United States Department of Agriculture

Nutrition Education and Obesity Prevention Program

FY 2020 SNAP-Ed Plan Guidance

Supplemental Nutrition Assistance Program Education

USDA Supplemental Nutrition Assistance Program

Putting Healthy Food Within Reach

Food and Nutrition Service

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Introduction

This Fiscal Year (FY) 2020 Supplemental Nutrition Assistance Program Education (SNAP-Ed) Plan Guidance provides instructions for developing and submitting State nutrition education and obesity prevention grant program plans, commonly referred to as State SNAP-Ed Plans. It describes Food and Nutrition Service (FNS) expectations regarding State SNAP-Ed requirements and includes examples of activities that can be used in SNAP-Ed programming. Some sections have been broadened to provide additional instructions and in some places, new information has been added.

Sections that include new content or have revisions will be marked with text reading **New:** with the end of the new section marked with **End of new material** to assist users in identifying this information. Additional minor edits throughout have been made to assure consistency and to correct insignificant editorial and grammatical issues. Activities that are State requirements, FNS expectations, or are significant to program implementation are set in **bold** type to facilitate identification.

The FY 2020 SNAP-Ed Plan Guidance supersedes previous releases and provides instructions to States to implement all provisions of

New: In the 2020 Plan Guidance

FNS continues to support enhancement of SNAP-Ed services by providing improvements and clarifications in the SNAP-Ed Plan Guidance. This year, FNS made the following revisions to improve program operations:

- Information about FNS' new *Start Simple with MyPlate* campaign (p.10, 164)
- Information about resources for the new Nutrition Facts Label (p.11, 164)
- Clarification on State agency requirements for monitoring implementing agencies (p.32)
- Instructions for describing how States electronically receive evaluation information about progress on SNAP-Ed State-level goals and objectives (p.46)
- Clarification of administrative cost categories in order to implement provisions of the Agriculture Improvement Act of 2018 (p.52, 61, 103, 110)
- Instructions for reporting total FY funding, including unobligated balances (p.53)
- Instructions for reporting evaluations using the SNAP-Ed Evaluation Framework Priority Indicators (p.62)
- Clarification on recordkeeping requirements (p.68)
- Considerations for measuring weight and BMI in group settings (p.69)
- Clarifications for determining necessary costs (p.70)
- Clarification on determining prorated costs (p.71)
- Clarification on entertainment costs (p.74)
- Allowability of SNAP-Ed for use in the Disaster Supplemental Nutrition Assistance Program (D-SNAP) (p.81)

End of new material.

Section 4019 of the Agriculture Improvement Act of 2018.

Summary of Regulations and Background

The SNAP-Ed Plan Guidance includes provisions of the FNA, Section 28, as amended by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), and the SNAP: Nutrition Education and Obesity Prevention Grant Program Final Rule.

The final rule, SNAP: Nutrition Education and Obesity Prevention Grant Program, adopts the amended interim rule published April 5, 2013, to implement the SNAP Education (SNAP-Ed) provisions of the HHFKA. The rule also implements a provision of the Agricultural Act of 2014 to authorize physical activity promotion in addition to promotion of healthy food choices as part of this nutrition education and obesity prevention program. Highlights include:

- States, in consultation with local operators of other Federal and State programs must present a valid and data-driven needs assessment of nutrition, physical activity, and obesity prevention needs of the target population and their barriers to accessing healthy foods and physical activity in the State SNAP-Ed Plan. This helps to ensure SNAP-Ed activities complement the nutrition education and obesity prevention efforts of these programs.
- Under this rule, States must implement two or more of the following complementary approaches to deliver evidence-based nutrition education and obesity prevention activities that are based on the Dietary Guidelines for Americans (DGA)
    - individual or group-based nutrition education, health promotion, and intervention strategies;
    - comprehensive, multi-level interventions; and
    - community and public health approaches.

SNAP nutrition education and obesity prevention services

Per 7 CFR §272.2 (d)(2)(vii)(B), SNAP-Ed services are

> "a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, demonstrated to facilitate 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 receive benefits under SNAP or other means-tested programs and individuals residing in communities with a significant low-income population."

Interventions: A specific set of evidence-based, behaviorally-focused activities and/or actions to promote healthy eating and active lifestyles.

Intervention strategies: Broad approaches to intervening on specific target areas.

- The target audience for SNAP-Ed is defined as SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs, such as Medicaid or Temporary Assistance for Needy Families, as well as individuals residing in communities with a significant low-income population.

States must meet SNAP-Ed statutory, regulatory, and policy recommendations including:

- Implementing policy, systems, and environmental change (PSE) approaches, such as multi-level interventions and community and public health approaches in addition to individual or group-based (direct) nutrition education, to deliver effective, evidence-based nutrition education and obesity prevention programming.
- Coordinating with and complementing nutrition education and obesity prevention services delivered in other U.S. Department of Agriculture (USDA) nutrition and education programs, as well as other Federal nutrition and nutrition education programs. Programs for partnership include the Expanded Food and Nutrition Education Program (EFNEP), the Food Distribution Program on Indian Reservations (FDPIR), the Commodity Supplemental Food Program (CSFP) and the National School Lunch Program (NSLP), among others.
- Partnering with other national, State, and local initiatives to further the reach and impact of SNAP-Ed activities. Developing and enhancing partnerships is critical to instituting multi-level interventions and community and public health approaches in communities.
- Evaluating SNAP-Ed interventions using evaluation indicators across the Social-Ecological Model, such as those identified in FNS's SNAP-Ed Evaluation Framework, that are specific to each intervention and the overall plan's impact using appropriate outcome measures and indicators.
- **FNS requires States to consult with Tribes about the SNAP State Plan of Operations, which includes the State SNAP-Ed Plan. States must actively engage in Tribal consultations with Tribal leadership or their designees, as required by SNAP regulations at 7 CFR 272.2(b) and 272.2(e) (7).** FNS reminds States of this requirement as it relates to SNAP-Ed. The consultations must pertain to the unique needs of the members of Tribes.

Determining SNAP-Ed State Allocations

The method for determining State SNAP-Ed allocations is based on State shares of SNAP-Ed expenditures in addition to State shares of SNAP participation. For FY 2018 and each year thereafter, the ratio of expenditures to participation is a 50/50 weighting of expenditures to participation. Estimated FY 2018 allocations to assist States in preparing their FY 2018 Plan budgets are attached to the transmittal correspondence accompanying this document.

SNAP Promotion Rule and SNAP-Ed

Per the 7 CFR 277.4 (b)(5), recruitment activities designed to persuade an individual to apply for SNAP benefits; television, radio, or billboard advertisements that are designed to promote SNAP benefits and enrollment; or agreements with foreign governments designed to promote SNAP benefits and enrollment are prohibited.

For SNAP-Ed, this means that information regarding SNAP enrollment should not be placed on any billboard, radio, television or video recording that may be part of a SNAP-Ed intervention. Basic SNAP Information or a link to SNAP information may be placed on handouts, brochures, recipes, etc. only.

Want to find the full text of the regulations and resources listed in this section? You can find them at:

- Food and Nutrition Act of 2008, as amended: https://legcounsel.house.gov/Comps/Food%20And%20Nutrition%20Act%20Of%202008.pdf
- Agriculture Improvement Act of 2018, Section 4019: https://www.congress.gov/bill/115th-congress/house-bill/2/text?format=txt
- Healthy, Hunger-Free Kids Act of 2010 (HHFKA): https://www.fns.usda.gov/sites/default/files/PL_111-296.pdf
- SNAP: Nutrition Education and Obesity Prevention Grant Program Final Rule: https://www.federalregister.gov/documents/2016/03/31/2016-07179/supplemental-nutrition-assistance-program-nutrition-education-and-obesity-prevention-grant-program
- SNAP Promotion Final Rule: https://www.federalregister.gov/documents/2016/12/20/2016-30621/supplemental-nutrition-assistance-program-promotion
- 2015-2020 Dietary Guidelines for Americans (DGA): https://health.gov/dietaryguidelines/2015/guidelines/

Section 1: Overview

SNAP is the nation's first line of defense against hunger and a powerful tool to improve nutrition among low-income people. A USDA study found that participating in SNAP for 6 months is associated with a significant decrease in food insecurity[1]. An additional USDA study found that SNAP participants typically spend less on average on food than eligible non-participants, and spend more of their food dollars on foods prepared at home[2]. Further studies indicate that overall, there are no major differences between the types of foods purchased by SNAP-participating households and non-participating households[3].

SNAP-Ed supports SNAP's role in addressing food insecurity and is central to SNAP's efforts to improve nutrition and prevent or reduce diet-related chronic disease and obesity among SNAP recipients. SNAP-Ed is an important priority for the USDA/FNS, and the Agency appreciates the leadership demonstrated by States towards this mutual commitment to improve the health of low-income families. The SNAP-Ed requirements mandated by the FNA under Section 28 complement and address the FNS mission and the goal and focus of SNAP-Ed. As part of the FNS mission, "We work with partners to provide food and nutrition education to people in need in a way that inspires public confidence and supports American agriculture."

SNAP-Ed Goal:

The SNAP-Ed goal is:

> "To improve the likelihood that persons eligible for SNAP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current DGA and the USDA food guidance."

[1] Mabli, James, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos. *Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security*. Prepared by Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, August 2013.

[2] Tiehen, Laura, Constance Newman, and John A. Kirlin. The Food-Spending Patterns of Households Participating in the Supplemental Nutrition Assistance Program: Findings From USDA's FoodAPS, EIB-176, U.S. Department of Agriculture, Economic Research Service, August 2017.

[3] Garasky, Steven, Kassim Mbwana, Andres Romualdo, Alex Tenaglio and Manan Roy. Foods Typically Purchased by SNAP Households. Prepared by IMPAQ International, LLC for USDA, Food and Nutrition Service, November 2016.

SNAP-Ed Focus:

The focus of SNAP-Ed is:

- Implementing strategies or interventions, among other health promotion efforts, to help the SNAP-Ed target audience establish healthy eating habits and a physically active lifestyle;
- Primary prevention of diseases to help the SNAP-Ed target audience that has risk factors for nutrition-related chronic disease, such as obesity, prevent or postpone the onset of disease by establishing healthier eating habits and being more physically active.

SNAP-Ed Guiding Principles

The SNAP-Ed Guiding Principles characterize FNS's vision of quality nutrition education and address the nutrition concerns and food budget constraints faced by those eligible for SNAP. These Guiding Principles reflect the definitions of nutrition education and obesity prevention services and evidence-based interventions that stem from the FNA.

FNS strongly encourages States to use these Guiding Principles as the basis for SNAP-Ed activities in conjunction with the SNAP-Ed goal and behavioral outcomes. States may focus their efforts on other interventions based on the DGA that address their target audiences by providing justification and rationale in their SNAP-Ed Plans.

SNAP-Ed eligible individuals refers to the **SNAP-Ed target audience**, specifically SNAP participants and other low-income individuals who qualify to receive SNAP benefits or other means-tested Federal assistance programs. It also includes individuals residing in communities with a significant (50 percent or greater) low-income population. The term "**means-tested Federal assistance programs**" for the purposes of this Guidance is defined as Federal programs that require the income and/or assets of an individual or family to be at or below 185 percent of the Federal Poverty Guidelines in order to qualify for benefits. There may be additional eligibility requirements to receive these programs, which provide cash and noncash assistance to eligible individuals and families.

The Six SNAP-Ed Guiding Principles:

1. SNAP-Ed is intended to serve SNAP participants, low-income individuals eligible to receive SNAP benefits or other means tested Federal assistance programs, and individuals residing in communities with a significant low-income population.

REFER TO SECTION 2, GUIDELINES FOR DEVELOPING THE SNAP-ED PLAN

2. SNAP-Ed must include nutrition education and obesity prevention services consisting of a combination of educational approaches. The DGA describes the Social-Ecological Model (SEM) which illustrates how all sectors of society, including individuals and families, communities and organizations; small and large businesses; and policymakers combine to shape an individual's food and physical activity choices. The SEM, shown on the next page, offers an opportunity to address providing SNAP nutrition education and obesity prevention services to the low-income SNAP-Ed target audience through the three approaches described in the FNA.

Approach One: Individual or group-based direct nutrition education, health promotion, and intervention strategies
Approach Two: Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels
Approach Three: Community and public health approaches to improve nutrition

A Social-Ecological Model for Food & Physical Activity Decisions

The Social-Ecological Model can help health professionals understand how layers of influence intersect to shape a person's food and physical activity choices. The model below shows how various factors influence food and beverage intake, physical activity patterns, and ultimately health outcomes.

DATA SOURCES: Adapted from: (1) Centers for Disease Control and Prevention. Division of Nutrition, Physical Activity, and Obesity. National Center for Chronic Disease Prevention and Health Promotion. Addressing Obesity Disparities: Social Ecological Model. Available at: http://www.cdc.gov/obesity/health_equity/addressingtheissue.html. Accessed October 19, 2015. (2) Institute of Medicine. Preventing Childhood Obesity: Health in the Balance, Washington (DC): The National Academies Press; 2005, page 85. (3) Story M, Kaphingst KM, Robinson-O'Brien R, Glanz K. Creating healthy food and eating environments: Policy and environmental approaches. Annu Rev Public Health 2008; 29:253-272.

Nutrition education and obesity prevention services are delivered through partners in multiple venues and involve activities at the individual, interpersonal, community, and societal levels. Acceptable policy interventions are activities that encourage healthier choices based on the current DGA. Intervention strategies may focus on increasing consumption of certain foods, beverages, or nutrients and limiting consumption of certain foods, beverages, or nutrients consistent with the DGA.

REFER TO CHAPTER 3 OF THE DGA FOR MORE INFORMATION ABOUT THE SEM AND HOW IT CAN INFORM NUTRITION EDUCATION AND OBESITY PREVENTION ACTIVITIES.

3. While the Program has the greatest potential impact on behaviors related to the nutrition and physical activity of the overall SNAP low-income households, when it targets low-income households with SNAP-Ed eligible women and children, SNAP-Ed is intended to serve the breadth of the SNAP eligible population. Based on a needs assessment, States have the flexibility to determine priority audience segments which would be best served by SNAP-Ed.

REFER TO GUIDELINES FOR DEVELOPING THE SNAP-ED PLAN SECTION

4. The Program must use evidence-based, behaviorally focused interventions and maximize its national impact by concentrating on a small set of key population outcomes supported by evidence-based multi-level interventions. Evidence-based interventions based on the best available information must be used. FNS encourages States to concentrate their SNAP-Ed efforts on the program's key behavioral outcomes.

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 SNAP-Ed **key behavioral outcomes** align with the DGA key recommendations, found at https://www.cnpp.usda.gov/sites/default/files/dietary_guidelines_for_americans/ExecSumm.pdf,

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

5. The Program 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.

REFER TO COORDINATION AND COLLABORATION REQUIREMENTS SECTION

6. The Program is enhanced when the specific roles and responsibilities of local, State, regional, and national SNAP agencies and SNAP-Ed providers are defined and put into practice.

REFER TO SNAP-ED ROLES AND RESPONSIBILITIES

Sources of Nutrition and Obesity Prevention Guidance

DIETARY GUIDELINES FOR AMERICANS (DGA): These guidelines are the foundation of nutrition education and obesity prevention efforts in all FNS nutrition assistance programs. **The FNA stipulates that SNAP-Ed activities, strategies, and interventions should be consistent with the DGA and the associated USDA food guidance system, MyPlate.** MyPlate messages and resources are available at http://www.choosemyplate.gov/. SNAP-Ed intervention strategies may focus on limiting, as well as increasing, consumption of certain foods, beverages, and nutrients consistent with the DGA. **However, FNS has determined that States may not use SNAP-Ed funds to convey negative written, visual, or verbal expressions about any specific brand of food, beverage, or commodity.** FNS encourages State agencies to consult with their SNAP-Ed Regional Coordinators to ensure that the content and program efforts appropriately convey the DGA and MyPlate. For more information, please refer to the USDA Center for Nutrition Policy and Promotion's (CNPP) Web site at http://www.cnpp.usda.gov/.

One of the five guidelines from the DGA is to follow a healthy eating pattern across the lifespan at an appropriate calorie level. Doing so helps to support a healthy body weight and reduce the risk of chronic disease. **FNS expects that healthy eating patterns, weight management, and obesity prevention for the low-income population will be a key component of SNAP-Ed Plans** due to the focus on nutrition education and obesity prevention of the FNA under Section 28. States are strongly encouraged to use MyPlate and related resources found at http://www.choosemyplate.gov/ to support their SNAP-Ed Plans. **New:** CNPP recently developed a new campaign, Start Simple with MyPlate, to promote healthy eating and physical activity.

Start simple with MyPlate

- *START SIMPLE WITH MYPLATE* (https://www.choosemyplate.gov/start-simple-myplate) provides tips from the five MyPlate food groups (Fruits, Vegetables, Grains, Protein Foods, Dairy) that Americans can easily incorporate into their busy lives
- The ideas fit a variety of food preferences, health goals, and budgets
- The goal is to help consumers with daily food choices, increase awareness of the MyPlate food groups, and provide ways to meet food group targets. **End of new material.**

Other resources that complement the DGA and can assist States in addressing healthy weight management and obesity prevention include the following:

- ***Physical Activity Guidelines (PAG)***: The PAG provide science-based information and guidance on the amounts and types of physical activities Americans 6 years and older need for health benefits. The PAG are intended for health professionals and policymakers and are accompanied by resources to help guide the physical activity of the general public. The DGA provides a key recommendation that encourages Americans to meet the Physical Activity Guidelines (PAG).
- ***Healthy People 2020 (HP 2020) Plan***: These objectives are science-based, 10-year national objectives for improving the health of all Americans that include established benchmarks and the monitoring of progress over time. The Nutrition and Weight Status and Physical Activity objectives of HP 2020 with related data and information on interventions and resources can assist States in formulating objectives and selecting interventions in these areas. More information on HP 2020 may be obtained at http://healthypeople.gov/.
- ***Core Nutrition Messages***: FNS's series of core nutrition messages are complementary to the DGA. The messages and related resources address motivational mediators and intervening factors that are relevant to low-income moms and children. These messages can be used in educational resources to help low-income audiences put the DGA into practice. FNS core nutrition messages resources are available at http://www.fns.usda.gov/core-nutrition/core-nutrition-messages.
- **New:** ***U.S. Food and Drug Administration Nutrition Facts Label***: The U.S. Food and Drug Administration has finalized a new Nutrition Facts label for packaged foods that will make it easier for consumers to make informed food choices that support a healthy diet. The updated label has a fresh new design and reflects current scientific information, including the link between diet and chronic diseases. More information on the Nutrition Facts label may be found at http://www.fda.gov/nutritioneducation. **End of new material.**

Approaches

The FNA stipulates that SNAP-Ed funds may be used for evidence-based activities using one of the three SNAP-Ed approaches. **States must include one or more approaches in addition to Approach One in their SNAP-Ed Plans.**

FNS expects SNAP agencies to use comprehensive interventions in SNAP-Ed that address multiple levels of the SEM to reach the SNAP-Ed target audience in ways that are relevant and motivational to them. Working with partners to achieve this aim furthers SNAP-Ed's collaborative efforts, reduces the likelihood of duplication of effort, and aligns SNAP-Ed's strategies with current public health practices for health promotion and disease prevention.

