FNS mission and the goal and focus of SNAP-Ed may be considered for approval.

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 role 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 percent 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.

Consults with the Director of the CDC and outside experts and stakeholders.

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-Ed 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 and 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.

May coordinate and collaborate with other State nutrition education and obesity prevention programs, especially those recognized by or receiving support from CDC.

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

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.

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.

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.

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.

May coordinate and collaborate with other local nutrition education and obesity prevention programs, especially those recognized by or receiving support from USDA and CDC.

Collects and reports data to the State SNAP agency regarding participation in SNAP-Ed and characteristics of those served.

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

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

SNAP-Ed Guidance

SNAP-Ed Plan Process

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

State Agency Liability:

For SNAP: State SNAP agencies must submit a plan for activities requiring prior approval, which includes the SNAP-Ed Plan, annually by August 15. 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 request. 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-Ed: The State SNAP agency is accountable for the contents and implementation of its approved SNAP-Ed Plan. It is responsible for making allowable cost determinations and monitoring to ensure that SNAP-Ed 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-Ed goals and objectives and to clarify which expenses are eligible for reimbursement through SNAP.

SNAP-Ed Plan Requirements

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

- Conform to standards established in regulations, SNAP-Ed Plan Guidance, and other FNS policy. A State agency may propose to implement an annual or multiyear Plan of up to 3 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-Ed activities in local communities.
- Describe the SNAP-Ed 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 that 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 **and physical activity** 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 year for an annual Plan and for all years of multi-year Plans.
- 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 **and obesity prevention** goals are being met.
- Submit a SNAP-Ed Annual Report to FNS by November 30 of each year. The report must describe SNAP-Ed Plan project activities and budget for the prior year.

SNAP-Ed Plan and Annual Report Submission and Approval Process

Timeline

April 1-August 15	Plan submission period for the coming fiscal year
May 1	Last date for receipt of Plan Amendments for current year
August 15	Due date for receipt of annual Plans or updates to multiyear Plans for the coming fiscal year
October 1	Approval date or Regional Office response to States on Plan
November 30	Due date for Annual Report for previous fiscal year
December 31	Due date for submission of EARS data through FPRS online system

The State agency should follow these instructions in submitting its Plan and Annual Report:

- 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.
- **Concisely** describe activities considering the scope of projects and limit the length of the Plan.
- 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. Use at least a 12-point font, 1-inch margins and number pages consecutively.
- 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.
- 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 due date.
- Submit Plan Amendments for current year with new/significantly revised activities to the FNS Regional Office by May 1.
- Concisely describe the outcomes of projects and submit the previous year's annual report to the FNS Regional Office by the November 30 due date.
- Complete the Education and Administration Reporting Form (EARS) Form #759, OMB No. 0584-0542, by December 31.

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.

Annual or Multiyear Plans

States may submit an annual or multiyear Plan. Multi-year Plans may cover a 2- or 3-year period. **A multiyear Plan must demonstrate the flow of program activities in a logical and sequential manner with each year building upon the preceding year.**

In developing an annual or multi-year SNAP-Ed Plan, States should consider using the recommended Plan templates located in the appendices to guide the process, helping to ensure that all requested information is concise and accurate. The templates are now fillable forms which should assist in the preparation of Plans and their subsequent review and approval.

To determine whether to approve a State's multiyear Plan, FNS will consider a State agency's: inclusion of a limited number of clear, concise, and well-written goals and objectives; a

record of fiscal and program integrity; demonstration of a high degree of program stability resulting from experienced staff, consistent and reliable partners, and prior demonstration of proven projects; and projections that the State's estimated future funding indicate the ability to support program activities over the course of a multiyear Plan.

States may be limited to a 1-year Plan if they are experiencing ongoing problems. State requests to submit a multiyear Plan may not be approved until problems are resolved as determined by the Regional Office. **FNS encourages State agencies to seek Regional Office technical assistance regarding the SNAP-Ed Plan development and submission process and should do so early when considering preparing multiyear Plans.**

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 or other means-tested Federal assistance program benefits. **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, residents of nursing homes, 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 percent of persons have gross incomes at or below 185 percent of poverty guidelines/thresholds. This would include, for example, persons residing or schools located in census tract areas or other defined areas where at least 50 percent of persons have gross incomes that are equal to or less than 185 percent of the poverty threshold or children in schools where at least 50 percent 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 percent of persons have gross incomes that are equal to or less than 185 percent of the poverty threshold. **States may submit proposals to their respective Regional Office with alternate methods for defining grocery stores that serve the low-income target population as potentially eligible for SNAP-Education activities. For example, in rural areas a particular store may not redeem a monthly average of \$50,000 in SNAP-benefits but may be serving the majority of the SNAP low-income population or be the only grocery outlet in the community for the entire population, including the low-income population.**

Describing the Target Audience

Section A of the Plan should describe the SNAP-Education 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-Education 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's target audiences. Examples of population characteristics and demographic data that may help in planning and delivering SNAP-Ed effectively include: geographic location, i.e., areas and neighborhoods where the SNAP-Ed 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 data may be found under Geographies at American FactFinder \(http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t\).](http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t)

Current and projected obesity rates for the State or target population may also be considered. Cite sources used to obtain data such as a Federal governmental agency data set or other recognized authoritative source. One source is the *F as in Fat* report (<http://www.healthymamericans.org/report/100/>) and in particular its state-by-state data on that Web page and at (http://www.healthymamericans.org/assets/files/TFAHSept2012_ALL_ObesityBriefs.pdf) which may be helpful to States in developing their Plans.

States may propose targeting methodologies and alternate data sources to identify their target audience.

A needs assessment will help target SNAP-Ed effectively. FNS recommends that States maximize the SNAP-Ed 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 as stated in the Guiding Principles. *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, social and cultural values and norms, and where and how the SNAP-Ed population eats, engages in physical activity, redeems SNAP benefits, lives, learns, works, and plays.
- 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-Ed 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-Ed 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. **FNS encourages States to select a maximum of three to four behaviorally-focused, measurable objectives for each year.** A well-written and clearly defined SMART 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.

