



JUN 13 2008

United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

3101 Park  
Center Drive

Alexandria, VA  
22302-1500

**SUBJECT:** Health Care Organizations as a Venue for Food Stamp Program Nutrition Education Delivery

**TO:** All Regional Administrators  
Food Stamp Program Directors  
Food and Nutrition Service

This policy memorandum is to clarify the language used in the 2009 Food Stamp Nutrition Education (FSNE) Guidance (pages 57- A. 6.1) regarding the use of health care organizations as FSNE sub-grantees. The language in this section of the Guidance is not intended to prohibit the participation of health care organizations as FSNE providers, but rather to outline a set of precautions to consider when initiating a new contract or managing an existing FSNE program with a health care organization.

Please review the 2009 FSNE Guidance that delineates four areas of concern to consider when using health care organizations as sub-grantees for the delivery of nutrition education.

The Federal Office of Management and Budget Circular A-87 prohibits funding of activities under more than one Federal grant; therefore it is necessary to document how multiple sources of Federal funds are kept separate and discrete and do not fund the same FSNE activity. Sub-grantees that receive funding from two or more Federal sources must place strong emphasis on the accuracy of time sheets to ensure that only one Federal agency is charged for each worker's time. If private (non-profit) health care organizations are used as FSNE sub-grantees, considerable diligence is needed to track funding streams, as the majority of their funding is usually from other Federal sources, such as Medicare or Medicaid.

Food and Nutrition Service Regional Offices should provide technical assistance, if needed, to State agencies regarding these concerns, and encourage States, in turn, to share this information with sub-grantees. Regional staff may contact Jane Duffield, Chief, State Administration Branch at 703-605-4385 if they have questions.

Sincerely,

Jessica Shahin  
Acting Associate Administrator  
Food Stamp Program