Approach One: Individual or group-based direct nutrition education, health promotion, and intervention strategies

Activities conducted at the individual and interpersonal levels have been a nutrition education delivery approach in SNAP-Ed and remain important. **These activities must be evidence-based, as with interventions conducted through the other Approaches.**

Approach One activities must be combined with interventions and strategies from Approaches Two and/or Three. Direct nutrition education may be conducted by a SNAP-Ed provider organization or by a partner organization through a collaborative effort.

The direct nutrition education and physical activity interventions implemented should incorporate features that have shown to be effective such as:

- Behaviorally-focused strategies;
- Motivators and reinforcements that are personally relevant to the target audience;
- Multiple channels of communication to convey healthier behaviors;
- Approaches that allow for active personal engagement; and
- Intensity and duration that provide opportunities to reinforce behaviors.

Some examples of Approach One allowable activities for States to consider include, but are not limited to:

- Conducting nutrition education based on the DGA including:
    - Following a healthy eating pattern across the lifespan;
    - Focusing on variety, nutrient density, and amount within each food group;
    - Limiting calories from added sugars and saturated fat and reducing sodium intake; and shifting to healthier food and beverage choices.
- Conducting individual or group educational sessions on achieving and maintaining a healthy body weight based on the DGA. These sessions could

include measuring height and weight or using self-reported heights and weight to determine body mass index (BMI).
- Integrating nutrition education into ongoing physical activity group interventions based on the Department of Health and Human Services (HHS) Physical Activity Guidelines
- Implementing classes to build basic skills, such as cooking or menu planning.
- Sponsoring multi-component communication activities to reinforce education, such as interactive Web sites, social media, visual cues, and reminders like text messages.
    - An example would be the Eating Smart Being Active curriculum at https://snaped.fns.usda.gov/materials/eating-smart-being-active.

Approach Two: Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels

Approach Two may address several or all elements of the SEM 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.) levels. **A key tenet of multi-level interventions is that they reach the target audience at more than one level of the SEM and that the interventions mutually reinforce each other.** Multi-level interventions generally are thought of as having three or more levels of influence.

In SNAP-Ed, States may implement PSE change efforts using the multi-level interventions of Approach Two according to the definition of nutrition education and obesity prevention services in the *INTRODUCTION* section of this document.

Examples of efforts from Approach Two that States may want to implement in conjunction with Approach One include but are not limited to, these:

- Developing and implementing nutrition and physical activity policies at organizations with high proportions of people eligible for SNAP-Ed, such as work-sites that employ low-wage earners or eligible youth- and faith-based organizations
- Collaborating with schools and other organizations to improve the school nutrition environment, including supporting and providing nutrition education classes as well as serving on school wellness committees. Local educational agencies (LEAs) are encouraged to include SNAP-Ed coordinators and educators on local school wellness policy committees (see *PARTNERING WITH SCHOOL WELLNESS PROGRAMS IN THE FINANCIAL AND COST POLICY SECTION AND OTHER FEDERAL POLICIES RELEVANT TO THE ADMINISTRATION OF SNAP-ED*).
- 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 food gardens in low-income areas, such as public housing sites, eligible schools, and qualifying community sites
- Providing consultation, technical assistance, and training to SNAP-authorized retailers in supermarkets, grocery stores, a local corner or country store to

provide evidence-based, multi-component interventions. SNAP-Ed providers may work with key partners on strategic planning and provide assistance with marketing, merchandising, recipes, customer newsletters, and technical advice on product placement. The retailer could provide produce, healthy nutrition items, and point of sales space for a healthy checkout lane. For more information on how to develop, implement, and partner on food retail initiatives and activities see the Center for Disease Control (CDC)'s Healthier Food Retail Action Guide at http://www.cdc.gov/nccdphp/dnpao/state-local-programs/healthier-food-retail.html. SNAP is mentioned as a potential partner in CDC's Guide.

- Working to bring farmers markets to low-income areas, such as advising an existing market on the process for obtaining Electronic Benefits Transfer (EBT) machines to accept SNAP benefits
- Coordinating with WIC to promote and support breastfeeding activities

Approach Three - Community and public health approaches to improve nutrition and obesity prevention

Community and public health approaches are efforts that affect a large segment of the population, rather than targeting the individual or a small group. According to the CDC, public health interventions are community-focused, population-based interventions aimed at preventing a disease/condition or limiting death/disability from a disease/condition. Learn more about public health approaches through *CDC's Public Health 101 Series* at https://www.cdc.gov/publichealth101/index.html.

By focusing on neighborhoods, communities, and other jurisdictions (e.g., cities, towns, counties, districts, and Indian reservations with large numbers of low-income individuals), public health approaches aim to reach the SNAP-Ed target audience. **As with Approach Two, PSE change efforts also may be conducted using community and public health approaches.**

Approach Three activities to consider where SNAP-Ed could assist include, but are not limited to, the following:

- Working with local governments in developing policies for eliminating food deserts in low-income areas.
- Collaborating with community groups and other organizations, such as Food or Nutrition Policy Councils, to improve food, nutrition, and physical activity environments to facilitate the adoption of healthier eating and physical activity behaviors among the low-income population.
- Serving on other relevant nutrition- and/or physical activity-related State and local advisory panels, such as school wellness committees and State Nutrition Action Councils (SNAC).
- Delivering technical assistance to a local corner or convenience store to increase healthier offerings and purchases. Corner stores, often referred to as convenience stores, country stores, or bodegas, are small-scale stores that may have a more limited selection of food and other products. The Healthy Corner

Stores Guide, which can be accessed at http://www.fns.usda.gov/healthy-corner-stores-guide , provides information, strategies, and resources for organizations interested in making healthy foods and beverages more available in corner stores within their communities. A Spanish language version is also available at the link above.

- Facilitating the reporting of statewide surveillance and survey data on nutrition indicators among the population that is eligible to receive SNAP benefits.
- Providing obesity prevention interventions at settings, such as schools, child care sites, community centers, places of worship, community gardens, farmers markets, food retail venues, or others with a low-income population of 50 percent or greater.
- Conducting social marketing programs targeted to SNAP-Ed eligible populations about the benefits of physical activity.
- Providing low-income individuals with nutrition information, such as shopping tips and recipes, in collaboration with other community groups who provide access to grocery stores through “supermarket shuttles” to retailers that have healthier options and lower prices than corner stores.
- Conducting health promotion efforts, such as promoting the use of a walking trail through a Safe Routes to Schools program or the selection of healthy foods from vending machines.
- Helping local workplaces establish policies for healthy food environments
- Partnering with non-profits hospitals to coordinate their Internal Revenue Service (IRS)-mandated community benefits program with SNAP-Ed (see https://www.irs.gov/irb/2015-5_IRB/ar08.html for details)

States will note that there is a degree of overlap between Approaches Two and Three and the Social Marketing and PSE change efforts are included in both of these Approaches. This overlap and intersection is indicative of the integrated nature of ways to reach the intended audience through multiple spheres of influence. This is appropriate for developing comprehensive SNAP-Ed Plans.

Social Marketing Programs

In addition to interactive groups and one-on-one instruction, social marketing programs often have been used to deliver nutrition messages to the SNAP-Ed audience. Social marketing may be delivered as part of the multi-level interventions of Approach Two or as part of community and public health efforts of Approach Three.

As described by CDC, social marketing is "the application of commercial marketing technologies to the analysis, planning, execution, and evaluation of programs designed

to influence voluntary behavior of target audiences in order to improve their personal welfare and that of society."[4]

Commercial marketing technologies include market segmentation; formative research and pilot testing; commercial and public service advertising; public relations; multiple forms of mass communication including social media; the 4 Ps of marketing - product, price, placement, and promotion; consumer education; strong integration across platforms; and continuous feedback loops and course correction.

Social marketing can be an important component of some SNAP-Ed interventions and may target the individual in large groups, organizational/institutional, and societal levels. Social marketing emphasizes:

- Targeting an identified segment of the SNAP-Ed eligible audience;
- Identifying needs of the target audience and associated behaviors and perceptions about and the reasons for and against changing behavior;
- Identifying target behavior to address;
- Interacting with the target audience to test the message, materials, approach, and delivery channel to ensure that these are understood and are likely to lead to behavior change; and
- Adjusting messages and delivery channels through continuous feedback using evaluation data and target audience engagement.

Reaching SNAP-Ed Eligible Audiences through Social Marketing

The advertising and public relations aspects of social marketing programs can reach SNAP-Ed eligible audiences through a variety of delivery channels. These channels can include:

- Mass media (e.g., television, radio, newspapers, billboards, and other outdoor advertising)
- Social media (e.g., social networks, blogs, and user-generated content)
- Earned media (e.g., public service announcements, letters to the editor, opinion editorials, and press conferences)
- Peer-to-peer popular opinion leaders (e.g., youth or parent ambassadors, local champions, celebrity spokespersons, and faith leaders)
- Promotional media (e.g., point-of-purchase prompts, videos, Web sites, newsletters, posters, kiosks, brochures, and educational incentive items)

Successful SNAP-Ed social marketing programs should be comprehensive in scope using multiple communication channels to reach target audiences with sufficient frequency and reach. Market research and formative evaluation can help identify communication channels and nutrition-and health-information seeking behaviors that

[4] Alan Andreasen, Marketing Social Change: Changing Behavior to Promote Health, Social Development, and the Environment, Jossey-Bass, 1995.

will best reach different segments of the SNAP-Ed eligible audience. Examples of market research tools that can help identify audience segment characteristics include:

- CDC's *Audience Insights* at http://www.cdc.gov/healthcommunication/Audience/index.html
- National Cancer Institute's *Health Information National Trends Survey* at http://hints.cancer.gov/
- Pew Research Center's *Internet, Science, and Tech* at http://www.pewinternet.org/

Policy, Systems, and Environmental Change Interventions

The DGA recognizes that everyone has a role in helping support healthy eating patterns in multiple settings nationwide, from home to school to work to communities in which people live, learn, work, shop, and play. PSE change efforts can be implemented across a continuum and may be employed on a limited scale as part of the multi-level interventions of Approach Two or in a more comprehensive way through the community and public health approaches of Approach Three or a mix of any combination of all three approaches.

As previously stated, public health approaches are community-focused, population-based interventions aimed at preventing a disease or condition, or limiting death or disability from a disease or condition. Community and public health approaches may include three complementary and integrated elements: education, marketing/promotion, and PSE interventions. Using these three elements helps create conditions where people are encouraged to act on their education and awareness and where the healthy choice becomes the easy and preferred choice, which is facilitated through changes in policy, systems, and the environment. By focusing activities on settings with large proportions of low-income individuals and using evidence-based interventions that are based on formative research with SNAP-Ed audiences, public health approaches can reach large numbers of low-income Americans and produce meaningful impact.

The definitions and examples below can contribute to States understanding more fully SNAP-Ed's role in implementing PSEs.

Policy: A written statement of an organizational position, decision, or course of action. Ideally policies describe actions, resources, implementation, evaluation, and enforcement. Policies are made in the public, non-profit, and business sectors. Policies will help to guide behavioral changes for audiences served through SNAP-Ed programming.

> ***Example:*** A school or school district that serves a majority low-income student body writes a policy that allows the use of school facilities for recreation by children, parents, and community members during non-school hours. The local

SNAP-Ed provider can be a member of a coalition of community groups that work with the school to develop this policy.

Systems: Systems changes are unwritten, ongoing, organizational decisions or changes that result in new activities reaching large proportions of people the organization serves. Systems changes alter how the organization or network of organizations conducts business. An organization may adopt a new intervention, reallocate other resources, or in significant ways modify its direction to benefit low-income consumers in qualifying sites and communities. Systems changes may precede or follow a written policy.

> ***Example:*** A local food policy council creates a farm-to-fork system that links farmers and local distributors with new retail or wholesale customers in low-income settings. The local SNAP-Ed provider could be an instrumental member of this food policy council providing insight into the needs of the low-income target audience.

Environment: Includes the built or physical environments which are visual/observable, but may include economic, social, normative or message environments. Modifications in settings where food is sold, served, or distributed may promote healthy food choices. Social changes may include shaping attitudes among administrators, teachers, or service providers about time allotted for school meals or physical activity breaks. Economic changes may include financial disincentives or incentives to encourage a desired behavior, such as purchasing more fruits and vegetables. **Note that SNAP-Ed funds may not be used to provide the cash value of financial incentives, but SNAP-Ed funds can be used to engage farmers markets and retail outlets to collaborate with other groups and partner with them.**

> ***Example:*** A food retailer serving SNAP participants or other low-income persons increases the variety of fruits and vegetables it sells and displays them in a manner to encourage consumer selection of healthier food options based on the DGA and MyPlate. A SNAP-Ed provider can provide consultation and technical assistance to the retailer on expanding its fruit and vegetable offerings and behavioral techniques to position produce displays to reach the target audience.

Taken together, education, marketing, and PSE changes are more effective than any of these strategies alone for improving health and preventing obesity. This is done by combining reinforcing educational, PSE, and marketing strategies used in SNAP-Ed or conducted by partners such as other FNS or CDC programs. One way to envision the role of SNAP-Ed is that of a provider of consultation and technical assistance in creating appropriate PSE changes that benefit low-income households and communities. **The organization that receives the consultation and technical assistance is ultimately**

responsible for adopting, maintaining, and enforcing the PSE change. For example, as requirements of the HHFKA are implemented in child care and school settings (http://www.fns.usda.gov/school-meals/child-nutrition-programs), SNAP-Ed can build on and complement required changes in menu standards, competitive foods, training, and school wellness policies. Specifically, this is accomplished by providing consultation and technical assistance, while not taking on or supplanting the responsibilities of the cognizant State and local education agencies.

An Evidence-based Approach to SNAP-Ed:

As a reminder, 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.

FOR RESOURCES THAT ASSIST IN IDENTIFYING WHAT CONSTITUTES AN EVIDENCE-BASED INTERVENTION OR APPROACH, PLEASE REFER TO APPENDIX B. CHECKLIST FOR EVIDENCE-BASED APPROACHES.

- **Research-based evidence** refers to relevant rigorous research, including systematically reviewed scientific evidence.
- **Practice-based evidence** refers to case studies, pilot studies, and evidence from the field on interventions that demonstrate obesity prevention potential.
- **Emerging strategies or interventions**, which are community- or practitioner-driven activities that have the potential for obesity prevention, but have not yet been formally evaluated for obesity prevention outcomes. **Emerging strategies or interventions require a justification for a novel approach and must be evaluated for effectiveness.**

Evidence may be related to obesity prevention target areas, intervention strategies, and/or specific interventions. FNS recognizes that there is a continuum for evidence-based practices, ranging from the rigorously evaluated interventions (research-based) that have also undergone peer review to interventions that have not been rigorously tested but show promise based on results from the field (practice-based, including emerging interventions). FNS also recognizes that interventions that target different levels of the SEM could include both research-based and practice-based interventions and approaches. Evidence-based allowable use of funds for SNAP-Ed include conducting and evaluating intervention programs, and implementing and measuring the effects of policy, systems, and environmental changes in accordance with SNAP-Ed Plan Guidance.

Evidence-Based Approach Expectations

FNS expects that SNAP-Ed providers assure that their evidence-based interventions do the following:

- Demonstrate through research review or sound self-initiated evaluation, if needed, that interventions have been tested and are meaningful for their specific target audience(s), are implemented as intended or modified with justification, and have the intended impact on behavior as well as policies, systems, or environments;
- Provide emerging evidence and results of efforts such as State and/or community-based programs that show promise for practice-based interventions. Where rigorous reviews and evaluations are not available or feasible, practice-based evidence may be considered. 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 the implementation of projects built upon practice-based evidence and describe plans to evaluate them.

PLEASE SEE ANNUAL REPORT, TEMPLATE 7: SECTION B. REPORT SUMMARY FOR OUTCOME AND IMPACT EVALUATIONS

Finding Evidence-based Materials

Curricula and other materials developed by FNS are evidence-based. FNS materials have undergone formative evaluation during the developmental phase, review by USDA and HHS experts, and testing with the target audience in most instances. Therefore, curricula and other educational materials developed for SNAP-Ed, such as MyPlate for My Family (MPFMF) and Eat Smart, Live Strong (ESLS) – available at http://pueblo.gpo.gov/SNAP_NEW/SNAPPubs.php – as well as materials developed by Team Nutrition – posted at http://www.fns.usda.gov/tn/team-nutrition - are considered evidence-based.

THE SNAP-ED STRATEGIES AND INTERVENTIONS: AN OBESITY PREVENTION TOOLKIT FOR STATES, which is also known as the SNAP-Ed Toolkit, features evidence-based policy, systems, and environmental changes that support education and social marketing and provides ways to evaluate interventions across various settings. It was developed by the National Collaborative on Childhood Obesity Research (NCCOR) at the request of FNS. Updates to the toolkit will continue to add strategies and interventions that are being used successfully to address obesity in communities across the nation. The interactive SNAP-Ed Toolkit can be found at https://snapedtoolkit.org/. 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.

Evaluating your Evidence-Based Intervention

When existing, validated evaluation tools or instruments are not available for an intervention, the State or Implementing Agencies may need to adapt existing tools or develop new tools. There is no established or formal FNS review process for evaluation tools for SNAP-Ed. When developing new tools or adapting existing tools for your

target audience, follow the established protocols for instrument development. The process for developing reliable and valid evaluation instruments/tools is provided Chapter 4 of the FNS publication "Addressing the Challenges of Conducting Effective SNAP-Ed Evaluations: A Step-by-Step Guide"[5].

It is recommended that Implementing Agencies discuss evaluation tool adaptation or development ideas with their State Agency. State Agency staff should discuss with their SNAP-Ed Regional Coordinator to make sure that you are not duplicating any efforts that others may be engaged in within your State or region. Please note that evaluations should focus on specific, current SNAP-Ed interventions or initiatives in your State's SNAP-Ed Plan. Lastly, before modifying any existing evaluation tool(s), contact the specific developer(s) to be sure that you have permission to do so, and to gain insight into whether modifications would affect the validity of the evaluation tool.