Objectives should include a behavioral focus as well as related process objectives. An example of a State-level process objective: *By the end of the fiscal year, the State agency will have established collaborative relationships with four food banks to increase access to healthier food choices at their facilities for the SNAP-Ed target population.*

State goals and objectives should be linked conceptually to the project or local level objectives described in the next section. An explanation of how the results of 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 report that they have tasted at least one new vegetable grown in their school's 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, Center for Nutrition Policy and Promotion (CNPP), or other Federal governmental agency developed or recommended 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. Evaluations should focus on specific current SNAP-Ed interventions or initiatives, particularly in light of the nature of SNAP-Ed funding. Evaluation of other than SNAP-Ed interventions or initiatives is considered research and therefore will not be approved for funding. Those interested in broad research may wish to seek alternate sources of funding. For example, requests to fund the creation or validation of an evaluation tool would not be approved;
- 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; and

FNS encourages States to publish and disseminate findings from their evaluation of SNAP-Ed projects so that other States with SNAP-Ed initiatives may benefit. However, FNS views publication of a journal article as a value added activity for project management. Rather than using SNAP-Ed funds, the Agency recommends that this activity be covered through overhead costs which are supported by indirect costs.

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

- Formative - can involve pre-testing of draft 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-Ed 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

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;
- Whether or not the project has been evaluated previously, along with the most recent year in which the evaluation was done; and
- 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

- *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

- *WIC Evaluation Resource Guide*

www.fns.usda.gov/ora/MENU/Published/WIC/FILES/WICEvaluationResourceGuide.pdf

- **Appendix H Evaluation and Related Resources**

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

For SNAP-Ed projects delivered in coordination with another agency, a written agreement such as a Memorandum of Understanding (MOU) that outlines the responsibilities of all the State agencies involved in the collaboration should be kept on file. Written

agreements are required for all collaborations that involve any type of financial or budget management issues. **States may maintain written agreements in electronic format.** The agreement should list the location and the contact information for the responsible person(s) for each project implemented at the local level. A separate agreement for each local level project implemented under it is not necessary. The State-level agreement is signed by all the State agencies involved. Examples where an agreement 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 agreement 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-Ed 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-Ed 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-Ed Plan should include the following assurances, that:

1. The State SNAP agency is accountable for the content of the State SNAP-Ed 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-Ed to the SNAP-Ed 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-Ed grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional SNAP-Ed targeted individuals. In no case may activities funded under the EFNEP grant be included in the budget for SNAP-Ed.
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 Office of Management and Budget (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 and obesity prevention 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-Ed objectives and goals.
8. All materials developed or printed with SNAP-Ed funds include the appropriate USDA non-discrimination statement, credit SNAP as a funding source, and a brief message about how SNAP can help assure a healthier diet and how to apply for SNAP benefits.

Section F: Signatures Appendix A, Template 6

The SNAP-Ed 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.

Sample Multi-Year Planning Guide for a Three-Year Plan

Template Name	Year Completed			Submission Details
	Year 1	Year 2	Year 3	
Template 2. Section A. Identifying and Understanding the Target Audience	✓			Completed with the initial SNAP-Ed Plan submission.
Template 2. Section B. Part 1.a. State Level SNAP-Ed Goals	✓			Use consistent goals for the 3-year Plan.
Template 2. Section B. Part 1.b. State Level Objectives	✓			Objectives should be progressive and reflect the dynamic nature of a multi-year project as it evolves over the years in support of program goals. States may amend nutrition education and obesity prevention activities during the 3-year cycle and submit a Plan amendment as necessary.
Template 2. Section B. Part 2. SNAP-Ed Projects, Campaigns	✓			
Template 2. Section B: Part 3. SNAP-Ed evaluation Part 4. Coordination	✓			
Template 3. Staffing	✓			Submit estimates for each year with the initial Plan submission. Complete updates with Plan amendments, as necessary.
Template 4. Budget Information	✓	✓	✓	Submit a projected budget for the 3-year Plan. Submit line item budgets and budget narratives annually showing changes and details for upcoming fiscal year.
Template 5. Assurances	✓			Complete and submit in year 1 for the full 3-year cycle.
Template 7: Signatures	✓	✓	✓	Submit a signature page for the initial Plan and any Plan amendments.
Template 8: Time and Effort Documentation	✓			As required by regulations. Should be completed bi-weekly as documentation for staff paid with SNAP-Ed funds who work less than full time.
Template 9: EARS Reporting	✓	✓	✓	

Plan Amendments

State agencies must submit amendments of approved Plans to FNS for prior approval, with supporting documentation, no later than May 1 of the current fiscal year. Plan amendments are necessary whenever there is a change in the scope of activities or an increase in the budget by 5 percent or \$100,000, cumulative for the current fiscal year, whichever is less. A change in the scope of activities is defined as requests for payment of new or substantially revised SNAP-Ed activities. Examples include, but are not limited to, the incorporation of new environmental or public health approaches, significant expansion of activities, etc.

Other instances when a Plan amendment may be necessary are whenever there are significant budgetary changes such as requests for additional Federal funds not to exceed the total State grant allocation, contract changes greater than 10 percent of the said contract amount, or anticipated carryover of funds greater than 10 percent of the current fiscal year allocation. FNS recommends that States consult with their respective Regional Offices for technical assistance prior to submitting an amendment.

In the amendments, States should indicate whether the request is for a new or revised project and whether funds will come from carryover funding or from another project activity that has been revised. States should provide a full description of the new or revised activities, providing similar information as for a new project. Amendments may be submitted electronically or by mail to the FNS Regional Office.

Annual Report

The SNAP-Ed Annual Report that describes project activities and budget for the prior year must be submitted by November 30 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 SNAP-Ed Activities:

Summarize the nutrition education and obesity prevention projects and related achievements implemented in the previous fiscal year. Based on evaluation results, include discussion on the outcomes and effectiveness of the SNAP-Ed projects and interventions and how they might be improved in the upcoming fiscal year.

Appendix A, Template 1 has two sections, A and B. 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 implemented during the previous fiscal year. 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 reporting process.

1. **SNAP-Ed Program Overview:** Provide a 1 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 activities and/or to address problems experienced during the past year.
5. **Appendices:** Attach evaluation reports included under item # 3 above. States may also provide a brief description or information that highlights other SNAP-Ed activities 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. Examples are provided Appendix A Template 1 Section B. Include the following information by project or social marketing campaign to ensure that the report meets the basic requirements.

1. **Name of nutrition education and obesity prevention activities.** If multiple activities or social marketing campaigns were part of a single impact evaluation, list them all by activity 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.
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.
 1. 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.