Contributing to the SNAP-Ed Evidence Base

The FNS *SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EDUCATION (SNAP-ED) EVALUATION FRAMEWORK: NUTRITION, PHYSICAL ACTIVITY, AND OBESITY PREVENTION INDICATORS* (SNAP-Ed Framework) was released in 2013 by the USDA/FNS Western Regional Office, updated in 2014, and finalized at the national level in 2016. The evaluation framework includes a focused menu of 51 evaluation indicators that align with SNAP-Ed guiding principles. The indicators lend support to documenting changes resulting from multiple approaches for nutrition education and obesity prevention targeted to a low-income audience. Although a summary graphic of the SNAP-Ed Framework is available on the following page, we encourage readers to visit the interactive SNAP-Ed Framework and interpretive guide at https://snapedtoolkit.org/framework/index/ to learn more about the evaluation indicators.

States that are using the SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention indicators are strongly encouraged to report their State outcomes for priority indicators. The SNAP-Ed priority indicators are listed below, additional information is provided in Appendix B, with additional detail available at both the online SNAP-Ed Toolkit (https://snapedtoolkit.org/framework/index/) and in the SNAP-Ed Evaluation Framework Interpretive Guide (https://snaped.fns.usda.gov/evaluation/evaluation-framework-and-interpretive-guide).

- **Medium-Term(MT)1:** Healthy Eating Behaviors
- **MT2:** Food Resource Management

[5] Cates, S., Blitstein, J., Hershey, J., Kosa, K., Flicker, L., Morgan, K. and Bell,L. *Addressing the Challenges of Conducting Effective Supplemental Nutrition Assistance Program Education (SNAP-Ed) Evaluations: A Step-by-Step Guide*. Prepared by Altarum Institute and RTI International for the U.S. Department of Agriculture, Food and Nutrition Service, March 2014.

- **MT3:** Physical Activity and Reduced Sedentary Behaviors
- **MT5:** Nutrition Supports Adopted in Environmental Settings
- **Short-Term(ST)7:** Organizational Partnerships
- **ST8:** Multi-sector partnerships and planning
- **Population Results(R)2:** Fruits and Vegetables

SNAP-ED EVALUATION FRAMEWORK

Nutrition, Physical Activity, and Obesity Prevention Indicators

	READINESS & CAPACITY SHORT TERM (ST)	CHANGES MEDIUM TERM (MT)	EFFECTIVENESS & MAINTENANCE LONG TERM (LT)
INDIVIDUAL	**GOALS AND INTENTIONS** ST1: Healthy Eating ST2: Food Resource Management ST3: Physical Activity and Reduced Sedentary Behavior ST4: Food Safety	**BEHAVIORAL CHANGES** MT1: Healthy Eating MT2: Food Resource Management MT3: Physical Activity and Reduced Sedentary Behavior MT4: Food Safety	**MAINTENANCE OF BEHAVIORAL CHANGES** LT1: Healthy Eating LT2: Food Resource Management LT3: Physical Activity and Reduced Sedentary Behavior LT4: Food Safety
ENVIRONMENTAL SETTINGS EAT, LIVE, WORK, LEARN, SHOP, AND PLAY	**ORGANIZATIONAL MOTIVATORS** ST5: Need and Readiness ST6: Champions ST7: Partnerships	**ORGANIZATIONAL ADOPTION AND PROMOTION** MT5: Nutrition Supports MT6: Physical Activity and Reduced Sedentary Behavior Supports	**ORGANIZATIONAL IMPLEMENTATION AND EFFECTIVENESS** LT5: Nutrition Supports Implementation LT6: Physical Activity Supports Implementation LT7: Program Recognition LT8: Media Coverage LT9: Leveraged Resources LT10: Planned Sustainability LT11: Unexpected Benefits
SECTORS OF INFLUENCE	**MULTI-SECTOR CAPACITY** ST8: Multi-Sector Partnerships and Planning	**MULTI-SECTOR CHANGES** MT7: Government Policies MT8: Agriculture MT9: Education Policies MT10: Community Design and Safety MT11: Health Care Clinical-Community Linkages MT12: Social Marketing MT13: Media Practices	**MULTI-SECTOR IMPACTS** LT12: Food Systems LT13: Government Investments LT14: Agriculture Sales and Incentives LT15: Educational Attainment LT16: Shared Use Streets and Crime Reduction LT17: Health Care Cost Savings LT18: Commercial Marketing of Healthy Foods and Beverages LT19: Community-Wide Recognition Programs

POPULATION RESULTS (R)

TRENDS AND REDUCTION IN DISPARITIES

R1: Overall Diet Quality
R2: Fruits & Vegetables
R3: Whole Grains
R4: Dairy
R5: Beverages
R6: Food Security
R7: Physical Activity and Reduced Sedentary Behavior
R8: Breastfeeding
R9: Healthy Weight
R10: Family Meals
R11: Quality of Life

CHANGES IN SOCIETAL NORMS AND VALUES

APRIL 2016

Types of Evaluation

There are multiple types of intervention evaluations. SNAP-Ed definitions of evaluation types are:

- ***Formative Evaluation*** 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*** systematically describes how an intervention looks in operation or actual practice. It includes a description of the context in which the program was conducted such as its participants, setting, materials, activities, duration, etc. Process assessments are used to determine if an intervention was implemented as intended. This checks for fidelity, that is, if an evidence-based intervention is delivered as designed and likely to yield the expected outcomes.
- ***Outcome Evaluation*** 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*** 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.

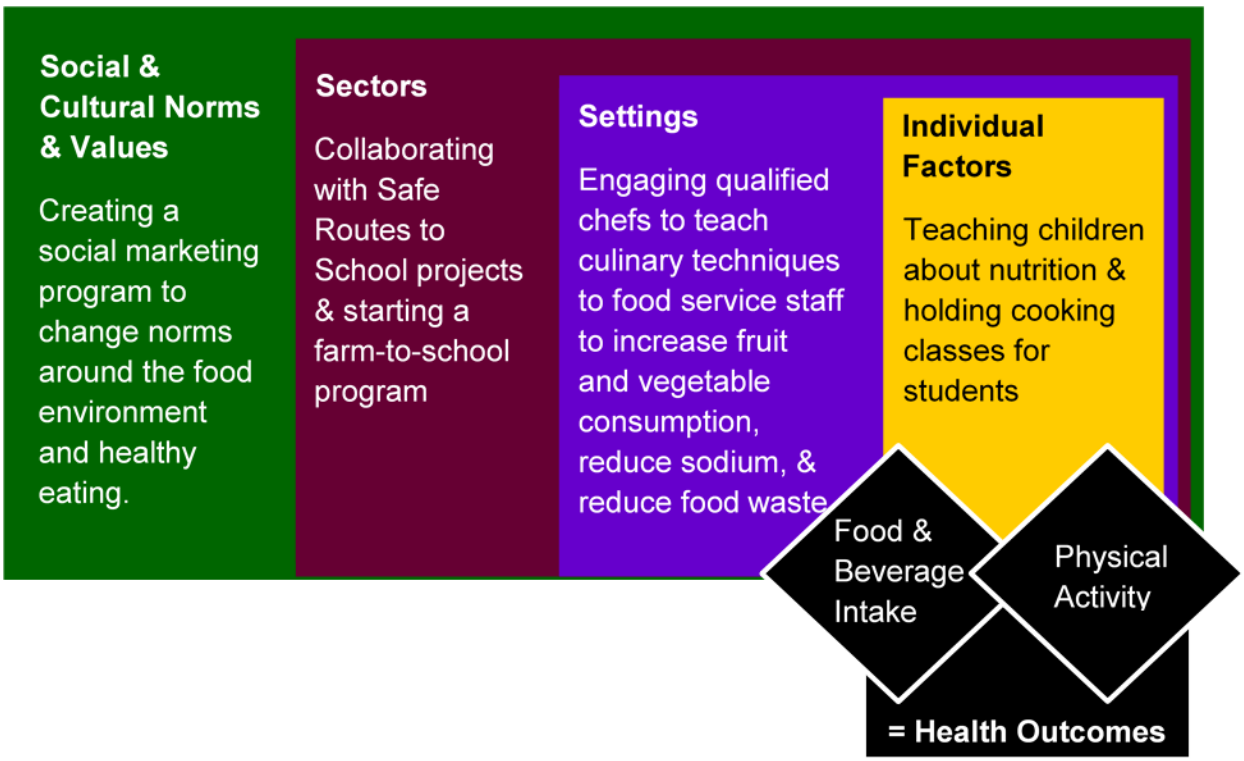
Comprehensive SNAP-Ed Projects and Plans

The Agency expects States to develop comprehensive SNAP-Ed Plans that provide a balance of all three approaches to deliver SNAP-Ed. FNS advises States that all SNAP-Ed Plans must include PSE change efforts that may be delivered through Approaches Two and/or Three.

States have opportunities to include a vast array of interventions into comprehensive SNAP-Ed Plans by using the definitions of nutrition education and obesity prevention services and an evidence-based approach, and by using the three approaches identified to deliver nutrition education and obesity prevention interventions described in the FNA. These interventions must comply with the *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, this activity would not be an allowable cost since capital expenditures are not permitted. Helping partner groups organize and plan walking trails may be an allowable SNAP-Ed expense. Promoting the walking trail and the benefits of physical activity to address weight management are SNAP-Ed allowable costs and in accord with the SNAP-Ed goals and principles.

Employing multiple approaches has been shown to be more effective than implementing any one approach. An example of implementing activities from all three approaches including social marketing and PSE change efforts in schools with a majority low-income population could include several of the following components:



As States select PSE interventions, they may choose interventions that are either research, practice-based, being implemented with a SNAP-Ed target audience or in a different setting for the first time. As mentioned in the discussion of an evidence-based approach, PSE interventions that are practice-based or being implemented in a new setting or with the SNAP-Ed population for the first time should be evaluated. FNS expects States to evaluate these PSE interventions, which can be an allowable use of SNAP-Ed funds. Once such a PSE intervention has been rigorously evaluated it would be considered a research-based intervention.

Some may question, “What is an appropriate mix of approaches and evaluation of programs to include in a balanced comprehensive SNAP-Ed State Plan?” **The mix of**

approaches will be based on the needs assessment as completed by your State, your State priorities, and your funding availability. Taken together, these can guide your State Plan development for a suitable balance of direct education, social marketing, PSE efforts, and evaluation. States should recognize that the selected mix may increase the need to engage additional partners when implementing interventions or conducting evaluations. Further assessment of comprehensive programming will contribute to determining an effective ratio of approaches and evaluation.

Coordination and Collaboration Requirements

In conformance with the FNA, States may coordinate their SNAP-Ed activities with other publicly or privately funded health promotion or nutrition improvement strategies. Considering that SNAP-Ed funds are capped, States may be able to leverage SNAP-Ed financial resources with funding of other organizations with complementary missions to reach SNAP-Ed eligible individuals through multiple channels and varied approaches to increase effectiveness and efficiency.

States must continue to show in their SNAP-Ed 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. When SNAP-Ed funds are used, States must describe the relationship between the State agency and other organizations with which it plans to coordinate the provision of services, including statewide organizations. States should formalize these relationships through Memoranda of Agreement/Understanding or letters of support or commitment. Copies of contracts and Memoranda of Agreement/Understanding that involve funds provided under the State agency's Federal SNAP-Ed grant must be available for inspection upon request.

FNS expects States to coordinate SNAP-Ed activities with other national, State, and local nutrition education, obesity prevention, and health promotion initiatives and interventions, whether publicly or privately funded. States must consult and coordinate with State and local operators of other FNS programs, including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the National School Lunch Program, Farm to School, and the Food Distribution Program on Indian Reservations to ensure SNAP-Ed complements the nutrition education and obesity prevention activities of those programs. States are encouraged to coordinate activities with other Federally-funded low-income nutrition education programs, such as the EFNEP and the CSFP. States are required to describe their coordination efforts in their SNAP-Ed Plans following the instructions contained in *Section 2 – The SNAP-Ed Plan Process*.

Data Exchange Guidance

7 CFR §272.1(c)(1), provides the limited circumstances where State Agencies may disclose information obtained from SNAP applicant or recipient households. These

provisions permit the disclosure of this information to those directly connected with the administration of SNAP, including SNAP-Ed.

For the purposes of SNAP-Ed, this applies to the sharing of SNAP participant data between States and Implementing Agencies. All agencies must adhere to protections for all SNAP applicant or recipient household data, which may be used to identify individual SNAP applicants or recipients, also known as personally identifiable data (PII). Participant data must be stored and exchanged using encrypted servers. All individuals who will be handling PII must be trained on secure access and use and must annually sign a document stating that they understand their responsibilities.

State and Implementing Agencies must establish a data exchange agreement before data can be shared. These agreements are not part of the State Agency's Plan of Operation and must specify the following:

- Data to be exchanged using encrypted servers
- How data will be stored and who will have access
- Training procedures for individuals who will be handling PII
- Procedures used to exchange the data between the two entities
- Steps to be taken in case of a data breach
- Steps to securely destroy data 90 days after it is no longer in use

Data exchange examples

Use of participant data for program evaluation

The Oregon Department of Human Services (OR DHS) contracted with Oregon State University (OSU) extension for outcome evaluation of their Food Heroes project. The evaluation consisted of a phone survey with a goal sample size of 300-400 participants per county in four counties. These phone surveys paired with baseline data collected in the same areas to allow for comparison. Phone surveys were used to gain more responses than would have been possible with paper and online surveys. Subjects were recruited using a list of Oregon SNAP participants provided by OR DHS, which included household members' names, addresses, phone numbers, and household composition. All SNAP participants in county zip codes first received a direct-mail notification so that they were aware that they could be contacted to participate in the survey. A random sample of participants from each zip code was contacted without tracking individuals.

The OR DHS confirmed that their agreement with OSU contained a confidentiality clause at both State and local levels. Privacy statements were required to be posted in offices located in surveyed counties.

Contract language for exchange of data

Rhode Island Department of Human Services entered into a contract with Brown University's Rhode Island Innovative Policy Lab to provide contact data, including full name, address, phone number, and email address for SNAP clients, for a pilot survey of food insecurity across the State. A contract was developed and clearly described the data to be used, how it would be used, along with a Mitigation Plan. The Mitigation Plan defined what conditions would constitute a data breach and the steps to be taken if such a breach of SNAP participant PII data occurred as well as who would be responsible for each of these steps. Mitigation Plan steps included lead time for notification and initiation of an investigation of a suspected breach, procedure for outside allegations of a breach, agencies for cooperation, Corrective Action Plan activities, and destruction of participant data. Liabilities were also described. This agreement was approved and signed prior to any exchange of participant data.

Opportunities for Collaboration with SNAP-Ed

Non-profit Hospitals

One collaboration opportunity is with non-profit hospitals, which provide services to low-income individuals in need of medical care which may stem from diet-related diseases. They have a strong history of supporting and promoting USDA food programs like WIC, providing access to summer meals, using their dietitians to teach healthy eating in schools, and providing support or locations for SNAP-redeeming farmers markets.

State Nutrition Action Councils (SNAC)

About 10 years ago, SNAC were established in FNS Regions to maximize nutrition education efforts and improve coordination and cooperation among the State agencies, FNS nutrition assistance programs, public health agencies, and EFNEP. SNAC are now primarily comprised of representatives from FNS programs who develop statewide nutrition education plans across programs. The plans focus on one or more common goals, promote collaboration, and use integrated approaches to connect effort and resources. A number of States still effectively operate SNAC or similarly named groups today. SNAC can serve as a model for coalescing State programs around nutrition education and obesity prevention efforts. Several States have established SNAP-Ed Advisory Committees that include representatives from the FNS nutrition assistance programs but have the SNAP State agency taking the lead role. FNS encourages States to engage in these types of collaborative efforts.

In FY 16, each FNS Regional Office was charged with establishing a new SNAC (or similar council) in one State with a high obesity rate, as defined by the CDC, to align nutrition and obesity prevention activities across programs. These new collaborations seek to expand the stakeholders to include interested public, private, and non-profit groups and programs to develop a State Nutrition and Food Systems Plan. The Plan

identifies State priorities to combat food insecurity, diet-related disease, and obesity that can help serve as a needs assessment for State SNAP-Ed Plans. It is appropriate for SNAP-Ed to help fund these pilots and subsequent efforts in the pilot or other States. These groups are encouraged to use the SNAP-Ed Evaluation Framework as a tool to help plan and evaluate SNAC and State level partnerships. States may find out more about initiating and sustaining these types of collaborative efforts by consulting with their FNS Regional SNAP-Ed Coordinators.

Related State- and Federally-Funded Programs

States also are expected to coordinate activities and collaborate with community and State Departments of Health, Agriculture, and/or Education implementation of related State- and Federally-funded nutrition education and obesity prevention projects. Such collaboration provides the capacity for SNAP-Ed to meet its goal and remain consistent with the FNS mission, while reaching low-income families and individuals through multiple spheres of the SEM.

Indian Tribal Organizations

FDPIR provides USDA foods to income-eligible households including the elderly, those living on Indian reservations, and Native American families residing in approved areas near reservations and in the State of Oklahoma. Because persons eligible for SNAP may participate in FDPIR as an alternative to SNAP, FDPIR participants are considered eligible to receive SNAP-Ed. FNS encourages States to work with FDPIR program operators and nutritionists to explore avenues to increase nutrition education funding and resources in FDPIR communities and optimize them to provide the greatest benefit to FDPIR participants.

FNS requires States to consult with Tribes about the SNAP State Plan of Operations, which includes the State SNAP-Ed Plan. States must actively engage in Tribal consultations with Tribal leadership or their designees, as required by SNAP regulations at 7 CFR 272.2(b) and 272.2(e) (7). FNS reminds States of this requirement as it relates to SNAP-Ed. The consultations must pertain to the unique needs of the members of Tribes.

FNS also expects States to consider the needs of Tribal populations in conducting their needs assessments for SNAP-Ed and to consult and coordinate with State and local operators of FDPIR. FNS encourages States to ensure they make every effort to include a focus and devotion of resources to Tribal nutrition education. States should seek out FDPIR programs to help foster relationships at the Tribal level with SNAP-Ed, as well as local health departments and university extension programs to help with on-site nutrition education implementation, especially organizations that may be submitting proposals to the State to receive SNAP-Ed funding.

SNAP-Ed State and local contact information for FDPIR programs is available from FNS Regional Office SNAP-Ed Coordinators or through the SNAP-Ed Connection at https://snaped.fns.usda.gov/state-contacts. Examples of collaborative activities with Indian Tribes and SNAP-Ed include:

- An implementing agency working with communities in urban and rural tribal areas to develop culturally relevant and resonant materials, such as recipes using traditional foods like bison
- A university and a Tribal Nutrition Services Program developing a video demonstrating healthy, culturally relevant cooking recipes for television or internet use
- SNAP-Ed engaging with Indian Health Services and local clinic staff to create system changes, such as encouraging and providing recommendations for physical activity. The project includes having youth conduct a map-based community assessment of the ease or difficulty with which residents can lead healthy lifestyles
- Direct nutrition interventions like food demonstrations, cooking classes, or brief interactive educational interventions
- Nutrition education classes on general nutrition, infant nutrition, food safety, food resource management, encouraging more fruits and vegetables, etc.
- Staff working with Tribal community volunteers to plant a kitchen garden at an FDPIR program site

CDC-Funded Grant Programs

FNS recommends that State agencies explore and engage in collaborative opportunities with CDC-funded obesity prevention grant programs in their State. CDC funds agencies that may be potential partners and are already working to improve nutrition and prevent obesity through evidence-based PSE change initiatives in States and communities. SNAP-Ed providers could potentially partner with CDC grant awardees on nutrition and physical activity initiatives. Additional information from CDC about overweight and obesity is available at http://www.cdc.gov/obesity/.

Collective Impact

States also may wish to consider other promising solutions to organize around delivering and achieving their program objectives. A promising approach to increase effectiveness is to move from an isolated impact approach to a collective impact approach. Collective impact is fundamentally different in that it offers more discipline, structure, and higher-performing approaches to large-scale social impact than other types of collaboration. In its partnership role, providing backbone support for such partnerships may be a powerful way for SNAP-Ed providers to achieve nutrition education and obesity prevention objectives. Likewise, SNAP-Ed providers may find that participating in such collective efforts best suits their programs.

Isolated impact is an approach oriented toward finding and funding a solution embodied within a single organization, combined with the hope that the most effective organizations will grow or replicate their impact more widely.

Collective impact is the commitment of a group of important actors from different sectors to a common agenda for solving a specific social problem. The five conditions of successful collective impact initiatives are:

1. *A common agenda*
2. *Shared measurement systems*
3. *Mutually reinforcing activities*
4. *Continuous communication*
5. *Backbone support organizations*

To learn more about collective impact, visit https://ssir.org/articles/entry/collective_impact

SNAP-Ed Roles and Responsibilities

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 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 collaboration across programs and planning at State and local levels to ensure implementation of consistent and effective interventions.
- Consults with the Director of the CDC as well as 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 and PSE materials for use with the SNAP-Ed target audience.
- Oversees the collection and analysis of national SNAP-Ed data.
- Incorporates the current DGA and the related 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 based on a State-specific needs assessment of diet-related disease and addresses national and State priorities while linking 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 coordinated, cohesive annual SNAP-Ed performance report to FNS each year.**
- **Monitors implementation of the State's approved SNAP-Ed Plan, including allowable expenditures. New:** State agencies should be monitoring performance of implementing agencies which, at a minimum, includes a review of financial integrity to ensure:
  - Proper documentation and identification of costs.
  - Proper allocation of costs.
  - Account for any program income.
  - Appropriate time and effort documents are kept.

  FNS also encourages State agencies to participate in observations of nutrition education activities to ensure activities are delivered in accordance with the SNAP-Ed Guidance and efforts are targeted toward SNAP-Ed eligible audiences. It is recommended that observations be conducted annually. The review of financial integrity and observation of nutrition education activities may be completed as part of the State ME process. **End of new material.**
- 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.

SNAP-Ed Implementing Agency / Local 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. The Plan addresses State-specific SNAP-Ed population needs as well as national/State priorities 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.
- Coordinate and collaborate with other State and local 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.
- Delivers nutrition education and obesity prevention strategies and interventions 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 evidence-based PSE strategies and interventions to reach the SNAP-Ed population.
- 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.

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

Section 2: Writing Your SNAP-Ed Plan & Annual Report

This section describes the requirements for SNAP-Ed Plans based on the provisions of the Food and Nutrition Act of 2008, as amended, under Section 28. The section also includes guidance on the development and submission of SNAP-Ed Plans and Annual Reports.

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 multi-year Plan of up to 3 years.
- Include a table of contents and executive summary.
- Identify the methods the State will use to notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities. As an example, States may inform potential SNAP-Ed participants through linkages and referrals with facilities and programs that serve the low-income population, such as county offices, food banks, public housing, or public assistance offices, etc., by providing information on bulletin boards or through electronic media.
- Describe methods the State agency will use to identify its target audience. States may propose State-specific targeting strategies and supporting data sources.
- Include a needs assessment of the nutrition, physical activity, and obesity prevention needs of the target population in addition to barriers to accessing healthy foods and physical activity. State agencies should make certain that the needs assessment considers the diverse characteristics of the target population.
- Ensure that interventions are comprehensive in scope and appropriate for communities and the eligible low-income population. The interventions must recognize the population's constrained resources and potential eligibility for Federal food assistance.

REFER TO THE OVERVIEW SECTION FOR A DEFINITION OF THE SNAP-ED ELIGIBLE AUDIENCE.

- Describe the evidence-based nutrition education and obesity prevention services it will provide and how the State will implement those services, either directly or through agreements with other State or local agencies or community organizations.
- Show how the interventions and strategies meet the assessed nutrition, physical activity, and obesity prevention needs of the target population.

- Include activities that promote healthy food and physical activity choices based on the most recent *DGA*.
- Include evidence-based activities using two or more SNAP-Ed approaches, including individual or group-based direct nutrition education, health promotion, and intervention strategies with one or more additional approaches.

REFER TO THE OVERVIEW SECTION FOR A DETAILED EXPLANATION OF THE SNAP-ED APPROACHES.

- Provide a description of the State's efforts to consult and coordinate activities with publicly or privately funded national, State, and local nutrition education and health promotion initiatives and interventions, including WIC, the CNPs, FDPIR, and EFNEP. States must consult and coordinate with State and local operators of other FNS programs. The State must describe the relationship between the State agency and coordinating organization(s).
- Present 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. As part of the budget process, inform FNS by the end of the first quarter of each Federal fiscal year (December 31) of the amount of its prior year allocation that it cannot or does not plan to obligate for SNAP-Ed activities by the end of the Federal fiscal year.
- Provide additional information as may be required about the nutrition education and obesity prevention strategies and interventions selected along with characteristics of the target population served. This will depend on the content of the State's SNAP-Ed Plan and is necessary to determine whether nutrition education and obesity prevention goals are being met.
- Submit a SNAP-Ed Annual Report to FNS by January 31 of each year. The report must describe SNAP-Ed Plan project activities, outcomes, and budget for the prior year.

State Agency Liability

For SNAP

State SNAP agencies must submit a SNAP-Ed plan by August 15 for approval. Plans may be submitted earlier to facilitate the review and approval process to assure continuity of program efforts. 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's 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.

SNAP regulations at 7 CFR 272.2(b) and 272.2(e)(7) require States to actively engage in Tribal consultations about the SNAP State Plan of Operations, which includes the

SNAP-Ed State Plan. The consultations must pertain to the unique needs of the members of Tribes.

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. State agencies shall provide program oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts.

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.

Record Retention Requirements and Management

According to 7 CFR 272.1 (f) SNAP regulations require that all records be retained for 3 years from fiscal closure. This requirement applies to fiscal records, reports and client information held by the SNAP State agency and all sub-grantees. 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.

Timeline for Plan and Annual Report Submission and Approval

Date	Action
January 31	Due date for Annual Report for previous fiscal year
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 multi-year Plans for the coming fiscal year
October 1	Approval date or Regional Office response to States on Plan
December 31	Provide status of prior year allocation
December 31	Due date for submission of EARS data through FPRS online system

Instructions for Submitting the State SNAP-Ed Plan and Annual Report

- Submit one single SNAP-Ed Plan and annual report per State that will incorporate all SNAP-Ed implementing agencies and local providers that participate. The Plan should include one unified section describing the identified health-related nutrition and physical activity needs of the SNAP-Ed population in the State as well as 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 for each project in addition to a State summary for each of these items.
- Provide clear and concise descriptions and justifications for requested items.
- Use the 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 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 and budgetary information is accurate.
- 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 or significantly revised activities to the FNS Regional Office by May 1.
- Complete the Education and Administrative Reporting System (EARS) Form #759, OMB No. 0584-0594, by December 31.
- Concisely describe the outcomes of projects, including evaluation findings where indicated, and submit the previous year's annual report to the FNS Regional Office by January 31.

The Plan should be submitted as an electronic document either as a Microsoft Word document or Adobe Portable Document Format (PDF) file that is submitted electronically to the Regional SNAP-Ed Coordinator. 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 Multi-Year Plans

States may submit an annual or multi-year Plan. Multi-year Plans may cover a two or three year period. A multi-year Plan must demonstrate the flow of program activities in a logical and sequential manner with each year building upon the preceding year. FNS recommends that States consider developing multi-year SNAP-Ed plans as they propose implementing nutrition education and obesity prevention activities that use a variety of approaches and incorporate PSE change interventions. States may find that planning, implementing, evaluating, and showing progress on these interventions may be better reflected over time using a multi-year plan.

In developing an annual or multi-year SNAP-Ed Plan, States must use the recommended Plan templates located in the appendices to guide the process, helping to ensure that all requested information is concise and accurate. Additional guidance on multi-year plan templates is provided later in this section under *Multi-Year Plan Templates*. Regional SNAP-Ed Coordinators may request alternate or supplementary templates or forms for State completion to meet Regional needs (see Appendix B). The templates are fillable forms when downloaded from the SNAP-Ed Connection. This should expedite preparation of Plans and ease subsequent review and approval.

To determine whether to approve a State's multi-year Plan, FNS will consider a State agency's:

- inclusion of a limited number of clear, concise, and well-written target population health-related nutrition and physical activity goals and objectives;
- 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 multi-year Plan.

States may be limited to a 1-year Plan if they are experiencing ongoing problems. State requests to submit a multi-year 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 multi-year Plans. Budget information, EARS data and Annual Reports are submitted for each year of a multi-year plan.

Template 1: Identifying and Understanding the Target Audience

Definition of Target Audience in SNAP-Ed Plans

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; parents ineligible for SNAP who receive SNAP benefits on behalf of their children; and SNAP participants in a SNAP Job Readiness Training Program. Members of Indian Tribal Organizations participating in FDPIR also are eligible for SNAP-Ed. See *Coordination and Collaboration Requirements in Section 1*.

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

Income: Persons eligible for other means-tested Federal assistance programs such as Supplemental Security Income (SSI), the WIC Program, or 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.

Qualifying locations: Persons at qualifying locations that serve low-income individuals, such as food banks, food pantries, soup kitchens, public housing, and SNAP/TANF job readiness program sites, and other such sites.

> **SNAP-Ed eligible individuals** refers to the **SNAP-Ed target audience**, specifically SNAP participants and other low-income individuals who qualify to receive SNAP benefits or other means-tested Federal assistance programs. It also includes individuals residing in communities with a significant (50 percent or greater) low-income population. The term "**means-tested Federal assistance programs**" for the purposes of this Guidance is defined as Federal programs that require the income and/or assets of an individual or family to be at or below 185 percent of the Federal Poverty Guidelines in order to qualify for benefits. There may be additional eligibility requirements to receive these programs, which provide cash and noncash assistance to eligible individuals and families.

Locations serving low-income populations: Persons at other 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, residents, schools, or childcare centers 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. Also see the community eligibility provision for schools under "Description of the State's target audiences."

Retail locations serving low-income populations: 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-Ed. FNS recognizes that SNAP recipients do not necessarily shop at the stores that are closest to where they live. Census tracts in some cases may not be the right measure. 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. When SNAP-Ed receipts are less than $50,000 monthly, a store may be show average monthly SNAP redemptions that are significant compared to overall sales or some other indication that the low-income population shops at that location.

Needs Assessment

In Section A of the Plan, the Needs Assessment must:

- Be valid and data-driven;
- Present the nutrition, physical activity, and obesity prevention needs of the target population as well as their barriers to accessing healthy foods and physical activity;
- Consider the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, transportation/mobility needs, and other factors;
- Consider the needs of Tribal populations and make efforts to include a focus and devotion of resources to Tribal nutrition education;
- Indicate why specific population segments were chosen for intervention(s), such as need; trends; readiness for change; availability of effective interventions with sufficient reach and expected impact; and likely partners.

The results should capture information on whether services are already being delivered 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 1*.

Needs Assessment Methodology

Concisely describe and justify your methodology for assessing the population health-related nutrition and physical activity needs of the State target audience.

***Existing Information:* First review existing information.** Organizational partners should be considered as a source of relevant data. Pertinent findings from organizational partner information reviews should be included in SNAP-Ed Plans. If the State conducted a needs assessment of the same target audience in the last few years, the results should be reviewed and updated as necessary. Resources may include State-specific information about diet, physical activity, and related health conditions, such as diabetes, cancer, cardiovascular disease, and obesity. National surveys that report State-specific information include the Behavioral Risk Factor Surveillance System at http://www.cdc.gov/brfss, the National Survey of Children's Health at http://www.childhealthdata.org/learn/NSCH, and the State of Obesity at http://stateofobesity.org/resources/. The SNAP-Ed Evaluation Framework Interpretive Guide will provide more details about using different data sources for SNAP-Ed planning and evaluation.

***New Information Collection:* 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.

Needs Assessment Findings

When available, the following information should be addressed in this section of the Plan:

Demographic Characteristics of the SNAP-Ed Target Audience: If information is available, discuss geographic location, race/ethnicity, tribal status, age, gender, family composition, education, and primary language. 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; poverty rates; geographic areas or neighborhoods serving qualifying schools; location of public housing; race/ethnicity, age, gender, family composition, education, and primary language. The Bureau of Census data may be found under Geographies at American FactFinder at http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t.

Current and projected obesity rates and diet-related health conditions for the State or target population should 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 State of Obesity report at http://stateofobesity.org and in particular its state-by-state data on that Web page and at http://stateofobesity.org/states/, which may be helpful to States in developing their Plans.

Another relevant source is the Community Health Needs Assessments (CHNA) required under the Affordable Care Act. A CHNA toolkit is available at http://assessment.communitycommons.org/CHNA/.

CDC links to their obesity data and related information are available at https://www.cdc.gov/obesity/data/childhood.html and https://www.cdc.gov/healthyschools/index.htm.

CDC State Indicator Reports, strategies, data, fact sheets, social media tools, and resources on physical activity are located at http://www.cdc.gov/physicalactivity/resources/reports.html

2015 County Health Rankings may be found at http://www.countyhealthrankings.org/.

States may propose targeting methodologies and alternate data sources to identify their target audience for all SNAP-Ed efforts. Examples of alternate targeting methodologies for determining the SNAP-Ed target population that have been approved are described below. FNS recommends that States consult with their Regional SNAP-Ed Coordinators as they consider alternative methodologies.

Geographic Information System (GIS) Mapping: In rural or frontier areas, urban residential areas that are economically intermixed, and in certain island States and territories, there may be few or no census tracts with more than half of residents within 185% of the Federal Poverty Level (FPL). States have used GIS mapping to identify census designated places (CDPs), which are concentrations of a population that are recognized by name but are not legally incorporated as cities, towns, or other jurisdictions as defined by the State. One State compared the low-income population in the 10 largest CDPs to the overall State population to identify which CDPs have the greatest percentage of low-income residents for SNAP-Ed programming. Here are some mapping tools that may be useful followed by their relevant links:

- Capacity Builder: This map is a capacity builder that is meant for FNS staff, State agencies, and partners to use to conduct needs assessments and planning. The Capacity Builder allows users to identify areas of need using the percentage of Free and Reduced Price (F/RP) children eligible under the School Meals Program in each census block group. The need can also be assessed by the total number of eligible children in a block group, which can also help to estimate the number of meals needed in each area. Finally, certain traditionally underserved areas can be identified such, as Strikeforce counties, Tribal lands, and land on or near military bases. Once need is assessed, potential partners and site locations can be identified. Users can

add information like public and private schools, universities, school districts, Rural Development and HUD housing, libraries, and churches. http://cacfpsfsp.maps.arcgis.com/apps/OnePane/basicviewer/index.html?appid=d37b85538642426c903758752132da69

- The USDA ERS Food Environment Atlas: The Atlas has SNAP-authorized retailers and farmers markets that report accepting SNAP (and WIC). It also includes Socioeconomic and Health characteristics including obesity rates. http://www.ers.usda.gov/data-products/food-environment-atlas/go-to-the-atlas.aspx
- The UDS Mapper: The UDS Mapper is a comprehensive tool that can be daunting as it contains a lot of data. The Mapper has sliders for threshold levels of interest (i.e. percent of population at or below 100 percent FPL). Unfortunately there is no pre-set slider for 185 percent. The Mapper is free, but requires registration. http://www.udsmapper.org/

- Other resources:
  - http://www.policymap.com/maps
  - https://engagementnetwork.org/map-room
  - http://factfinder2.census.gov/
  - http://www.communitycommons.org/
  - https://www.healthlandscape.org/

Community Eligibility Provision (CEP): The CEP provides an alternative to household applications for free and reduced price meals in local educational agencies (LEAs) and schools in high poverty areas. To be eligible, LEAs and/or schools must: meet a minimum level (40 percent) of identified students for free meals in the year prior to implementing the CEP;

- agree to serve free lunches and breakfasts to all students;
- not collect free and reduced price applications from households in participating schools;
- and agree to cover with non-Federal funds any costs of providing free meals to all students above amounts provided in Federal assistance.

These schools would be eligible for SNAP-Ed. SNAP-Ed providers implementing this targeting strategy should consider the resource and staffing limitations inherent in providing SNAP-Ed at all eligible schools.

Worksite Wellness Initiatives: To deliver worksite wellness programs, SNAP-Ed providers can work with Human Resource (HR) staff to ensure that 50 percent of the employees at the worksite are at or below 185 percent FPL. The Bureau of Labor Statistics maintains a website with mean and median wages for different occupations at https://www.bls.gov/oes/current/oes_nat.htm. States can use this website to identify which types of occupations would most likely fulfill SNAP-Ed eligibility requirements. One State used data from the American Community Survey and Bureau of Labor Statistics to determine an hourly wage that would equate to no more than 185 percent

FPL for an average SNAP household with at least one member who earns income. More than half of workers must earn annual wages comparable to 185% of the FPL for the State to qualify for SNAP-Ed programming. Worksites would be required to complete a form verifying the site's eligibility using this method. States may also choose to identify a minimum number of employees per worksite to justify the time, effort, and cost necessary to implement a multi-component worksite wellness program.

Social Marketing Outdoor Advertising Program: Because of the rural nature of certain States, the use of census tracts to qualify social marketing activities for the low-income audience is not cost efficient for population reach. One State developed a targeting methodology for the outdoor advertising component of its social marketing program. The State used a free on-line mapping tool to identify locations of proposed billboards within 1,800 yards of SNAP-Ed qualifying schools and grocery stores, which are complementary channels for their social marketing program.

County Fair - Pro-rating Expenses: Certain annual events, such as a State or County Fair, may not be located in low-income areas but have the potential to reach a large number of SNAP-Ed participants and other low-income persons. A State submitted a plan for a pro-rata share of SNAP-Ed funds to pay for the specific costs that would benefit the SNAP-Ed eligible population at the event. FNS calculated a weighted average of the percentage of residents in three target neighborhoods within 130 percent of the FPL, or the gross income required to confer SNAP eligibility.