2. 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.
 3. 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 or obesity prevention 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)

The [EARS Form](#) (FNS-759) which is available on the SNAP-Ed Connection collects annual uniform data and information on SNAP-Ed activities. Data elements collected include demographic characteristics of participants receiving SNAP-Ed benefits, topics covered by educational interventions, education delivery sites, education strategies, and resource allocation. Data should be entered into the Food Program Reporting System (FPRS) by December 31.

The EARS form is current through August 31, 2013. The form has been approved for renewal up to August 31, 2016.

An [EARS Online Training Module](#) is available on the SNAP-Ed Connection and can be used as a training resource for new staff, a refresher tool for existing staff, or as a reference tool.

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

The State SNAP Agency is responsible for:

- Providing training and technical assistance to SNAP-Ed implementing agencies regarding the collection of EARS data;
- Reviewing and monitoring SNAP-Ed 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-Ed State Plan process, generate reports for State partners and stakeholders, and generate awareness regarding SNAP-Ed services in the State;
- Submitting the EARS form using the online submission system by the submission date; and
- Participating in Regional EARS trainings.

SNAP-Ed Implementing Agencies are responsible for:

- Collecting, compiling, and submitting accurate EARS data to the State Agency;
- Providing training and technical assistance to local SNAP-Ed 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; and
- 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.

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
General			
	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 maintained at the State?		
	Overall, does the plan seem reasonable and will it accomplish the SNAP mission?		
Needs Assessment			
	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?		
Goals and Objectives			
	Are the State goals and objectives consistent with SNAP-Ed Guidance?		
	Are objectives written in the SMART format?		
	Are the key messages included?		
	Do the objectives relate to the State goals and objectives?		
	Do the activities target the SNAP-Ed target audience?		
	Are the activities adequately described?		
	Are the activities supported by research?		
	Are the activities consistent with <i>Dietary Guidelines for Americans</i> and <i>MyPlate</i> ?		
	Are 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 public health approaches?		
	Does the Plan demonstrate a coordinated approach using the SEM?		
Evaluation			
	Is the evaluation type defined?		
	Is the methodology adequately defined?		
	Are plans for using the results defined?		
Coordination Efforts			
	Are coordination efforts designed so duplication of efforts is eliminated?		
	Is SNAP-Ed's role in State SNAP defined?		
Staffing			
	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?		
Budget			
	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?		
Assurances			
	Are assurances included?		
	Are assurances signed?		
	Is the EARS 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 to remind States of the documentation they must be able to provide during an onsite review.

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.
- Nutrition education and obesity prevention activities 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.
- States are adhering to Civil Rights and EEO requirements.

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 (a sample cover letter is included in the ME Evaluation Guide)
- 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 activities within the State
 - Operational consistency with approved SNAP-Ed Plan

- Targeting mechanisms for eligible SNAP-Ed populations
- Evaluation and effectiveness of SNAP-Ed activities
- Financial management:
 - Time and Effort records
 - Administrative expenses documented and allowable
 - Program income accurately reported
- Curriculums and other 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

SNAP-Ed Guidance

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 did FNS determine initial State allocations of SNAP-Ed funds and how will FNS continue to allocate funds?

Each State agency that submitted an approved fiscal year 2009 SNAP-Ed Plan received a 100 percent Federal grant in fiscal year 2011 and will continue to receive a 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 each fiscal year and have a 2-year period of performance;**
- **Are the only source of Federal SNAP 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; and
- 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 were determined for FY 2013 and thereafter as follows:

(1) For fiscal year 2013, the State's percentage 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 for FY 2010, as reported in February 2011, 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 for FY 2011, as reported in February 2012, 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 for FY 2012, as reported in February 2013, 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 for FY 2013, as reported in February 2014, 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.

What happens if a 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 that purpose.

Fiscal Recordkeeping and Reporting Requirements

Form SF-425 State Agency 7CFR 277 (OMB Circular A-87) OMB No. 0584-0067

Each participating State agency must meet FNS fiscal recordkeeping and reporting requirements. **States must complete the following forms:**

- (1) **SF-425, Federal Financial Report.** This quarterly report captures the State agency's expenditures of Federal SNAP-Ed funds during the report quarter, and the amount of obligations for SNAP-Ed costs that remain unliquidated at the end of the report quarter. This report is 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.
- (2) **FNS-759, SNAP-Ed Education Administrative Reporting System (EARS).** This report captures data on the numbers of SNAP-Ed participants, their characteristics (such as ages, racial/ethnic identities, etc.), the types of SNAP-Ed services provided, the Federal and non-Federal sources of funding for SNAP-Ed, etc.

Allowable Costs

How can a 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 considered SNAP-Ed activities, therefore chargeable to a 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 described 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. As examples, such activities may include, but are not limited to, the following:

1. Providing nutrition education and obesity prevention activities 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 nutrition interventions or 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 activities for the SNAP-Ed audience. Examples include: (a) simple measuring of height and weight by SNAP-Ed staff in determining BMI, as preparation for discussing the prevention or management of overweight and obesity; and (b) administering dietary intake questionnaires on nutrition knowledge and behaviors.

As examples, the following are not SNAP-Ed activities and their costs are not allowable charges:

1. SNAP Outreach
2. Medical Nutrition Therapy, Appendix C, Definitions of Terms

3. Providing SNAP-Ed services to persons not eligible for SNAP benefits. Appendix E, College and 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.

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 compared with 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 the SNAP-Ed target audience, then 20 percent 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 influencing 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 years' 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, and the results must be reconciled with property records, at least once every 2 years or more often.**

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 are the Federal cost principles located?

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-Education?

Allowable administrative costs are operational costs of carrying out SNAP-Education in accordance with the State's approved SNAP-Education Plan. Lists of allowable and unallowable cost items as examples 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-Education 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-Education.