Links provided above for Needs Assessment are summarized on the SNAP-Ed Connection https://snaped.fns.usda.gov/.

State-Specific Diet-Related Health Statistics on Target Population: Define the nutrition/physical activity behavioral and lifestyle characteristics of the State target audience. If available, provide State-specific data on obesity and diet-related diseases for the target population(s). Examples of characteristics that may enhance the ability to develop, target, and deliver appropriate 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.

Other Nutrition-Related Programs Serving Low-Income Persons: Describe the availability of other nutrition and/or physical activity programs, services, and social marketing campaigns that target low-income populations in the State. Examples include WIC, Team Nutrition, CNP, FDPIR, EFNEP, food banks, public health services, and obesity prevention programs funded by governmental organizations, such as the CDC or privately funded groups such as the Robert Wood Johnson Foundation. Team Nutrition is an initiative of FNS to support the CNPs through training and technical assistance for foodservice, nutrition education for children as well as their caregivers,

and school and community support for healthy eating and physical activity. Team Nutrition makes resources available to schools and childcare at http://healthymeals.fns.usda.gov/. Having information about the work of others that serve a similar population may help to identify potential partners for collaboration and avoid duplication of existing services.

Areas of the State Where SNAP Target Audience is Underserved or Has Not Has Access to SNAP-Ed Previously: Identify what efforts will be undertaken to address and build long-term capacity in underserved areas.

Implications of Your Needs Assessment and How These Findings Were Applied to this Current Year's SNAP-Ed Plan: Provide a brief summary of the implications of the needs assessment findings and explain how the State applied the needs assessment to the current year's SNAP-Ed Plan.

Template 2: Goals, Objectives, Projects, Campaigns, Evaluation, and Coordination

Identify the State's goals and objectives for SNAP-Ed and the methods it will use to achieve them. These should be consistent with the needs assessment and the current availability of other nutrition education and obesity prevention services.

State Agency Goals and Objectives: Identify your State's 3-5 goals and related objectives based on the needs assessment and current availability of other services. Goals should be population-based and health-related, focusing on nutrition and physical activity needs. They should illustrate the overall purpose of SNAP-Ed. FNS encourages States to select a limited number of behaviorally-focused, measurable objectives for each goal. 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 may include a behavioral focus as well as related process objectives. An example of a State-level process objective is the following: "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." The SNAP-Ed Evaluation Framework's Population Results indicators are a useful tool for setting goals and objectives.

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.

New: ***Reporting Progress on State-Level Goals and Objectives:***

States should describe how they are planning to electronically collect evaluation data that indicates progress towards State-level goals and objectives. States should indicate what data they are using to assess progress towards each goal, and how they expect implementing agencies to electronically report this information. For instance, some States may choose to use a software system where implementing agencies enter responses to specific data collection forms after an activity is completed, or they may request summary reports to be emailed to the State office on a specified regular basis, such as semi-annually. **End of new material.**

Description of Projects/Interventions: Select and describe the planned nutrition education and obesity prevention projects, strategies, and interventions that support goals and objectives listed in number 1 and how these meet the assessed nutrition, physical activity, and obesity prevention needs of the target population.

States must select evidence-based nutrition education and obesity prevention projects, strategies, and interventions. An effective program will use interventions across multiple levels of the SEM and/or include community and public health approaches as described under *Comprehensive SNAP-Ed Projects and Plans* in the Overview section. States may use the *SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States* to find evidence-based interventions which qualify for use in SNAP-Ed. The toolkit is not an exhaustive list and provides a sampling of interventions from which to choose. Other interventions may be allowable even if they are not currently featured in the resource.

FNS encourages States to consider applying the *Reach Effectiveness Adoption Implementation Maintenance* (RE-AIM) framework in selecting SNAP-Ed interventions. The RE-AIM framework is designed to enhance the quality, speed, and public health impact of efforts to translate research into practice. The five RE-AIM steps to translate research into action are:

The five RE-AIM steps are:

- **Reach** the target population
- **Effectiveness** or efficacy
- **Adoption** by target staff, settings, or institutions
- **Implementation** consistency, costs, and adaptations made during delivery
- **Maintenance** of intervention effects in individuals and settings over time

More information on RE-AIM can be found at: http://re-aim.org/.

For each project, strategy, or intervention provide the following:

Project Title
Related State Objective(s): Specify the objectives that the project/intervention supports. Project-level objectives should not be selected in isolation but should support State SNAP-Ed goals. Clearly state the purpose of the project.

> **Example of a project-level objective:** "By the end of the school year, students will report that they have tried at least one new vegetable grown in their school's garden."

Audience: Specify the target audience that will receive the intervention as explained in Section A: Identifying and Understanding the Target Audience. Include other relevant characteristics of the proposed audience (e.g., age, gender, etc.). Describe how the project will focus education on the SNAP target audience.

Food and Activity Environments: A brief explanation of how project delivery will focus nutrition education and obesity prevention efforts on the SNAP-Ed population. Describe how the project will reflect audience's awareness and access to healthy foods and beverages, and places to be physically active.

Project Description: Description of project implementation features, giving particular attention to the following:

- Behavioral or environmental changes
- Key educational messages
- How and where services will be delivered
- Partner organization roles and contributions
- Duration of project
- Projected total number of individuals, sites, or systems participating or reached
- For strategies that include social marketing, include the frequency of messages

Key Performance Indicators (KPIs): List the key measures/indicators of implementation or performance that you will capture or collect. Identify if these are new measures/indicators not collected in the past. An example of an implementation measure is the number of television ads 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.

Evidence Base: A brief summary of the existing evidence base or research that supports the proposed approaches and target audience. Provide the name of each project, identify the evidence level, either research- or practice-based, and cite the supporting references. (Refer to the *CHECKLIST FOR EVIDENCE-BASED APPROACHES IN*

APPENDIX E.) Indicate the extent to which prior studies demonstrate the feasibility and effectiveness of the proposed intervention methods.

> **Curriculum fidelity and modification:** Evaluation should assess whether local practitioners are implementing the evidence-based intervention with fidelity. Program fidelity means that the intervention was implemented as designed. In some cases, you may need to adapt the original evidence-based intervention to meet the needs of your target audience. Under these circumstances, it is important to document what changes were made and how they were implemented. Provide a justification for adapting or changing an identified intervention/project method or strategy.

Use of Existing Educational Materials: Provide the title, author, source, and description of existing 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. 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, CNPP, or other Federal governmental agency developed or recommended materials when possible.

Development of New Educational Materials: Identify any new materials that you plan to produce or purchase and justify the need and cost.

Evaluation Plans: FNS recognizes the importance of SNAP-Ed evaluation. Evaluation meets the reasonable and necessary standard when the evaluation:

- Is a systematic process that uses objective data to learn about the strengths and weaknesses of programs and practices
- Is essential to learn what works and how well it works so that you can direct SNAP-Ed resources to the most effective programs. Evaluation is needed for effective project/program management, efficiency, and accountability
- Data obtained is important as part of a continuous improvement cycle to enhance SNAP-Ed interventions over time
- Can help achieve greater positive impact on the nutrition and health of low-income individuals, families, and their communities
- Includes a description of the proposed activity
- Status and available results are included in annual reports

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 that 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 in *NUTRITION EDUCATION: PRINCIPLES OF SOUND IMPACT EVALUATION* at http://www.fns.usda.gov/nutrition-education-principles-sound-impact-evaluation.

- **Formative:** Involves pre- and ongoing testing of consumer and intermediary elements within program delivery, including messaging, consumer communication materials, training and intervention aids, and evaluation instruments. May be used to adapt elements of an existing evidence-based intervention to a new audience, geographic area, or setting.
- **Process:** Can involve such measures as tracking the number of materials distributed, counting the number of clients reached, effectiveness of alternate methods of delivering services and/or barriers to implementing the intervention; helps to assure fidelity that an evidence-based intervention is delivered as designed and thus likely to result in the expected outcomes;
- **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' behavior.

For more information about evaluation, see *APPENDIX C* of this SNAP-Ed Guidance and the following with their associated links:

- FNS's SNAP-Ed Evaluation Framework and Interpretive Guide https://snaped.fns.usda.gov/national-snap-ed/snap-ed-evaluation-framework-and-interpretive-guide
- Nutrition Education: Principles of Sound Impact Evaluation http://www.fns.usda.gov/nutrition-education-principles-sound-impact-evaluation
- Evaluation section of SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States https://snapedtoolkit.org/framework/index/
- Evaluation and Related Resources, Journal of Nutrition Education: 33, Supplement 1, 2001
- Evaluating Social Marketing in Nutrition: A Resource Manual http://www.fns.usda.gov/sites/default/files/evalman-2.PDF
- WIC Evaluation Resource Guide http://www.fns.usda.gov/wic-evaluation-resource-guide
- Addressing the Challenges of Conducting Effective SNAP-Ed Evaluations: A Step-by-Step Guide https://www.fns.usda.gov/sites/default/files/SNAPEDWaveII_Guide.pdf

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. States

may consider conducting impact evaluations with partners to assist in cost sharing. They also may submit proposed impact evaluations to their respective Regional SNAP-Ed Coordinators for consideration of related costs.

The impact assessment should meet the criteria described in the FNS Principles of Sound Impact Evaluation found at http://www.fns.usda.gov/nutrition-education-principles-sound-impact-evaluation. The Agency requests descriptions of all proposed evaluation activities. For each evaluation, please indicate:

Name: Project(s) or interventions with which it is associated.

Type: Indicate if the evaluation is primarily a formative, process, outcome, or impact assessment.

Questions: The question(s) to be addressed by the evaluation: Provide approaches and planned use for each evaluation question.

Approach: The approach(es) used to conduct the evaluation, including scope, design, measures, and data collection.

Planned Use: Describe the plans for how the results will be used.

Prior Evaluation: Whether or not the project has been evaluated previously along with the most recent year in which the evaluation was done.

Use of the SNAP-Ed Evaluation Framework: Identify SNAP-Ed Evaluation Framework indicators that are used to help FNS track the use of these indicators.

Coordination of Efforts: Describe efforts to coordinate, complement, and supplement other FNS programs in order to deliver consistent behavior-focused nutrition and obesity prevention messages. Coordination of efforts helps States provide comprehensive multi-level interventions using community-based public health approaches to maximize the reach and potential of Federal nutrition education and nutrition assistance programs.

States must consult and coordinate with State and local operators of other FNS programs, such as WIC and CNPs, when developing their SNAP-Ed plan so that SNAP-Ed complements the nutrition education and obesity prevention activities of those programs. State the purpose of the coordination and SNAP-Ed's role. Describe how efforts avoid duplication of services, especially when two IAs are working in the same venue or jurisdiction. See details in *COORDINATION AND COLLABORATION REQUIREMENTS.*

A written agreement such as a Memorandum of Agreement or Understanding that outlines the responsibilities of all the State agencies involved in the collaboration should

be kept on file for SNAP-Ed projects delivered in coordination with another agency when funds are involved. Written agreements are required for all other 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 locally. A separate agreement for each local project implemented under it is not necessary. The State 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 have a list of all the local 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.

Template 3: Staffing

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 performs SNAP-Ed functions. It is not required that you include names of individuals in your State SNAP-Ed Plan, unless this additional detail is requested by your Regional SNAP-Ed Coordinator.

Position title: Examples include Nutrition Educator, Project Coordinator, etc. Attach a statement of work listing SNAP-Ed related job duties for each position. This should clearly show how the position supports the delivery of planned SNAP-Ed activities.

FTE's charged to SNAP-Ed: 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.

Percentage of SNAP-Ed Time Spent on Management/Administrative Duties: For each position title, provide the percentage of SNAP-Ed time the position will spend performing management/administrative duties (including training and professional development)

Percentage of SNAP-Ed Time Spent on SNAP-Ed delivery, including all approaches described in Guidance Section 1: For each position title, provide the percentage of SNAP-Ed time the position will spend on SNAP-Ed direct delivery, multi-level interventions, and community and public health approaches including PSE efforts. This information should coincide with information provided in the attached statement of work/position description.

SNAP-Ed Salary, Benefits, and Wages: For each key 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.

Retain onsite for Management Evaluation (ME) review: for each key management position title, a one page resume or curriculum vitae (CV) for the individual proposed to fill that position demonstrating relevant expertise and experience. If a person has yet to be identified for the position, please indicate that and retain such documentation once the person has been identified. CV's do not need to be submitted with your State SNAP-Ed Plan, unless requested by your Regional SNAP-Ed Coordinator.

Template 4: Budget Summary

Section A. Budget Summary for Sub-Grantee: 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 contract, grant, or agreement:

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

Section B. Project Costs: For each sub-grantee, provide the Federal cost for each planned project. Provide a detailed breakdown that includes at a minimum the following information in the table provided in *Appendix A. Template 4: Section B*. **New:** Please note the clarification of some cost categories below in order to comply with the Agriculture Improvement Act of 2018. **End of new material.**

Salary/Benefits

Contracts/Sub-Grants/Agreements. Retain copies of all contracts, sub-grants, and agreements on site for ME review.

Non-capital equipment/office supplies.

Nutrition education materials

Travel

Building space lease or rental

Cost of publicly-owned building space. ***Commercial rental space charges cannot be used for publicly-owned space.***

Maintenance and repair

Institutional memberships and subscriptions

Equipment and other capital expenditures

Total direct costs

Total indirect costs. Include both a total and the indirect cost rate. Provide assurance that the indirect cost rate is an approved rate as described in Appendix C.

Total Federal funds
Estimated unobligated balances (carry-over) from current FY to next FY, if any. Please note that funds cannot be obligated the next Federal FY if the funds are in the last year of their two-year period of performance.

New: ***Total Federal funds including unobligated balance from previous FY.*** Indicate the total amount of Federal funding to be used in your annual State plan. **This should include both current FY funding and any unobligated balance from the previous FY.** **End of new material.**

Budget narrative: Provide a budget narrative which describes all expenses listed above.
Section C. Travel: Travel requests should be identified for in-State and out-of-State purposes. Travel expenditures are a variable cost. States must justify the purpose of the travel and describe how the travel request supports the State's SNAP-Ed goals and objectives. In order to be considered for funding, the request should provide a direct and clear link to providing quality SNAP-Ed programming for the target audience. State agency as well as implementing agency staff may travel for SNAP-Ed purposes. States are reminded that they may use a portion of their SNAP-Ed allocation for State agency travel for the same purpose. Refer to Appendix C, for more information on travel. Provide the following information in the SNAP-Ed budget:

In-State Travel
Travel Purpose: Justification of need for travel, including how attendance will benefit SNAP-Ed

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

Number of staff traveling

Cost of travel for this purpose

Total In-State Travel Cost

Out-of-State Travel
Travel Purpose: Justification of need for travel, including how attendance will benefit SNAP-Ed

Travel destination (city and State)

Number of staff traveling

Cost of travel for this purpose

Total Out-of-State Travel Cost

Total travel cost which includes both in and out of State travel per project should be entered in line 5 of the budget summary (*TEMPLATE 4: SECTION B. SNAP-ED PLAN INFORMATION BY PROJECT*).

Template 5: SNAP-Ed Plan Assurances:
To assure compliance with policies described in this Guidance, the SNAP-Ed Plan should include the following assurances that:

- 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.
- Efforts have been made to target SNAP-Ed to the SNAP-Ed target audience.
- Only expanded or additional coverage of those activities funded under 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.
- Contracts are procured through competitive bid procedures governed by State procurement regulations.
- 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.
- Program activities do not supplant existing nutrition education and obesity prevention programs and, where operating in conjunction with existing programs, enhance as well as supplement them. This applies to all activities and costs under the Federal budget.

- Program activities are reasonable and necessary to accomplish SNAP-Ed objectives and goals.
- All materials developed or printed with SNAP-Ed funds include the appropriate USDA nondiscrimination statement and credit SNAP as a funding source in standard font that is easily readable.

Template 6: Signatures

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.

Multi-Year Plan Templates

Please note that any guidance given on multi-year State SNAP-Ed Plans does not guarantee their approval.

States may submit an annual or a multi-year plan for a two- or three-year period for SNAP-Ed programs. A multi-year plan must demonstrate a progression and/or flow of program activities in a logical and sequential manner with each year building upon the preceding one. For example, year one can be conducting a needs assessment and performing baseline programming and/or piloting; year two can be program implementation and evaluation; and year three can be a continuation of program expansion and further evaluation.

States should use the Plan templates located in the appendices to guide the process, while helping to ensure that all information is concise and accurate.

The chart on the following page expands on the SNAP-Ed Plan Guidance's multi-year template to be completed for year 1 of the plan cycle (the duration of the SNAP-Ed Plan) and any subsequent years (year 2; or years 2 and 3).

Template # and Content Description	Details	Year 1	Year 2 or Years 2 and 3
1: Identifying and Understanding the SNAP-Ed Target Audience	Complete and submit with the initial SNAP-Ed Plan for the cycle, assuming no changes.	Required	If Applicable
2: State Level Goals	Complete and submit with the initial SNAP-Ed submission for the cycle.	Required	Required
2: State Level Objectives	Complete three separate times, once for each year of the multi-year cycle, and submit with the initial comprehensive State Plan.	Required	Required
2: Description of Projects/interventions	States may reflect annual progression in projects/campaigns, which includes justification for implementing projects/campaigns in one region in year 1 and/or to two-three regions in year 2.	Required	If Applicable
2: Evaluation Plans	States may amend activities during the cycle. Each amendment must be included in the updated Plan.	Required	If Applicable

Template # and Content Description	Details	Year 1	Year 2 or Years 2 and 3
3: Staffing	Submit a staffing plan and narrative annually, showing changes and details for the upcoming fiscal year.	Required	Required
4: Budget Information by Project	Submit line item budgets and budget narratives annually, showing changes and details for the upcoming fiscal year.	Required	Required
5: SNAP-Ed Plan Assurances	Complete and submit each year for the full cycle.	Required	Required
6: SNAP-Ed Plan Signatures	Submit a signature page for the initial Plan and any Plan amendments.	Required	Required

Subsequent years (Year 2 and Years 2-3) submission guidelines

The Food and Nutrition Service requires an executive summary and the entire plan be resubmitted with updated changes highlighted. When submitting the multi-year plan, please send each template as a separate Microsoft Word Document file.

The executive summary should range from 2-3 pages and include an overall summary, highlights of the plan, and address the following elements:

- Program progress and overview of goals for years 2 and/or 3
- Updates on new and/or existing partnerships
- Evaluation plans
- Best practices of executive summaries can be found in the attached appendices.

Program Progression and Justification

In developing multi-year plans, States must use consistent goals for the Plan cycle. **Objectives must be progressive and reflect the dynamic nature of a multi-year project as it evolves over the years in support of the program goals.** The objectives for year 1, year 2, and year 3 must demonstrate progression and include justification for the proposed Plan cycle.

Objectives must be tied to a justification narrative and a rationale for the expanded scope. The justification should include intervention strategy (i.e., PSE, direct education, and social marketing), audience(s), sites, curricula, and projected number of workshops and contacts (indirect and direct education participants).

When including program progression, a State must demonstrate progression in objectives and activities and provide justification on how the progression timeline was established.

Example of program progression and justification:
Objective Year 1: By September 30, 2019, conduct formative research for a media campaign. Formative research includes focus groups, stakeholder interviews, and state-level and national data sets to select SNAP-Ed eligible community and cross-reference with indicators from the SNAP-Ed Evaluation Framework.

Objective Year 2: By September 30, 2020, conduct three complete Healthy Behavior campaigns that will promote common behavior change nutrition education messages targeting SNAP-Ed eligible individuals with an annual overall marketing reach of at least 25 million to include media impressions, website visitors, HTML campaign(s), and social media supporting local contractors in the five service areas of Food Systems, Active Living, School Health, Early Childhood Development, and Direct Education.

Objective Year 3: By September 30, 2021, evaluate knowledge level and implementation of the family meals program as well as engagement of multi-sector partners.

Key Steps: Develop and implement paid media campaign for Healthy Behavior, utilizing outlets such as television, radio, grocery stores (including grocery cart ads, floor clings, banners, milk case clings), and billboards to maximize reach for low income women and their children, ages 2-11.

- ***FFY 19 Focus:*** Physical Activity
- ***FFY 20 Focus:*** Family Meals
- ***FFY 21 Focus:*** Physical Activity

FFY Resources: Media programming ($25,000)

Personnel & Partners: SNAP-Ed Staff and Marketing Contractor

SNAP-Ed Evaluation Framework Indicators:

- ***Short Term: Year 1***
  - Physical Activity and Reduced Sedentary Behaviors
- ***Medium Term: Year 2***
  - MT13: Media Practices
- ***Long Term: Year 3***
  - LT3: Physical Activity and Reduced Sedentary Behavior
  - R7: Physical Activity and Reduced Sedentary Behavior
  - ST8: Multi-Sector Partnerships and Planning
  - FFY 21 Focus - Physical Activity

Budget and Staffing

When submitting multi-year plans, only the budget for the submission year should be submitted. Please refer to *TEMPLATE 4: SNAP-ED BUDGET INFORMATION BY PROJECT*.

Plan Amendments

Per 7 CFR 272.2(f) State agencies must submit amendments of approved Plans to FNS for prior approval, with supporting documentation, throughout the fiscal year, but no later than May 1 of the current fiscal year. Plan amendments are necessary whenever:

- The revision indicates the need for additional Federal funding.
- The State SNAP-Ed program budget exceeds $100,000 and there is a change in activities that results in a change of 5 percent or greater of the total program budget.
- An implementing agency SNAP-Ed program budget exceeds $100,000 and there is a change in activities that results in a change of 5 percent or greater of the total program budget.
  - This includes State reallocations of funds among implementing agencies and implementing agency reallocation of funds among subcontractors.
- Budget revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs.

Examples of changes that may require a plan amendment may include, but are not limited to, the incorporation of new environmental or public health approaches as well as significant expansion or reduction of activities. FNS recommends that States consult with their respective Regional Offices for technical assistance prior to submitting an amendment.

In amendments, States should indicate whether the request is for a new or revised project and whether funds will come from unobligated previous FY funds (carry-over) or from a 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. Submit amendments electronically to the FNS Regional Office.

Annual Report

The SNAP-Ed Annual Report that describes project activities, outcomes, and budget for the prior year must be submitted by January 31 of each year. Under extenuating circumstances, States may request to extend the deadline for the Plan Annual Report by written request to the FNS Regional Office.

Summarize the nutrition education and obesity prevention projects implemented and related achievements in the previous fiscal year. Using evaluation and outcome results, discuss the effectiveness of the SNAP-Ed projects and interventions and how they might be improved in the upcoming fiscal year. The report should describe annual and longer-term progress toward achieving objectives and otherwise synthesize accomplishments and learnings that are expected to modify current- or future-year objectives, targeting, interventions, and partnerships. States that are using the SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention Indicators are strongly encouraged to report their State outcomes for priority indicators using the Optional Template (*Reporting SNAP-Ed Priority Outcome Indicators – FNS's SNAP-Ed Evaluation Framework*) in Appendix B. This Template can be submitted as an Attachment to the Annual Report. Additional detail information about the SNAP-Ed priority indicators is available at the online *SNAP-Ed Toolkit* (https://snapedtoolkit.org/framework/index/).

Appendix A, Template 7 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 or those that may contribute meaningfully to the evidence base of SNAP-Ed activities) by providing key discussion points to include in the report in order to describe the methods and results of each approved Program objective.

Template 7: Section A. SNAP-Ed Narrative Annual Report

The SNAP-Ed Narrative Annual Report allows a State to highlight accomplishments for areas of practice and discuss areas needing improvement. The purpose of section A is to describe the State's nutrition education and obesity prevention activities implemented during the previous fiscal year. **You should consolidate all implementing agency information into one State annual report using Template 7.**

SNAP-Ed Program Overview: Provide a one page (not more than 500 words) executive summary of SNAP-Ed activities, outcomes, and progress toward SNAP-Ed goals during the reporting fiscal year. Include all of the information listed below:

Progress in achieving no more than 3-5 overarching goals.

Number of new projects implemented during the reporting year by identified primary approach (specify approach: Direct, Indirect, Social Marketing, Policy, Systems, or Environmental Change).

Number of ongoing projects that were operational during the reporting year identified by primary approach (specify approach: Direct, Indirect, Social Marketing, Policy, Systems, or Environmental Change).

Major achievements (not already addressed).

Major setbacks, if any.

Overall assessment.

SNAP-Ed Administrative Expenditures: To help FNS better understand State SNAP-Ed administrative expenditures, States should provide the percent of total administrative expenditures and dollar value of administrative expenses used for each IA in the State for each of the categories listed below. A sample calculation of percent of total administrative expenditures is as follows: Administrative expenditures for X University are $550,000. Administrative salary expenses totaled $220,000. ($550,000 / $220,000) x 100 = 40%, so 40 percent of administrative expenditures was used for administrative salaries. **New:** Please note the clarification of some cost categories below in order to comply with the Agriculture Improvement Act of 2018. **End of new material.**

Administrative salary and benefits

Administrative training functions

Reporting costs

Equipment/office supplies

Operating costs

Indirect costs (not including building space)

Building/space lease or rental

Cost of publicly-owned building space

Institutional memberships and subscriptions

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.

For each project evaluation, you will be asked to provide the associated project name, key project objectives, target audience, and evaluation type.

New: States using the *SNAP-Ed Evaluation Framework* for evaluation efforts should additionally use the *Reporting SNAP-Ed Priority Outcome Indicators – Using the SNAP-Ed Evaluation Framework* template found in *Appendix B*. **End of new material.**

For each evaluation, attach a copy of your evaluation report. The report should describe methods, findings, and conclusions of the evaluation. Each evaluation report should clearly identify the associated project name(s) on the cover or first page. Include any abstracts or information on any presentations of these findings.

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.

Other Accomplishments (Optional): States may provide a brief description of other SNAP-Ed projects that have had major impacts and are not reported in the sections above. Relevant documentation may be attached as an appendix. Potential topics for inclusion are listed below:

- Staff/partner trainings
- Conference presentations and/or other journal publications
- Curriculum development
- Partnership activities
- Case studies
- Awards

Appendices: Attach evaluation reports or abstracts of published results as appendices.

Template 7: Section B. Report Summary for Outcome and Impact Evaluations

Section B provides guidance on key information to include in the summary of evaluation results. Include the following information by project: direct education, social marketing program, and PSE efforts to ensure that the report meets the basic requirements.

Name of Project or Social Marketing Program. If multiple target audiences, interventions, and evaluations were included in the impact evaluation, list each of them by name.

Total Cost of Evaluation.
Project Goals. Identify each specific goal being assessed by the evaluation.

Evaluation Design. An impact evaluation requires comparing the people, channel or systems, or community that receive the intervention being evaluated (the treatment or

intervention group) to those who do not receive any intervention (the control group) and/or to those who receive another kind of intervention (the comparison group). Describe each of the following regarding your evaluation design.

SNAP-Ed evaluation types, with associated codes for use in your annual report, are provided below.

- **Formative Evaluation (FE)**
- **Process Evaluation (PE)**
- **Outcome Evaluation (OE)**
- **Impact Evaluation (IE)**

Evaluation participants: Describe how many units (and individuals if they were not the unit of assignment) were being evaluated.

Assignment to intervention and control or comparison conditions

Unit of Assignment: Describe the unit of assignment to intervention or control or comparison groups. 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.

Group Assignment: Describe how assignment to intervention and control groups was carried out. Be explicit about whether or not this assignment was random.

Unit Retention: Provide the percentage of participants by treatment condition (intervention and control group) that completed the intervention.

Outcome and Impact Measure(s). For each evaluation impact, describe the measure(s) used. Descriptions should indicate if the focus is on knowledge, skills, attitudes, behavior, PSE change, or something else. Each measure should be characterized in terms of its nutrition or obesity prevention focus, e.g. was a policy implemented making an improvement in a school nutrition or physical activity environment. Finally, indicate if outcome or impact data were collected through observation, self-report, or another method.

Data Collection. 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. Finally indicate if impact data were collected through observation, self-report, or another method.

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 and results that are statistically significant.

Point of Contact. Provide a contact for additional details

Reference. Reference to any other report of the evaluation. Include whether the results will be submitted for publication, and if so, to what publication.

Education and Administrative Reporting System (EARS)

The EARS Form (FNS-759) which is available on the SNAP-Ed Connection at https://snaped.fns.usda.gov/program-administration/ears-form-training is a tool used to collect annual uniform data and information on SNAP-Ed activities. Data elements collected include demographic characteristics of participants receiving SNAP-Ed benefits, intervention strategies, and partnerships developed. Data should be entered into the Food Program Reporting System (FPRS) by December 31.

The EARS form was revised in 2016 and will expire on September 30, 2019. The form was updated to better capture the number of participants reached through PSE and social marketing interventions, as well as partnerships developed.

Training information is available on the SNAP-Ed Connection at https://snaped.fns.usda.gov/program-administration/ears-form-training.

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 in a timely manner;
- Providing training and technical assistance to local SNAP-Ed providers regarding the collection of EARS data;
- Attending 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 accurate and timely EARS data at the project level to ensure that it is accurately collected and reported in the manner specified on the EARS form.

Gaining Access to the Food Programs Reporting System (FPRS) for EARS Reporting

State Agencies will have access to FPRS for entering and submitting EARS data. It is the responsibility of the State Agency to enter data into FPRS. Implementing Agencies will collect the necessary data and submit it to their State Agency for review and entry into FPRS. If a State Agency directly administers the SNAP-Ed program, the State Agency will complete the EARS Form within FPRS. To add new or change existing State or Implementing Agency to FPRS, or to add a new user, please follow the steps below.

To Add New or Update Existing Agencies

1. Complete a *State and Implementing Agency Profile Request Form*, found at https://snaped.fns.usda.gov/snap/StateGates/SNAPEdProfileRequestForm.pdf
2. **Include a start date for new agencies and changes. If removing an agency from FPRS, please include an end date.**
3. Return the completed form to the contacts provided on the form. **Be sure to copy your Regional Coordinator on the email containing the completed form.**

To Add a New User to FPRS

1. Complete an *FNS-674* (found at https://fprs.fns.usda.gov/Public/FNS-674.pdf) and *FNS-674A* (found at https://fprs.fns.usda.gov/Public/FNS-674A.pdf).
2. It is best practice to have separate individuals who will be responsible for data entry and certification of EARS data. Please speak to your Regional Coordinator if this is not a practice your State Agency is able to meet.
3. Send the completed forms to your Regional Coordinator

A new FNS-674 and FNS-674A must be completed each time a new Implementing Agency is added to FPRS. Complete and send the FNS-674 and FNS-674A after you have confirmed with your Regional Coordinator that the new Implementing Agency has been added. A user will not be able to view newly added Implementing Agencies until this has been completed.

Management Evaluation (ME) Review of State SNAP-Ed Projects

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 on-site 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.
- The State is examining and documenting the progress being made toward reaching the Plan goals.
- Administrative expenses are reasonable, necessary, and properly documented and allocated.
- States are submitting developed materials for sharing on the SNAP-Ed Connection Web site.
- States are adhering to Civil Rights and EEO requirements.

Section 3: Financial and Cost Policy

The Financial and Cost Policy Section describes policies as required by Section 28 of the Food and Nutrition Act of 2008, as amended. This section also describes the impact of these policies on various funding-related SNAP-Ed activities. Where applicable, changes have been made to comply with 2 CFR 200 - *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)*, https://www.govinfo.gov/content/pkg/CFR-2018-title2-vol1/xml/CFR-2018-title2-vol1-part200.xml.

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 approvable 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 State or local projects and show that the funding will remain under its administrative control when coordinating activities with other organizations. The State Agency must inform FNS by the end of the first quarter of each Federal fiscal year (December 31) of any portion of its prior year allocation that it cannot or does not plan to spend for SNAP-Ed activities by the end of the Federal fiscal year.

Federal Financial Participation and Allocation of Grants

SNAP-Ed 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 SNAP-Ed grant amount

While fixed amounts of funding were provided for the program years 2011 through 2017, in 2018 and beyond funding is allocated based on a formula. Fifty percent of this formula is based on a State's FY 2009 SNAP-Ed expenditures. The remaining fifty percent of this formula is based on the State's share of national SNAP participants for the previous 12-month period ending January 31. The amount is also adjusted to reflect any increases in the Consumer Price Index for All Urban Consumers published by the Bureau of Labor Statistics of the Department of Labor for the 12-month period ending the preceding June 30th.

What happens if a State must surrender unspent funds for reallocation?

FNS strongly encourages States to spend the entirety of their SNAP-Ed allocations and to spend prior year funding before beginning to spend current year funds. Per 7 CFR 272.2(d)(2)(x)(F), if a participating State agency notifies FNS that it will not obligate or expend all of the funds allocated for a fiscal year by December 31, FNS may recover the unobligated, unexpended funds. FNS will be able to reallocate these funds to other participating State agencies that have approved SNAP-Ed Plans during that fiscal year or the following fiscal year. Funds surrendered by a State will be removed from its base 2009 allocation, which is used to determine the next fiscal year funding allocation. The reallocated funds received by a State will be added to its base 2009 allocation for the next fiscal year to determine allocation.

Fiscal Recordkeeping and Reporting Requirements:

Each participating State agency must meet FNS fiscal recordkeeping and reporting requirements including the following:

1. **7 CFR 277.11(c), 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. **7 CFR 272.2 (d)(2)(xi-xii), 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, intervention characteristics, and partnerships developed.
3. **7 CFR 272.2 (d)(2)(ix), Unobligated Funds Report:** The State must inform FNS by December 31 if and how much of its prior year allocation it cannot or does not plan to obligate or expend for SNAP-Ed activities by the end of that Federal fiscal year.
4. **New: 7 CFR 272.1 (f), Record Retention:** SNAP regulations require that all records be retained for 3 years from fiscal closure. **End of new material.**

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
3. Conform to Government-wide and SNAP-specific rules for specific items of cost

What activities are chargeable to a State's SNAP-Ed allocation?

The most fundamental Federal cost principle is that a cost must be necessary and reasonable for the performance of the 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. Employing State agency staff, such as Registered Dietitians with public health training and experience or credentialed public health professionals, to plan, oversee, and/or monitor the use of SNAP-Ed funds and nutrition education and obesity prevention services.
2. Promoting and conducting physical activity interventions with members of the SNAP-Ed population in conjunction with SNAP-Ed nutrition interventions or activities. *Section 3, Physical Activity*.
3. Food-related gardening and related education for nutrition education and obesity prevention. *Section 3, Gardening*.
4. Breastfeeding promotion activities conducted in collaboration with the WIC Program. *Section 3, Breastfeeding*.
5. Collecting information for use in providing nutrition education and obesity prevention activities for the SNAP-Ed audience. Examples include but are not limited to:
    a. Simple measuring of height and weight by SNAP-Ed staff in determining BMI to prepare for discussing the prevention or management of overweight and obesity. **New:** Measurement and communication of weight status should be done with careful consideration of the sensitive and personal nature of this information. Consider if this is truly necessary for the effectiveness of the intervention, and what actions to take in order to prevent stigmatizing and alienating participants. **End of new material.**
    b. Administering dietary intake questionnaires on nutrition knowledge and behaviors.
6. Evaluating SNAP-Ed projects and interventions as described elsewhere in this Guidance.

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

1. Medical nutrition therapy. *Appendix E, Medical Nutrition Therapy*
2. Providing SNAP-Ed services to persons not eligible for SNAP-Ed.

3. Clinical health assessments of SNAP-Ed eligible individuals. Such assessments include the measurement of cholesterol, blood glucose, or iron levels.

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:

2 CFR 200.404, Reasonable & Necessary Costs: A reasonable and necessary cost is one that, in nature and cost, is one that a reasonable, prudent person would incur for that purpose. Factors to consider include:

Reasonable costs:

- Did the agency receive a program benefit that reflects the dollar amount incurred?
- Is the cost similar to market prices for comparable goods or services in that geographic area?
- What is the priority of the purchase as compared with competing demands on limited resources?
- Does the purchase carry nutrition education messages consistent with the DGAs and meet the definition for SNAP-Ed allowable costs?

Necessary costs:

- Is the good or service necessary to carry out essential functions of the program?
- Can the purchase be avoided without adversely affecting the program's operations?
- **New:** Has the agency performed an inventory of current items prior to new purchases? As may be the case with Nutrition Education Reinforcement Items (NERI).
- Has the agency significantly deviated from established practices and policies regarding the purchase? **End of new material.**
- Does this purchase duplicate existing nutrition education and obesity prevention activities in the area?

Areas that, in general, fall outside the Agency's "reasonable and necessary" criteria and would not be allowed include funding for infrastructure changes, like purchasing capital equipment or building sidewalks. Organized efforts to influence elected officials or lobbying for legislative/policy changes are not considered reasonable or necessary for SNAP-Ed. Initiatives that include educating policymakers can be appropriate.

2 CFR 200.405, Allocable Costs: A cost is allocable to SNAP-Ed if the goods or services involved are chargeable (assignable) to SNAP-Ed in accordance with the relative benefits obtained by the SNAP-Ed program. 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 program. The portion allocated to SNAP-Ed must be proportionate to the benefit SNAP-Ed received.