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 and 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-Education 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 in such organizations for nutrition personnel that work in SNAP-Education are **not** allowable. This change in policy from last year's Guidance considers economic efficiencies. 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 include 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 the 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 depends 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, i.e., health promotion and primary prevention of disease should be the focus and aim of SNAP-Ed activities. The purpose of public health organizations is generally for 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

Local school wellness programs 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 other eligible venues. These activities help generally low-income students and their families make healthy nutrition and physical activity-related decisions in accordance with the *Dietary Guidelines for Americans* 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
Literature/Materials/Audiovisuals	
<ul style="list-style-type: none"> • The purchase of Food, Nutrition and Consumer Services (FNCS) nutrition education/promotion materials that address SNAP-Ed topics and are for use with or distribution to the SNAP-Ed audience • 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 • The production of State SNAP-Ed 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 SNAP-Ed materials and in sharing the production costs. 	<ul style="list-style-type: none"> • Costs for any nutrition education materials that have already been charged to another Federal or private program or source • Any material that endorses or promotes brand name products or retail stores • Manufacturer's or store (cents off) coupons • 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 • Purchase or production of written or visual nutrition education messages, that is not consistent with the current <i>Dietary Guidelines for Americans</i> and <i>MyPlate</i>
Social Marketing Campaigns	
<ul style="list-style-type: none"> • Local radio and television announcements of nutrition education events for the SNAP-Ed target audience • 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 SNAP 	<ul style="list-style-type: none"> • 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. • Publication or dissemination of nutrition education and obesity prevention messages that are inconsistent with the current <i>Dietary Guidelines for Americans</i> and <i>MyPlate</i> • Television and radio announcements/ advertisements that do not include a brief message about SNAP, its benefits, and how to apply

ALLOWABLE	UNALLOWABLE
Equipment	
<ul style="list-style-type: none"> • Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment. • Equipment shared with non-SNAP users when cost-shared with those users or used by non-SNAP users when not needed for SNAP-Ed purposes • Kitchen appliances, only with justification of need 	<ul style="list-style-type: none"> • Expenditures for equipment that exceeds prior approval thresholds, i.e., \$5,000 per unit, unless prior approval is received from FNS • Medical equipment except for inexpensive equipment such as anthropometric measuring tools that can be used to measure height and weight to determine and discuss BMI and calorie balance/physical activity
Food Samples, Supplies and Provisions	
<ul style="list-style-type: none"> • Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation, and display of food prepared for demonstration purposes • Food samples associated with educational lessons 	<ul style="list-style-type: none"> • Ongoing snack or food service • Meal sized portions or complete meal service • Cost of food provided as groceries or supplemental food
Nutrition Education and Obesity Prevention	
<ul style="list-style-type: none"> • Classroom setting (salaries, space, equipment, materials) for SNAP Ed audience. 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 is an allowable cost. • Physical activity demonstration, promotion, referral that includes a nutrition-related message based on <i>Dietary Guidelines for Americans</i> • Classes on calorie balance (nutrition and physical activity) to manage weight consistent with the <i>Dietary Guidelines for</i> 	<ul style="list-style-type: none"> • 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 • Medical nutrition therapy and secondary prevention interventions. Appendix C, Definitions • Weight loss classes specific to individuals, individualized meal plans, obesity treatment programs, etc. • Gym memberships, trainers, gym equipment, or facilities. Appendix E, Physical Activity

<p>Americans</p> <ul style="list-style-type: none"> • Activities that assist in advancing a nutrition education or obesity prevention-related community or environmental change for the low-income population 	
<ul style="list-style-type: none"> • The pro rata share of costs of classes that are provided in conjunction with another program, e.g., WIC, provided the State agency describes the method for allocating costs between the programs • Breastfeeding education, promotion, and support which is coordinated with WIC and which supplements and complements WIC services, rather than duplicating or supplanting them • 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: http://www.fns.usda.gov/SNAP//outreach/info.htm. 	<ul style="list-style-type: none"> • Clinical health screening (i.e., cholesterol testing, and blood glucose testing, etc) • Distribution of nutrition education reinforcement items costing over \$4.00 each • Nutrition education costs that are charged to another Federal program such as WIC, EFNEP, Head Start, etc. • Breastfeeding education, promotion, and support that duplicates or is provided through WIC, EFNEP, or Head Start funding • Education provided to incarcerated or institutionalized persons who are not eligible for SNAP • SNAP-Ed activities delivered to most able-bodied students, ages 18 through 49, enrolled in college or other institutions of higher education at least half time. For information on students that may be eligible: http://www.fns.usda.gov/SNAP/applicant_recipients/students.htm. • Activities where the primary objective(s) is (are) to conduct outreach efforts for SNAP or other programs

Space Allocation

<ul style="list-style-type: none"> • 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 • Space donated by local school districts, but only the cost of the space based on depreciation or use allowance 	<ul style="list-style-type: none"> • Commercial rental space charges cannot be used for publicly owned space.
---	--

ALLOWABLE	UNALLOWABLE
Staff Compensation and Training Costs	
<ul style="list-style-type: none"> • SNAP-Ed-related training for program delivery staff • 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 • General briefings to community health care providers serving low-income communities about SNAP-Ed services in the community 	<ul style="list-style-type: none"> • The time volunteers of a non-public agency, e.g., faith-based organizations, many food banks, etc. spend performing SNAP-Ed specific duties • A physician's or other professional time spent distributing nutrition flyers at health fairs when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing • University courses that are not relevant to the practical delivery of SNAP-Ed to the SNAP population • Training or development costs of food service workers or others not directly associated with delivery of SNAP-Ed

Costs Associated With Other Activities

- | | |
|--|---|
| <ul style="list-style-type: none">• 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• Nutrition education activities that promote the selection of healthy foods from vending machines• Participation on relevant nutrition education and obesity prevention related State and local advisory panels focusing on the interests of the SNAP-Ed target audience | <ul style="list-style-type: none">• Organized efforts to influence elected officials and lobbying for legislative/policy changes• Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely SNAP-Ed population• Costs associated with the establishment and maintenance of environmental or policy changes out of the scope of SNAP-Ed, such as infrastructure, equipment, space, land, or construction• 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• Childcare or transportation services provided for SNAP-Ed recipients in conjunction with SNAP-Ed activities• Reinforcement items costing over \$4.00 each. Appendix E, Nutrition Education Reinforcement Items |
|--|---|

SNAP-Ed Guidance

Appendices

- A** **SNAP-Ed 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 and Effort
 - Cost of Travel and Attending Meetings and Conferences
 - Indirect Costs
 - Nutrition Education Reinforcement Materials
 - Valuation of Publicly Owned Space
- F** **SNAP-Ed Connection**
- G** **Notes About Materials**
- H** **Evaluation and Related Resources**

Appendix A Templates for SNAP-Ed Plans and Reports

The following templates are provided for the completion of SNAP-Ed Plans and Annual Reports. Information for all Implementing Agencies should be consolidated where appropriate. Refer to Appendix C Definitions of Terms for terms used in these templates. The templates are available as stand-alone documents on the [SNAP-Ed Connection](#) with the 2014 SNAP-Ed Plan Guidance and are fillable forms in that format and location.

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):**

Click here to enter text.

- **Number of new projects implemented during the reporting year by primary approach (Direct, Indirect, and Social Marketing):**

Click here to enter text.

- **Number of ongoing projects that were operational during the reporting year by primary approach (Direct, Indirect and Social Marketing):**

Click here to enter text.

- **Major achievements (not already addressed):**

Click here to enter text.

- **Major setbacks, if any:**

Click here to enter text.

- **Overall assessment:**

Click here to enter text.

2. SNAP-Ed Administrative Expenditures

Directions - To help FNS better understand State SNAP-Ed administrative expenditures, 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 percentage 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:	Percent of Total Administrative Expenditures for each Implementing Agency by Type of Expense					
	Name of IA:		Name of IA:		Name of IA:	
	Example: X State U		Click here to enter name.		Click here to enter name.	
	% values	\$ values	% values	\$ values	% values	\$ values
Administrative Salary	40%	\$220,000	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.
Administrative Training Functions	15%	\$82,500	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.
Reporting Costs (identify % related to EARS, if possible)	3%	\$16,500	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.
Equipment/Office Supplies	10%	\$55,000	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.
Operating Costs	10%	\$55,000	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.
Indirect Costs	12%	\$66,000	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.
Overhead Charges (space, HR services, etc.)	10%	\$55,000	Click here to enter %.	Click here to enter \$.	Click here to enter %.	Click here to enter \$.

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 below. Include a copy of each evaluation report that was produced in the appendix to this report. Impact evaluation reports should include the components described on the following page. Each evaluation report should identify clearly the associated project name(s) on the cover or first page.

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.

Project Name	Key Project Objective(s)	Target Audience	Check all Evaluation Types for Which Reports Are Included			
			FE	PE	OE	IE
Click here to enter Project Name	Click here to enter Key Project Objective.	Click here to enter Target Audience.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Click here to enter Project Name	Click here to enter Key Project Objective.	Click here to enter Target Audience.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Click here to enter Project Name	Click here to enter Key Project Objective.	Click here to enter Target Audience	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Click here to enter Project Name	Click here to enter Key Project Objective.	Click here to enter Target Audience	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3b. Impact Evaluation:

Include the following items in each impact evaluation report:

- **Name of the Project**

Click here to enter text.

- **Project Goals (specifically those evaluated)**

Click here to enter text.

- **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.

Click here to enter text.

- **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.

Click here to enter text.

- **Findings:** Describe the measurement results for intervention and control or comparison groups at each point data were collected.

Click here to enter text.

- **Description of how evaluation results will be used:**

Click here to enter text.

- **Point of Contact:**

Click here to enter text.

- **Relevant Journal References:**

Click here to enter text.

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).

[Click here to enter text.](#)

5. EARS Feedback:

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

- a. A narrative explanation of the data the agency currently is reporting on the EARS form. Identify the section and item number when providing explanations.

[Click here to enter text.](#)

- b. 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.*

[Click here to enter text.](#)

- c. Rationale for implementing agencies not reporting actual unduplicated data for EARS, if this is the case.

[Click here to enter text.](#)

- d. A narrative description of data that the agency currently is **not** able to report. This information should be reflective of any new SNAP-Ed programming using public health or environmental approaches, multi-level interventions, partnerships, etc.

[Click here to enter text.](#)

- e. Ideas for new questions that could be added to the EARS form to capture relevant information that the agency is unable to report at this time.

[Click here to enter text.](#)

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:

a. Staff/partner trainings

[Click here to enter text.](#)

b. Conference presentations and/or other journal publications

[Click here to enter text.](#)

c. Curriculum development

[Click here to enter text.](#)

d. Partnership activities

[Click here to enter text.](#)

e. Case studies

[Click here to enter text.](#)

f. Award

[Click here to enter text.](#)

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.

[Click here to enter the name of the project or social marketing campaign.](#)

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-partisans?

[Click here to enter key evaluation impact\(s\).](#)

3. Evaluation participants

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

[Click here to enter participant evaluations.](#)

4. Assignment to intervention and control or comparison conditions

4a. 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.

[Click here to enter unit of assignment description.](#)

4b. Describe how assignment to intervention and control groups was carried out.

Be explicit about whether or not assignment was random. For example, 10 kindergarten classrooms were randomly assigned to intervention and control groups.

[Click here to enter assignment and control group description.](#)

4c. Describe how many units and individuals were in the intervention and control groups at the start of the intervention.

[Click here to enter unit and individual description.](#)

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 nutrition **and obesity prevention** 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. Then:*

5a. 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.

[Click here to enter data point description.](#)

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

[Click here to enter results.](#)

7. Reference

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

[Click here to enter reference text.](#)

Needs Assessment Methodology and 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.

A. Existing information (source, content, time frame):

Click here to enter existing information.

B. New information collection (source and content):

Click here to enter new information collection.

Needs Assessment Findings

- 1. Demographic Characteristics of Supplemental Nutrition Assistance Program (SNAP) Target Audience.** *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.*

Target Audience	State
Choose a State.	
Click here to enter Target Audience.	
Click here to enter Target Audience.	
Click here to enter Target Audience.	
Click here to enter Target Audience.	
Click here to enter Target Audience.	

2. Related Behavioral and Lifestyle Characteristics of Supplemental Nutrition Assistance Program (SNAP) Target Audience

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. Cite sources of information.

[Click here to enter behavioral and lifestyle characteristics](#)

3. Other Nutrition-Related Programs Serving Low-Income Persons

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

[Click here to enter other programs](#)

4. Areas of the State Where Supplemental Nutrition Assistance Program Target Audience Is Underserved or Has Not Had Access to SNAP-Ed Previously

[Click here to enter underserved area information](#)

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

[Click here to enter implications and findings](#)

1. State Level Goals and 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

[Click here to enter goals.](#)

b. State Level Objectives

[Click here to enter objectives.](#)

2. Description of projects/interventions. The following information should be provided:

Project Title [Click here to enter project title.](#)

a. Related State Objectives

Specify the objectives that the project/intervention supports.