2 CFR 200 Appendix IV (4), Prorating Costs

A broader audience may benefit from a nutrition education effort whose cost is otherwise allowable under SNAP-Ed. In this 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 SNAP-Ed eligible individuals that will receive the activities 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 SNAP-Ed eligible, then 20 percent of the total costs may be counted as SNAP-Ed costs. FNS will consider other reasonable methodologies that States describe in their SNAP-Ed Plans for determining the proportion of the SNAP-Ed target audience that will be reached.

New: Additionally, other nutrition education and physical activity programs may share use of some costs, such as building lease or rental costs, which are allowable for SNAP-Ed. Agencies must prorate costs shared by multiple programs in a manner that reflects the proportionate benefit received by SNAP-Ed. For example, if 30 percent of the staff working in a building are SNAP-Ed staff, then 30 percent of the cost of the building lease is allocable to SNAP-Ed. Similarly, if the SNAP-Ed program uses building space for 25 percent of the time, then 25 percent of the cost of the space is allocable to SNAP-Ed. **End of new material.**

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.

Costs Requiring Prior Approval in SNAP-Ed

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.

Costs Related to State SNAP-Ed 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 as required by 7 CFR 272.2(d)(2). See instructions regarding *PLAN AMENDMENTS* in the *GUIDELINES FOR DEVELOPING THE SNAP-ED PLAN.*

Where are the Federal cost principles located?

Additional guidance can be found at the following sources:

OMB Guidance:

- 2 CFR 200 Subpart D (Post Federal Award Requirements): administrative requirements for Federal grant programs as applicable to SNAP-Ed State and implementing agencies and subcontractors.
- 2 CFR 200 Subpart E (Cost Principles): cost principles for Federal grant programs as applicable to SNAP-Ed State and implementing agencies and subcontractors.

USDA departmental regulations:

- 2 CFR 400: adopts Office of Management and Budget (OMB) guidance in parts A through F of 2 CFR 200 as USDA policy and procedure. 2 CFR 400 also provides additional guidance regarding conflict of interest.
- 2 CFR 416: administrative requirements for State and local governments;

Program-specific guidance:

- SNAP regulations at 7 CFR 277
- SNAP-Ed policy memos on the SNAP-Ed Connection at https://snaped.fns.usda.gov/program-administration/policy-memos

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

Allowable administrative costs are operational costs of carrying out SNAP-Ed in accordance with the State's approved SNAP-Ed Plan. Lists of allowable and unallowable cost items as examples appear in 2 CFR 200 Subpart E, § 200.420 through §200.475. However, the vast array of possible costs precludes giving a comprehensive list in either the OMB guidance or this Guidance. The OMB guidance states that its failure to mention a particular item of cost does not imply that the cost is either allowable or unallowable; rather, administering agencies should determine allowability on a case-by-case basis, considering the treatment or standards given in the OMB guidance for similar or related items of cost. Allowable administrative expenses include, but are not limited to:

- ***Salaries and benefits of personnel involved in SNAP-Ed and administrative support.*** All staff wages, salaries, and benefits must be computed on a reasonable hourly basis commensurate with duties being performed, or the Federal minimum hourly wages established by the United States Department of Labor.

  - The wages and salaries shall be commensurate to the task an individual is actually performing for SNAP-Ed, as opposed to reflecting other positions for which he/she is credentialed. For instance, if a doctor or physician is teaching a SNAP-Ed course as a Nutrition Classroom Educator, pay will be commensurate with the activity of nutrition education in a classroom rather than that of a physician.
  - Staff must record time as specified in this Guidance and the underlying regulations and OMB circulars. For more information, see *Documentation of Staff Time and Effort in the Financial and Cost Policy Supplement* following this section.
- ***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. For more information, see *Cost of Travel and Conference Attendance* in the *Financial and Cost Policy Supplement* following this section.
- ***Development and production of SNAP-Ed materials when no other appropriate materials exist.***
- ***Memberships, subscriptions, and professional activities.*** Costs of institution memberships in technical and professional organizations necessary to effectively implement an approved State SNAP-Ed Plan are allowable. Costs of individual memberships in such organizations for personnel that work in SNAP-Ed are not allowable. 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 and repair expenses***
- ***Indirect costs.*** See *Indirect Costs* in the *Financial and Cost Policy Supplement* following this section
- ***Nutrition Education Reinforcement Materials (NERI).*** See *Nutrition Education Reinforcement Materials* in the *Financial and Cost Policy Supplement* following this section
- ***Cost of using publicly-owned building space.*** Includes depreciation 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.

Unallowable administrative expenses include, but are not limited to:

- ***Advertising and public relations:*** Except where incurred for SNAP-Ed social marketing campaigns, 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 SNAP-Ed activities, 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 events whose likelihood or magnitude cannot be forecast with certainty. 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. **New:** 2 CFR 200.438 states that entertainment costs are unallowable "except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency." One example of this could be light refreshments as provided during SNAP-Ed staff training events. Other related costs require a "reasonable judgment" based on program purpose and why/when the activity takes place. **End of new material.**
- ***Fines and penalties:*** Includes fiscal penalties, damages, and other settlements resulting from failure to comply with Federal, State, Tribal, local or Foreign 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-Ed, 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 unallowable.

Under, 2 CFR 200 Subpart E (Cost Principles) there are some unallowable cost categories that apply to universities, in addition to those listed above:

- ***Alumni activities (2 CFR 200.424).***
- ***Commencement and convocations (2 CFR 200.429).***
- ***Legal fees that result from a failure to follow Federal, State, Tribal, local or Foreign laws:*** If certain specific conditions are met, the Federal government may allow some legal fees. (2 CFR 200.441)
- ***Housing, personal living expenses, and goods for personal use (2 CFR 200.445).***
- ***Interest (2 CFR 200.449), fund raising, and investment management (2 CFR 200.442):*** There are exceptions with prior approval but if the cost is shown, it needs to be examined in light of the exceptions.
- ***Lobbying (2 CFR 200.450).***
- ***Scholarships and student aid:*** There are exceptions that should be reviewed if these costs appear in the budget (2 CFR 200.466).
- ***Student activity costs (2CFR 200.469)***

Other Federal Policies Relevant to Administration of SNAP-Ed: Federal Royalty Rights

Under 2 CFR 200.315, 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

Financial Considerations

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 and dollar limits.

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 care 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. Costs of 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 could be difficult in this environment to clearly document costs and ensure they are charged to the correct grant or other cost objectives.

Potential Partnerships with Non-Profit Hospitals

SNAP-Ed focuses exclusively on community-based, non-medical primary prevention, while health care providers, hospitals and insurance systems typically provide secondary and tertiary prevention. Secondary prevention focuses on individuals by lowering risk factors and treating disease, while tertiary prevention aims to help individuals mitigate the effects of existing disease and disability. In some States, SNAP-Ed has partnered successfully with Federally-Qualified Health Centers, local health departments, free clinics, and other health care entities that serve SNAP-Ed audiences on primary prevention projects that include education, marketing, and PSE interventions. Medical Nutrition Therapy is part of health care delivery and may not be provided by SNAP-Ed.

Increasingly, large health systems are focusing on primary prevention as a means of slowing the rise of health care costs and preventing readmissions. The Affordable Care Act (Section 9007) community health benefits provision links hospitals' tax-exempt status to the development of a triennial needs assessment and implementation strategy. This provision applies to not-for-profit hospitals that seek Federal tax-exempt status. As a result, FNS encourages States to seek opportunities to partner with these hospitals for their support of SNAP-Ed Plans and activities. SNAP-Ed providers may identify opportunities for sustainable partnerships with these groups to identify and implement evidence-based interventions and evaluations for low-income populations. For example, hospitals could donate their dietitians' time to help schools teach healthy eating, become sites for summer meals, or farmers markets. For more information on this process States may refer to CDC's Resources for Implementing the Community Health Needs Assessment Process http://www.cdc.gov/chinav/index.html and New Requirements for 501(c)(3) Hospitals Under the Affordable Care Act https://www.irs.gov/charities-non-profits/charitable-organizations/new-requirements-for-

501c3-hospitals-under-the-affordable-care-act?_ga=1.49972196.378713778.1477075620.

Partnering With School Wellness Programs

The Child Nutrition and WIC Reauthorization Act of 2004 (Pub. L.108–265), required each local educational agency (LEA) participating in the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP) to establish a local school wellness policy by School Year 2006. Local school wellness programs are intended to empower local communities to work together to promote and reinforce healthy eating and lifestyle behaviors. SNAP-Ed helps contribute to community health and wellness goals by providing and supporting nutrition education and obesity prevention services within eligible schools and other eligible venues. These activities help low-income students and their families make healthy eating and physical activity-related decisions in accordance with the DGA 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.

The Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 Proposed Rule would require all LEAs participating in the NSLP and/or the SBP to meet expanded local school wellness policy requirements, establish the framework for the content of these policies, ensure stakeholder participation in the policy development, and require periodic assessment of compliance and reporting on the progress toward achieving wellness policy goals[6]. The rule also requires LEAs, as part of the local school wellness policy, to implement policies for the marketing of foods and beverages on the school campus during the school day consistent with nutrition standards. LEAs are encouraged in the rule to include SNAP-Ed coordinators and educators among others on local school wellness policy committees. Many SNAP-Ed providers already provide nutrition education in classrooms and may be able to broaden the reach of a school's local school wellness activities through SNAP-Ed collaborative efforts with other publicly or privately funded national, State, and local nutrition education and health promotion initiatives and interventions. Working within school wellness policy committees affords opportunities for SNAP-Ed providers to expand the scope of the activities conducted in the school setting using PSE efforts.

SNAP-Ed providers may participate on — but not lead — school wellness committees. Leadership in developing, implementing, maintaining, and enforcing the local wellness policy remains the responsibility of the LEA. SNAP-Ed providers may offer consultation on strategies that will help schools become community nutrition and wellness hubs.

[6] Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 Proposed Rule, February 26, 2014

Examples of other school wellness policy committee activities for which SNAP-Ed providers may contribute expertise and/or funds include:

- School-based nutrition and physical activity environmental assessments
- Healthy classroom checklists
- Integrating physical activity into the school day through activities such as instant recess
- Use of non-food items for rewards
- School or community gardens
- Policies to allow use of school recreational facilities during non-school hours
- Walking school buses
- Training on Smarter Lunchrooms in partnership with school district staff

As part of the local needs assessment, local SNAP-Ed agencies must demonstrate how these activities help to fill an unmet need in schools that lack the appropriate nutrition education staff or resources.

States are reminded that SNAP-Ed funds may not be used for school-based food service activities, paying food service workers, or any efforts focused on implementing new meal patterns for reimbursable meals or snacks. SNAP-Ed might be able to assist in some areas of school food service, as long as the SNAP-Ed rules are followed. For example, SNAP-Ed might be able to help train school food service personnel in culinary techniques to support healthy eating such as reducing sodium or preparing fruit and vegetables if such expenses do not duplicate other FNS program and are targeted at SNAP-Ed eligible populations.

States should consult with Regional SNAP-Ed Coordinators should they have questions about which activities are allowable

Examples of Allowable and Unallowable Costs

Literature/Materials/Audiovisuals

Allowable

- The 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 FNS or CNPP 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.

Unallowable

- 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 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 DGA and MyPlate.

Social Marketing Programs

Allowable

- Electronic, outdoor, indoor, transit, and print announcements of nutrition education and obesity prevention-related activities for the SNAP-Ed target audience.
- Social and multi-media initiatives that are part of comprehensive interventions.
- Appropriate social marketing programs in which messages are delivered in areas, venues, or using communication channels where at least 50 percent of the audience is eligible for SNAP-Ed.
- Social media, web sites, and other digital content designed for, tailored to, and predominantly promoted to the SNAP-Ed target audience.
- Television and radio announcements/advertisements that do not include a brief message about SNAP, its benefits, and how to apply.

Unallowable

- Social marketing that targets 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 DGA and MyPlate
- Television and radio announcements/advertisements that contain messages about SNAP, its benefits, and how to apply.

Equipment

Allowable

- Purchase of office equipment. A State 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 as long as such use is incidental.

- Kitchen appliances, only with justification of need.

Unallowable

- 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

Allowable

- Cost of food for recipe/taste testing purposes.
- 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.

Food service and safety are regulated by State and/or local agencies. All food service activities must follow guidelines set out by cognizant agency (State or local) responsible for oversight of food service.

Unallowable

- 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

Allowable

- 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, and referral that includes a nutrition-related message based on DGA connected to the intervention.
- Classes on calorie balance (nutrition and physical activity) to manage weight consistent with the DGA.
- Activities that assist in advancing a nutrition education or obesity prevention-related community or environmental change for the low-income population.
- The pro rata share of costs of classes that are provided in conjunction with another program, such as 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.
- Messages that teach how to compare ingredients and nutrients among foods and beverage products.

- Diabetes prevention education, promotion, and support that focuses on obesity prevention and is coordinated with multi-level interventions and/or public health approaches.
- **New:** Nutrition and food safety education for individuals impacted by disasters and eligible for the Disaster Supplemental Nutrition Assistance Program (D-SNAP). **End of new material.**

Unallowable

- 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 F, 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*
- Clinical health screening (i.e., cholesterol testing, and blood glucose testing, etc.).
- Distribution of nutrition education and physical activity reinforcement items costing over $5.00 each.
- Nutrition education costs that are charged to another Federal program such as WIC, EFNEP, Head Start.
- 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.

Space Allocation

Allowable

- 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.

Unallowable

- Commercial rental space charges cannot be used for publicly owned space.

Staff and Training Costs

Allowable

- SNAP-Ed-related training for program delivery staff.
- Staff time spent delivering nutrition education and obesity prevention activities 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 activities in the community.
- Compensation for State agency staff to plan, oversee, and/or monitor the use of SNAP-Ed funds.
- Orientation of school, child care, or appropriate worksite food service staff on collaborative PSE change efforts.

Unallowable

- 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 conducting SNAP-Ed activities 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-Ed target population.
- Training or development costs of food service workers or others not directly associated with delivery of SNAP-Ed.

Policy, Systems, and Environmental Changes (PSEs)

Allowable

- Costs associated with the implementation and maintenance of PSE efforts within the scope of SNAP-Ed.
- Consultation with partner organizations on promoting organizational policy and practice changes that support healthy food and beverages, physical activity, and reduced sedentary behavior (e.g., entertainment screen time).
- Analyzing and preparing data reports and sharing information on the expected benefits of PSE changes.
- Consultation and training with food retailers, farmers, food distributors, and farmers market managers on increasing access to and promotion of whole grains, fruits and vegetables, and low-fat dairy.
- Conducting environmental scans or assessments of the food and activity environments where food and activity decisions and choices are made.
- Community forums or meetings with SNAP-Ed eligible populations or service providers on healthy eating and active living.
- Point-of-purchase or point-of-decision signage and other behavioral cues to action that promote healthy eating or physical activity choices.
- Resource kits with strategies for adopting, implementing, maintaining, and evaluating policy, systems, and environmental changes.

- Consultation with partner organizations on measures to address and reduce food waste and maximize utilization and consumption of available healthy food resources.

Unallowable

- Costs associated with the establishment and maintenance of environmental or policy changes outside of the scope of SNAP-Ed, such as infrastructure, equipment, space, land, or construction.
- Costs associated with capital improvements to retail stores, sidewalks, trails, bicycle paths, or dining facilities.
- Costs associated with refrigeration units or shelving in grocery or convenience stores.
- Financial incentives to community partners or retailers to support environmental or policy changes.
- Salaries for retail store staff, farmers market managers, or food service workers for service operations.
- License or permit fees for farmers markets or food retailers.

Costs Associated with Other Activities

Allowable

- 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. Allowable costs for focus group participants are intended to reimburse for incurred costs, not to provide a financial incentive for participation.
- Interventions 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.

Unallowable

- 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.
- 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.

Financial and Cost Policy Supplement

Costs Associated with Program Efforts

Physical Activity

THE 2008 PHYSICAL ACTIVITY GUIDELINES FOR AMERICANS (http://health.gov/paguidelines/guidelines/default.aspx) provide Guidance to help Americans improve their health through appropriate physical activities. FNS encourages States to include the related *2015-2020 DIETARY GUIDELINES FOR AMERICANS(DGA)* key recommendation, to meet the Physical Activity Guidelines for Americans, in the SNAP-Ed Plans. Efforts to improve the health and fitness of program participants could include:

- Activities to help participants follow a healthy eating pattern by providing nutrition education and linking it to 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 200 Subpart E allow FNS to make reasonable judgments as to what is necessary and reasonable to deliver SNAP-Ed. Section 4028 of the 2014 Farm Bill (Public law 113-79) reinforced the physical activity dimension of SNAP-Ed by inserting “and physical activity” into section 28(b) of the FNA. This action recognizes physical activity promotion as an integral part of SNAP-Ed. Costs incurred for that purpose are allowable, subject to the following guidance.

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, and hula-hoops to use in ongoing physical activity in conjunction with nutrition education provided to the low-income target audience. States should consult their Regional SNAP-Ed Coordinator about reasonable physical activity-related interventions for SNAP-Ed.

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 explain the associated health benefits of active lifestyles.
- All programming such as workshops, conferences, and trainings for SNAP-Ed that encourages physical activity also should include promotion of healthy eating patterns. 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 State and implementing agencies may use nutrition education funds to develop nutrition education and physical activity material that is reasonable and necessary for SNAP-Ed purposes. 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 FNS and CNPP materials, and ones available through the SNAP-Ed Connection, CDC, and other Federal Government agencies. Using or adapting successful interventions developed by others is preferable to developing new materials.
- FNS program State and implementing agencies 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 such activities.
- FNS encourages PSE interventions that promote and support physical activity.

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

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)
- 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 ways. States may develop or adapt existing educational materials to teach physical activity concepts coupled with nutrition-related messaging or collaborate with partners on physical activity PSE change efforts in schools, childcare, or communities as examples.

Physical activity education and promotion as part of nutrition education sessions in SNAP may include provision of general advice, demonstrations (instructional in nature), nutrition education integrated into ongoing physical activity sessions, and community resource information in order to encourage the SNAP-Ed population to engage in regular physical activities.

CDC Division of Nutrition, Physical Activity, and Obesity Physical Activity Web page provides a range of resources at http://www.cdc.gov/physicalactivity/index.html.