[Click here to enter State objectives.](#)

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.).

[Click here to enter audience.](#)

c. Focus on SNAP Target Audience

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

[Click here to enter 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.

[Click here to enter project description.](#)

e. Summary of Research

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

[Click here to enter summary.](#)

f. Modification of Project Methods/Strategies

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

[Click here to enter modification.](#)

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.

[Click here to enter existing education materials.](#)

h. Development of New Educational Materials

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

[Click here to enter new education materials.](#)

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.

[Click here to enter kpi.](#)

3. Evaluation Plans

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

- a. **Name:** *the name(s) of each project(s) that will be a part of this evaluation;*

Click here to enter name.

- b. **Type:** *the type of evaluation as primarily a formative, process, outcome or impact assessment;*

Click here to enter type.

- c. **Questions:** *the questions(s) that will be addressed and;*

- o *the approach to conducting the evaluation, including scope, design, measures and data collection;*
- o *plans for using the results*

Click here to enter questions

- d. **Evaluation:** *if the project has been evaluated previously, note the most recent year in which the evaluation was done.*

Click here to enter evaluation.

4. Coordination Efforts

*Describe efforts to coordinate, complement, and collaborate with other programs in order to deliver consistent behavior-focused nutrition messages and more comprehensive interventions. Outline any tasks in the action plan process that SNAP-Ed will lead or conduct during the FY. **Retain written agreements.***

Click here to enter coordination effort.

Staffing

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
Click here to enter title.	Click here to enter definition.	Click here to enter % of time.	Click here to enter % of time.	Click here to enter dollars.
Click here to enter title.	Click here to enter definition.	Click here to enter % of time.	Click here to enter % of time.	Click here to enter dollars.
Click here to enter title.	Click here to enter definition.	Click here to enter % of time.	Click here to enter % of time.	Click here to enter dollars.
Click here to enter title.	Click here to enter definition.	Click here to enter % of time.	Click here to enter % of time.	Click here to enter dollars.
Click here to enter title.	Click here to enter definition.	Click here to enter % of time.	Click here to enter % of time.	Click here to enter dollars.
Total				Click here to enter dollars.

Budget Summary for Sub-Grantee

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

Click here to enter name.

b. Total Federal funding, grant

Click here to enter funding.

c. Description of services and/or products

Click here to enter description.

d. Cost of specific services and/or products

Click here to enter cost.

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 in the following table.

Template 4 Section B
 FY 2014
 SNAP-Ed Plan Budget Information by Project
 Budget Information by Project

7 CFR 272.2 (d)(2)(i)

OMB No. 0584-0083

FY Choose a year. **SNAP-Ed Budget**

State: [Click here to enter state.](#)

Sub-grantee Name: [Click here to enter sub-grantee name.](#)

	Expenses*	Carry-in from Previous FY	Current FY Budget	Non-Federal Support
1.	Salary/Benefits	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
2.	Contracts/Sub-Grants/Agreements**	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
3.	Non-Capital Equipment/Supplies	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
4.	Materials	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
5.	Travel	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
6.	Building/Space	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
7.	Maintenance	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
8.	Equipment and Other Capital Expenditures	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
9.	Total Direct Costs	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
10.	Indirect Costs*** (Indirect Cost Rate=_____)	Click here to enter \$.	Click here to enter \$.	Click here to enter \$.
11.	Total Federal Funds	Click here to enter \$.	Click here to enter \$.	
12.	Estimated Funds Carry-over from Current FY to Next FY, if any****		Click here to enter \$.	Click here to enter \$.

*Provide narrative describing all expenses. **Retain copies on site. ***Provide assurance that the indirect cost rate is an approved rate (Appendix C).

****Please note that funds cannot be carried over into the next Federal Fiscal Year if the funds are in the last year of their 2-year period of performance.

Signature of Responsible Official: _____

Date: [Click here to enter a date.](#)

Travel

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

[Click here to enter benefits.](#)

2. Justification of need for travel

[Click here to enter justifications.](#)

3. Travel destination (city, town or county or indicate local travel)

[Click here to enter destination.](#)

4. Number of staff traveling

[Click here to enter number.](#)

5. Cost of travel for this purpose

[Click here to enter cost.](#)

Total In-State Travel Cost

[Click here to enter cost.](#)

B. Out-of-State Travel

Travel Purpose and/or Name of Conference

1. How attendance will benefit SNAP-Ed program goals and objectives

[Click here to enter benefit.](#)

2. Justification of need for travel

[Click here to enter justification.](#)

3. Travel destination (city and state)

[Click here to enter destination.](#)

4. Number of staff traveling

[Click here to enter number.](#)

5. Cost of travel for this purpose

[Click here to enter cost.](#)

Total Out-of-State Travel Cost

[Click here to enter total costs.](#)

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

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.	<input type="checkbox"/>	<input type="checkbox"/>
2. Efforts have been made to target SNAP-Ed to the SNAP-Ed target population.	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>
4. Documentation of payments for approved SNAP- Ed activities is maintained by the State and will be available for USDA review and audit.	<input type="checkbox"/>	<input type="checkbox"/>
5. Contracts are procured through competitive bid procedures governed by State procurement regulations.	<input type="checkbox"/>	<input type="checkbox"/>
6. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB circulars governing cost issues.	<input type="checkbox"/>	<input type="checkbox"/>
7. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.	<input type="checkbox"/>	<input type="checkbox"/>
8. Program activities are reasonable and necessary to accomplish SNAP-Ed objectives and goals.	<input type="checkbox"/>	<input type="checkbox"/>
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 SNAP can help provide a healthy diet and how to apply for benefits.	<input type="checkbox"/>	<input type="checkbox"/>
10. Messages of nutrition education and obesity prevention are consistent with the Dietary Guidelines for Americans.	<input type="checkbox"/>	<input type="checkbox"/>

**Supplemental Nutrition Assistance Program (SNAP)
Annual Plan for SNAP-Ed
for**

State Agency Choose A State.
Date Click here to enter a date.
FY Choose or enter a Fiscal Year.

Certified By:

Click here to enter a date.

Choose a Title.

Date

Certified By:

Click here to enter a date.

STATE SNAP AGENCY FISCAL REVIEWER

Date

Appendix B: Record Retention Requirements

Record Retention and Management-State Agency and All Sub-Grantees 7CFR 272.2

SNAP regulations require that all records be retained for 3 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 3 years from the date of quarterly claim submittal. Any costs that cannot be substantiated by source documents will be disallowed as charges to SNAP.

Appendix C: Definitions 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 SNAP-Ed
- 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).

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 2 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. Census tract data may be used in targeting audiences for delivery of SNAP-Ed.

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.

<u>Organization</u>	<u>Cognizant Federal Agency</u>
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 of one year through September 30 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 SNAP-Ed 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 dividing the total by the Modified Total Direct Costs. The resulting percentage is applied to each grant to determine its 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 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 the 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 examples of available data sources that can be used to identify low-income populations. Participation in other means-tested Federal assistance programs may also be used as a proxy for low-income since these individuals 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. 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 comprise 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 and its effects and to 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 \$5,000 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 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 2 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

Practice-Based Evidence refers to case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential.

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 is SNAP participants and low-income individuals eligible to receive SNAP or other means-tested Federal assistance programs benefits.

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.), and 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 of 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. 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.

Appendix D: Acronyms

ADP- Automated Data Processing

BPS- Budget Project Statement

CFR- Code of Federal Regulations

CACFP-Child and Adult Care Food Program

CDC-Centers for Disease Control and Prevention

CNPP-Center for Nutrition Policy and Promotion

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

FFY- 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

NCCOR-National Collaborative on Childhood Obesity Research

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

OMB- Office of Management and Budget

PDF- Portable Document Format

PSA- Public Service Announcement

SEM- Social-Ecological Model

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

Appendix 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 program participants consistent with the most current *Dietary Guidelines for Americans*. These efforts include:

- Activities to help participants eat a nutritious diet by providing and linking nutrition education and program benefits.
- Activities to encourage physical activity every day by promoting active living and connecting people with community-based physical activity resources funded by other appropriate entities. Physical activity, particularly when combined with appropriate calorie intake, may aid weight loss and maintenance of weight loss.

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 guidelines in the *Dietary Guidelines for Americans*.

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. Allowable purchases may include inexpensive physical activity equipment such as stability balls, hand weights, jump ropes, hula hoops, etc., to use in ongoing physical activity in conjunction with nutrition education to the low income target audience.

The following form the basic principles of SNAP-Ed 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 for SNAP-Ed that encourages physical activity should include a focus 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.
- **FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity material that is reasonable and necessary for SNAP-Ed purposes. Generally 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, and ones available through the SNAP-Ed Connection, the Centers for Disease Control and Prevention (CDC), and other Federal Government agencies. 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, recreational, and other organizations, 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

Examples of unallowable costs include, but are not limited to, costs incurred for: health club, gym, or fitness class membership fees; large expenditure equipment (e.g., bicycles, treadmills, ellipticals, weight sets, etc.); facilities (rental or modifications); and instructors for continuing exercise classes.

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 the 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 are 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.

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 (tractors, etc.) or the purchase or rental of land for garden plots are not allowable. The purchase of seeds, plants, and small gardening tools and supplies, such as fertilizer and potting soil, 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. Staff salaries to establish and maintain community gardens, i.e., in low-income housing projects, schools, etc. may be allowable but should be submitted to FNS for prior approval. Provision of time for garden maintenance is an example of an opportunity for community participation in addition to SNAP-Ed funding. 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 shall be signed by all collaborating agencies and maintained for inspection.

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 SNAP and therefore not eligible to receive SNAP-Ed. However, a student may be able to get SNAP benefits and 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 school 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 will not be approved due to the fundamental differences in our grants and other grants provided for nutrition education; and

- 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 percent of their time on SNAP-Ed, only 50 percent 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 SNAP-Ed funds. Records must 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 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.
- 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 3 years.
- 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.
- Describe 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 four staff persons per State. **When travel to a national conference is similar in cost to local travel due to locality, States may submit a request to their respective Regional Office for consideration of limited attendance beyond four staff.**

Per Diem Rates - The standard State or Federal per diem rates shall be applied. In addition, all travel restrictions found in the OMB regulations (e.g., 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 Departments of Education, Labor, and 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 that 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 its 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 percent. Each grant would then be charged 16 percent 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, it should note the indirect cost rate agreement in its 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 percent of Modified Total 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 healthy 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 and physical activity messages, and are of nominal value.

FNS shall apply the general rules for determining the allowability of costs, as described in OMB guidance, paramount among which are the reasonable and necessary cost tests. Program reinforcement materials for nutrition education also should:

- Target the SNAP target audience;
- Have a clear relevant and useful connection to particular FNS/SNAP nutrition education or obesity prevention 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 is that 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, or 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 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, the State could only charge \$1,000 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 (FNS) and the National Agricultural Library's Food and Nutrition Information Center (FNIC) sponsor the SNAP-Ed Connection, an online resource system for SNAP-Ed providers. The Web site provides educators with curricula, lesson plans, recipes, photos, 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. FNS encourages State and local projects to submit materials they develop for review and inclusion on the site. (Note: 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 SNAP-Ed Connection Web site include the Recipe Finder and “Build a Cookbook” feature, Photo Gallery, Resource Library (including the Resource Finder education and training materials database), Professional Development Tools (including training resources), Hot Topics A-Z, and connection to National SNAP-Ed resources. State and local SNAP-Ed program contact information is also available. **The site also houses the FNS/NCCOR obesity prevention tool-kit of evidenced-based obesity prevention interventions, and 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 educational resources, including videos, curricula, games, handouts, booklets, displays, Web-based modules, lesson plans, etc., visit the SNAP-Ed Connection Sharing Center at: <http://snap.nal.usda.gov/resource-library/sharing-center> , send an email to SNAP-Ed@ars.usda.gov, or call (301) 504-5414. To donate a copy of a new resource for review and inclusion in the Resource Finder database, please send it to:

SNAP-Ed Connection

Food and Nutrition Information Center

USDA/ARS National Agricultural Library

10301 Baltimore Avenue, Suite 108

Beltsville, MD 20705-2351

Visit the [SNAP-Ed Connection](http://snap.nal.usda.gov) for linkages to many other resources!

Appendix G: Notes About Educational Materials

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 photographs, videos, recordings, 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. See Appendix F.

Guidelines for Duplicating or Editing SNAP-Ed Materials

- If the materials will be reproduced as is, nothing needs to be done.
- When any changes or additions are made to the content or design of SNAP-Ed materials, the SNAP and USDA logos must be removed and the following statement must be added:

“Adapted from U.S. Department of Agriculture, Supplemental Nutrition Assistance Program. USDA does not endorse any products, services, or organizations. Provided by (organizations name).”

- If the name or logo of an organization or company is added to the document, the SNAP and USDA logos must be removed and the following statement must be added:

“Adapted from U.S. Department of Agriculture, Supplemental Nutrition Assistance Program. USDA does not endorse any products, services, or organizations. Provided by (organizations name).”

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 against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and, where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's

income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing, or have speech disabilities and wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).

Persons with disabilities who wish to file a program complaint, please see information above on how to contact us by mail directly or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.) please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

USDA is an equal opportunity provider and employer.

For SNAP publications, add the following paragraph:

For any other information dealing with Supplemental Nutrition Assistance Program (SNAP) issues, persons should either contact the USDA SNAP Hotline Number at (800) 221-5689, which is also in Spanish or call the [State Information/Hotline Numbers](#) (click the link for a listing of hotline numbers by State).

Spanish:

El Departamento de Agricultura de los Estados Unidos (por sus siglas en inglés "USDA") prohíbe la discriminación contra sus clientes, empleados, y solicitantes de empleo a base de raza, color, origen nacional, edad, discapacidad, sexo, identidad de género, religión, represalias y, según corresponda, convicciones políticas, estado civil, estado familiar o paternal, orientación sexual, o si los ingresos de una persona provienen en su totalidad o en parte de un programa de asistencia pública, o información genética protegida de empleo o de cualquier programa o actividad realizada o financiada por el Departamento. (No todos los criterios prohibidos se aplicarán a todos los programas y/o actividades laborales).

Si desea presentar una queja por discriminación del programa de Derechos Civiles, complete el [USDA Program Discrimination Complaint Form](#) (formulario de quejas por discriminación del programa del USDA), que puede encontrar en internet en http://www.ascr.usda.gov/complaint_filing_cust.html, o en cualquier oficina del USDA, o llame al (866) 632-9992 para solicitar el formulario. También puede escribir una carta con toda la información solicitada en el formulario. Envíenos su formulario de queja completo o carta por correo postal a U.S. Department of Agriculture, Director, Office of Adjudication,

1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, por fax al (202) 690-7442 o por correo electrónico a program.intake@usda.gov.

Las personas sordas, con dificultades auditivas, o con discapacidad del habla que deseen presentar sea una queja de EEO (Igualdad de Oportunidades en el Empleo) o del programa, por favor contacte al USDA por medio del Federal Relay Service (Servicio federal de transmisión) al (800) 877-8339 o (800) 845-6136 (en español).

Las personas con discapacidades que deseen presentar una queja del programa, por favor vea la información anterior acerca de cómo contactarnos directamente por correo postal o por correo electrónico. Si necesita medios alternativos de comunicación para obtener información acerca del programa (Braille, caracteres grandes, cinta de audio, etc.) por favor contacte al Centro TARGET del USDA al (202) 720-2600 (voz y TDD).

El USDA es un proveedor y empleador que ofrece igualdad de oportunidades.

Para publicaciones del SNAP, agregue el siguiente párrafo:

Para obtener más información acerca de cuestiones del programa SNAP, las personas deben contactar al número de línea directa del USDA SNAP al (800) 221-5689, que también está en español o llame a [State Information/Hotline Numbers](#) (dé clic en el enlace para obtener un listado de números de línea directa por estado); lo puede encontrar en internet en http://www.fns.usda.gov/snap/contact_info/hotlines.htm.

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:** “USDA 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.”

Appendix H: Evaluation and Related Resources

- SNAP-Ed Connection Web site
<http://snap.nal.usda.gov/professional-development-tools/evaluation>
- Nutrition Education Studies, Food and Nutrition Service (FNS)
<http://www.fns.usda.gov/ora/MENU/Published/NutritionEducation/NutEd.htm>
- Nutrition Education: Principles of Sound Impact Evaluation, FNS, September 2005
<http://www.fns.usda.gov/ora/menu/published/NutritionEducation/Files/EvaluationPrinciples.pdf>
- Evaluating Social Marketing in Nutrition: A Resource Manual by Hersey et. al.
<http://www.fns.usda.gov/ora/MENU/Published/nutritioneducation/Files/evalman-2.PDF>
- Designing Evaluations: 2012 Revision, GAO
<http://gao.gov/assets/590/588146.pdf>
- Building Capacity in Evaluating Outcomes, University of Wisconsin Extension, October 2008
<http://www.uwex.edu/ces/pdande/evaluation/bceo/index.html>
- The 2010 User-Friendly Handbook for Project Evaluation, National Science Foundation
<http://www.westat.com/westat/pdf/news/ufhb.pdf>
- Developing a logic model: Teaching and training guide, E. Taylor-Powell and E. Henert. University of Wisconsin Extension, February 2008
<http://www.uwex.edu/ces/pdande/evaluation/evallogicmodel.html>
- Harris et al. An introduction to qualitative research for food and nutrition professionals. *J Am Diet Assoc.* 2009;109:80-90.
- National Collaborative on Childhood Obesity Research (NCCOR) – Policy Evaluation Webinar Series, February 2009
<http://nccor.org/resources/nccor/webinars.php#fourpart>
- NCCOR – Measures Registry
<http://nccor.org/projects/measures/index.php>

- NCCOR – Catalogue of Surveillance Systems
<http://tools.nccor.org/css/>
- An Evaluation Framework for Obesity Prevention Policy Interventions. CDC – Preventing Chronic Disease: Volume 9, 2012: 11_0332.
http://www.cdc.gov/pcd/issues/2012/11_0322.htm
- Child Trends Research-to-Results Brief: Publication#2009-36. Online Resources for Identifying Evidence-Based, Out-of-School Time Programs: A User’s Guide.
http://www.childtrends.org/Files/Child_Trends-2009_07_26_RB_OnlineEBP.pdf
- Center for Training and Research Translation (CenterTRT) <http://centertrt.org/>
Evaluation Framework http://centertrt.org/?p=evaluation_framework
Evaluation Resources http://centertrt.org/?p=evaluation_resources
- Virginia Tech, Reach Effectiveness Adoption Implementation Maintenance (RE-AIM)
<http://www.re-aim.org/>