Physical activity information for youth is available at: https://www.nccor.org/nccor-tools/youthcompendium/

Gardening

Food-based 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, small gardening tools and supplies such as fertilizer and potting soil to assist in developing school and community food gardening projects are allowable SNAP-Ed costs. Educational supplies, curricula, and staff salaries to teach food gardening concepts that reinforce the beneficial nutrition and physical activity aspects of food gardening are allowable costs. Staff salaries to establish and maintain community food gardens, such as in low-income housing projects or schools may be allowable but should be submitted to FNS for prior approval. Provision of time for food 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 food gardening purposes. FNS encourages State agencies to coordinate with the Federal, State, local, and private initiatives that create sustainable food gardens as PSE efforts to benefit schools and communities through collaborative efforts. SNAP-Ed providers can play an instrumental role in community food gardening for the low-income population. More information about community gardening is available here:
http://www.cdc.gov/healthyplaces/healthtopics/healthyfood/community.htm

Farmers Markets

Farmers Markets offer multiple opportunities to partner with SNAP-Ed providers. States have the flexibility to implement PSE change efforts using multi-level interventions for nutrition education and obesity prevention services at farmers markets. Examples include:

- Working to bring farmers markets to low-income areas, such as advising an existing market on the process for obtaining Electronic Benefits Transfer (EBT) machines to accept SNAP benefits and marketing farmers markets to low-income individuals and communities.
- Providing nutrition education interventions at farmers markets serving low-income communities.
- Partnering with organizations that offer incentives for the purchase of fresh produce at Farmers Markets.
- Conducting food demonstrations and sharing appropriate recipes with shoppers.
- Consultation and training with farmers and farmers market managers on increasing access to and promotion of fruits and vegetables, whole grains, and low-fat dairy to low-income customers.

Note that SNAP-Ed funds may not be used to provide the cash value of financial incentives, but SNAP-Ed funds can be used to engage farmers markets and retail outlets to collaborate with other groups and partner with them.

Food service and safety are regulated by State and/or local agencies. All food service activities must follow guidelines set out by cognizant agency (State or local) responsible for oversight of food service.

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 an Inter-agency Agreement or Memorandum of Understanding stating the degree of collaboration and the specific responsibilities of WIC (i.e., staff, duties, and time) and SNAP-Ed shall be signed by all collaborating agencies and maintained for inspection. SNAP-Ed can advance breastfeeding in its programming through such activities as working on lactation policies and promotion at low-wage work sites, childcare facilities, or other community venues. More information about breastfeeding promotion is available at the Surgeon General's Call to Action to Support Breastfeeding at http://www.surgeongeneral.gov/library/calls/breastfeeding/calltoactiontosupportbreastfeeding.pdf, the WIC Works Resource System at https://wicworks.fns.usda.gov/breastfeeding, and CDC's breastfeeding page at http://www.cdc.gov/breastfeeding/.

Nutrition Education Reinforcement Materials

Nutrition education reinforcement materials refer to products given to the SNAP-Ed audience or those closely associated with SNAP-Ed. Such items convey nutrition messages and promote healthy nutrition and physical activity practices and may include items such as measuring cups or pedometers. These items must have a direct relationship to program objectives and the desired nutrition or physical activity behavior change. Terms used to describe these items include enhancement items, home reinforcements, 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:

- 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 behaviors among the SNAP-Ed target audience.
- Have 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 $5.00 or less per item.
- Not be used solely for marketing or 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.
- Any program incentive item intended for persons who are not SNAP-eligible or potentially SNAP-eligible.

Knives are not considered acceptable NERI items. Knives should only be used for recipe preparation for food demonstrations or direct education classes.

Administrative Efforts

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 of the Social Security Act.
- 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.
- Is assigned to or placed in a college or a certain other school through:
    - A program under the Workforce Innovation and Opportunity Act of 2014.
    - A program under Section 236 of the Trade Act of 1974.
    - An employment and training program under the Food Stamp Act .
    - 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.

Scholarships and Tuition

2 CFR 200.466 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 necessary and reasonable cost 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 the institutional 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

Weekly time and effort reporting is required by staff (cost share and salaried staff) devoting less than 100% of their time to SNAP-Ed. While the Circulars (A-21 and A-87) do not specify the frequency of the time reports (personnel activity report), FNS chose to require weekly time sheets for all staff working less than 100% of their time on SNAP-Ed. Circular A-87 does set a monthly cycle as the maximum period for time reports, however, we require weekly cycles.

Employees devoting 100% of their time to SNAP-Ed do not need to maintain weekly time sheets; however semi-annual time and effort certification by a supervisor is required.

Circulars identify the signature authority as the supervisor or primary investigator. Although time devoted to SNAP-Ed must be recorded and signed by the employee on a weekly basis for staff devoting less than 100% time, certification of the time sheets may occur on a bi-weekly basis. Certification may be completed by someone who is knowledgeable of the employee's duties and their work with SNAP-Ed. This could be a SNAP-Ed Implementing agency/SNAP-Ed subcontractor employee, another designated person, or the cost-share employee's supervisor (i.e. school principal for a teacher contributing cost share to SNAP-Ed). The certifying employee must sign the time sheets bi-weekly and may use electronic signatures in bulk, up to 20 sheets (one employee per sheet) per transmittal.

There are other options for personnel activity reporting. States may use time studies or other methods, approved by FNS, to account for time spent working on FNS programs.

In addition, time documentation forms must reflect after the fact reporting and may not be completed in advance of the activity and later certified by the employee. OMB Circulars A-87 (2 CFR 225) and A-122 (2 CFR 230) for States and non-profits state that support reports must reflect an after the fact determination of activity as noted in the below information taken from A-122 (2 CFR 230):

- *The reports must reflect an after-the-fact determination of the actual activity of each employee. Budget estimates (i.e., estimates determined before the services are performed) do not qualify as support for charges to awards. (Appendix B Item 8.m.(2)(a))*

OMB Circular A-21(2 CFR 220) for Educational Institutions mentions that any method for tracking personnel costs *must recognize the principle of after the fact confirmation or determination so that costs distributed represent actual costs, unless a mutually satisfactory alternative agreement is reached. (Section J.10.b.(2)(b))*

Time documentation forms should be available for review during Management Evaluations or upon request of the Regional Coordinator.

Standards for documenting Staff time also come from 2 CFR 200.430 (i), which is excerpted below. Consultation with Regional Office staff will be necessary as the changes related to the Uniform Guidance are implemented.

(i) Standards for Documentation of Personnel Expenses (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

(i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;

(ii) Be incorporated into the official records of the non-Federal entity;

(iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities (for Institute of Higher Education {IHE}, this per the IHE's definition of Institutional Base Salary {IBS});

(iv) Encompass both Federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;

(v) Comply with the established accounting policies and practices of the non-Federal entity (See paragraph (h)(1)(ii) above for treatment of incidental work for IHEs.); and

(vi) [Reserved]

(vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

(viii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:

(A) The system for establishing the estimates produces reasonable approximations of the activity actually performed;

(B) Significant changes in the corresponding work activity (as defined by the non-Federal entity's written policies) are identified and entered into the records in a timely manner. Short term (such as one or two months) fluctuation between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term; and

(C) The non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal awards based on budget estimates. All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

(ix) Because practices vary as to the activity constituting a full workload (for IHEs, IBS), records may reflect categories of activities expressed as a percentage distribution of total activities.

(x) It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs, a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.

For States, local governments, and Indian Tribal Organizations, substitute processes or systems for allocating salaries and wages to Federal awards may be used in place of or in addition to the records described above if approved by the cognizant agency for indirect cost. Such systems may include, but are not limited to, random moment sampling, “rolling” time studies, case counts, or other quantifiable measures of work performed.

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.

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 the new Uniform Guidance, 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 that 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 200 Appendix III.

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.

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 quality SNAP-Ed programming for the SNAP-Ed audience. States are reminded that they may use a portion of their SNAP-Ed allocation for State agency travel for the same purpose. Agencies must provide the following information for all travel included in the SNAP-Ed budget:

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 is necessary to achieve 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 (4) 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.
    - For attendance at regional conferences or meetings, with attendance invitations limited to a specific area, no more than six (6) staff persons are allowed per State.
    - For attendance at State or local conferences or meetings with attendance limited to a specific area within State borders, no more than eight (8) staff persons are allowed per State.
    - If the attendance Guidance provided above do not allow you to meet the needs of your SNAP-Ed activities, please contact your Regional Office to determine if an alternative number of attendees is allowable.

Per Diem Rates: The standard State or Federal per diem rates shall be applied. These can be found at https://www.gsa.gov/travel/plan-book/per-diem-rates. In addition, all travel restrictions found in the OMB regulations (e.g., no first-class tickets, etc.) shall be followed.

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 G DEFINITIONS OF TERMS* for terms used in these templates. The templates are available as stand-alone documents on the SNAP-Ed Connection at https://snaped.fns.usda.gov/program-administration/guidance-and-templates and are Word or Excel spreadsheets on the SNAP-Ed Connection.

- Template 1. Identifying and Understanding the SNAP-Ed Target Audience
- Template 2. State Agency Goals, Objectives, Projects, Campaigns, Evaluation, and Collaboration
- Template 3. SNAP-Ed Staffing Plan
- Template 4. Section A: SNAP-Ed Plan Budget Information By Project (for Sub-Grantees)
- Template 4. Section B: SNAP-Ed Budget Information By Project
- Template 4. Section C: SNAP-Ed Budget Information By Project (Travel)
- Template 5. SNAP-Ed Plan Assurances
- Template 6. SNAP-Ed Plan Signatures
- Template 7. Section A: SNAP-Ed Narrative Annual Report
- Template 7. Section B: SNAP-Ed Summary for Impact Evaluations

Template 1: Identifying and Understanding the SNAP-Ed Target Audience

Needs Assessment Methodology

Concisely describe and justify your methodology for assessing the population health-related nutrition and physical activity needs of the State target audience. Sources of data may include obesity and poverty rates, racial/ethnic differences, tribal status, fruit and vegetable consumption, Behavioral Risk Factor Surveillance System data. Refer to Section 2 of this Guidance, Describing the Target Audience for other sources. Ensure data is current, i.e., less than five years old.

Existing information (source, content, time frame):

New information collection (source and content):

Needs Assessment Findings

Demographic Characteristics of SNAP-Ed Target Audience:
If information is available, discuss geographic location, race/ethnicity, tribal status, age, gender, family composition, education, and primary language. Reference the source(s) of any data described.

Target Audience (Add rows as needed)	Source (Add rows as needed)

State-Specific Diet-Related Health Statistics on Target Population:
Provide State-specific data on child and adult obesity and diet-related diseases such as Type 2 diabetes and hypertension, for target population if available.

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.).

Areas of the State Where SNAP Target Audience Is Underserved or Has Not Had Access to SNAP-Ed Previously:

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

Template 2: SNAP-Ed State Goals, Objectives, Projects, Campaigns, Evaluation, and Collaboration

State Agency Goals and Objectives:

Identify your State's 3-5 population health goals and related objectives based on the needs assessment and current availability of other services. Use the SMART format.

State-Level Goals (Add lines as needed):

State-Level Objectives (Add lines as needed):

Reporting Progress on State-Level Goals and Objectives:

Please describe how your State plans to electronically collect evaluation data that indicates progress towards State-level goals and objectives.

Description of projects/interventions:

Answer all questions for each project/intervention.

Project/Intervention Title:

Related State Objective(s):

Specify the objectives that the project/intervention will accomplish. Use the SMART format. Clearly state the purpose of the project.

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

Food and Activity Environments:

Describe how the project will reflect audience's awareness and access to healthy foods and beverages, and places to be physically active.

Project Description:
Note how you will implement the program. Include information describing: Behavioral, policy, systems, or environmental changes; key educational messages; how and where services will be delivered, partner organization roles and contributions, duration of project; projected total number of individuals, sites, or systems participating or reached; and for strategies that include social marketing, include the frequency of messages.

Evidence Base:
Provide the name of each project, identify the evidence level, either research- or practice-based, and cite the supporting references. (Refer to the Checklist for Evidence-Based Approaches in Appendix E.

Key Performance Indicators (KPIs):
List the key measures/indicators of implementation or performance that you will capture or collect. Identify if these are new measures/indicators not collected in the past. 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.

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.

Development of New Educational Materials:
Identify any new materials that you plan to produce or purchase and justify the need and cost.

Evaluation Plans

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

Name: The name(s) of each project(s) that will be a part of this evaluation

Type: The type of evaluation as primarily a formative, process, outcome or impact assessment

Questions: The questions(s) that will be addressed

Provide approaches and planned use for each evaluation question.

Approach(es): The approach to conducting the evaluation, including scope, design, measures and data collection (Add lines as needed)

Planned use: Plans for using the results (Add lines as needed)

Prior Evaluation: If the project has been evaluated previously, note the most recent year in which the evaluation was done

Use of SNAP-Ed Evaluation Framework: Identify the Evaluation Framework indicators that are used.

Coordination of Efforts

Describe efforts to coordinate, complement, and collaborate with other programs in order to deliver consistent behavior-focused nutrition and/or physical activity messages, comprehensive multi-level interventions, and community-based and public health approaches and to maximize the reach and potential impact of Federal nutrition education and nutrition assistance programs. State the purpose of the coordination and SNAP-Ed's role. Describe how efforts avoid duplication of services, especially when two IAs are working in the same venue or jurisdiction. Retain written agreements.

Template 3: SNAP-Ed Staffing Plan

Provide the following summary by SNAP-Ed project for all paid staff in the budget. Complete a summary for each project. 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. Add rows as needed.

Project Name:

Position Title Attach statement of work listing SNAP-Ed related job duties for each position	FTEs charged to SNAP-Ed 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 SNAP-Ed delivery. Include all approaches described in Guidance Section 1	SNAP-Ed Salary, Benefits, and Wages Federal dollars only
			Total Staffing Budget: Enter total for all salary, benefits, and wages from Federal dollars here.	

Template 4: SNAP-Ed Budget Information by Project

Section A. Budget Summary for Sub-Grantee

Refer to Appendix E. for additional information on allowable costs.

Contracts/Grants/Agreements for nutrition education services:

Provide the information below for each contract, grant, or agreement.

Name of sub-grantee:

Total Federal funding, grant:

Description of services and/or products:

Cost of specific services and/or products:

Section B. 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. An Excel version of this form is available online at the SNAP-Ed Connection. **New:** Please note the clarification of some cost categories below in order to comply with the Agriculture Improvement Act of 2018. **End of new material.**

Federal Fiscal Year:

State:

Sub-grantee Name:

Expenses	Unobligated Balances (Carry-over) from Previous FY	Current FY Budget	Non-Federal Support
Salary/Benefits			
Contracts/Sub-Grants/Agreements			
Non-Capital Equipment/ Office Supplies			
Nutrition Education Materials			
Travel			
Building/Space Lease or Rental			
Cost of Publicly-Owned Building Space			
Maintenance and Repair			
Institutional Memberships and Subscriptions			
Equipment and Other Capital Expenditures			
Total Direct Costs			
Indirect Costs (Indirect Cost Rate=_____)			
Total Federal Funds			Leave blank
Total Federal Funds Including Unobligated Balance from Previous FY	Leave Blank		Leave Blank
Estimated Unobligated Balance from Current FY to Next FY, if any	Leave blank		

Signature of Responsible Official: _____

Date: _____

Budget narrative:

Salary/Benefits:

Contracts/Sub-Grants/Agreements: Retain copies of agreements on site.

Non-capital equipment/office supplies:

Nutrition Education Materials:

Travel:

Building/space lease or rental:

Cost of publicly-owned building space:

Maintenance and repair:

Institutional memberships and subscriptions:

Equipment and other capital expenditures:

Total direct costs:

Total indirect costs: Include both a total and the indirect cost rate. Provide assurance that the indirect cost rate is an approved rate as described in *SECTION 3, FINANCIAL AND COST POLICY*.

Total Federal funds:

Estimated unobligated balances (carry-over) from current FY to next FY, if any:
Please note that unobligated balances cannot be obligated in the next Federal FY if the funds are in the last year of their two-year period of performance.

Total Federal funds including unobligated balance from previous FY:
Indicate the total amount of Federal funding to be used in your State Plan. **This should include any unobligated balance from the previous FY.**

Section C. 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 SNAP-Ed programming for the target audience. States are reminded that they may use a portion of their SNAP-Ed allocation for State agency travel for the same purpose. Total Travel Cost (In- and Out-of-State) per project to be entered as line 5 of budget summary (Template 4).

Provide the following information for all travel included in your SNAP-Ed budget:

In-State Travel

Travel Purpose: Justification of need for travel, including how attendance will benefit SNAP-Ed

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

Number of staff traveling:

Cost of travel for this purpose:

Total In-State Travel Cost:

Out-of-State Travel

Travel Purpose: Justification of need for travel, including how attendance will benefit SNAP-Ed

Travel destination (city and State):

Number of staff traveling:

Cost of travel for this purpose:

Total In-State Travel Cost:

Template 5: SNAP-Ed Plan Assurances

State Agency completion only: 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
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.		
Efforts have been made to target SNAP-Ed to the SNAP-Ed target population.		
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.		
Documentation of payments for approved SNAP- Ed activities is maintained by the State and will be available for USDA review and audit.		
Contracts are procured through competitive bid procedures governed by State procurement regulations.		
Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB circulars governing cost issues.		
Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.		
Program activities are reasonable and necessary to accomplish SNAP-Ed objectives and goals.		
All materials developed or printed with SNAP Education funds include the appropriate USDA nondiscrimination statement and credit to SNAP as a funding source.		
Messages of nutrition education and obesity prevention are consistent with the Dietary Guidelines for Americans.		

Template 6: SNAP-Ed Plan Signatures

Supplemental Nutrition Assistance Program Annual Plan for SNAP-Ed

State Agency:

Date:

Federal Fiscal Year:

Certified By:

Date:

SNAP STATE AGENCY FISCAL REVIEWER

Date:

Template 7: Section A. SNAP-Ed Narrative Annual Report

Consolidate all implementing agency (IA) information into one State annual report using the template below. Refer to the Definitions Section for terms used in this template.

SNAP-Ed Program Overview:

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

Progress in achieving no more than 3-5 overarching goals:

Number of new projects implemented during the reporting year by identified primary approach: (specify approach as Direct, Indirect, Social Marketing, Policy, Systems, or Environmental Change)

Number of ongoing projects that were operational during the reporting year identified by primary approach: (specify approach as Direct, Indirect, Social Marketing, Policy, Systems, or Environmental Change):

Major achievements (not already addressed):

Major setbacks, if any:

Overall assessment:

SNAP-Ed Administrative Expenditures

To help FNS better understand State SNAP-Ed administrative expenditures, provide the percent and dollar value of administrative expenses used for each IA in the State for each of the following categories. A sample calculation of percent of total administrative expenditures is as follows: Administrative expenditures for X University are $550,000. Administrative salary expenses totaled $220,000. ($550,000 / $220,000) x 100 = 40%, so 40 percent of administrative expenditures was used for administrative salaries. **New:** Please note the clarification of some cost categories below in order to comply with the Agriculture Improvement Act of 2018. **End of new material.**

Percent of Total Administrative Expenditures for each Implementing Agency by Type of Expense

Type of Administrative Expense:	Name of IA: (Example) X State University		Name of IA: (add columns as needed)	
	% values (Example)	$ values (Example)	% values	$ values
Administrative Salary and Benefits	40%	$220,000		
Administrative Training Functions	15%	$82,500		
Reporting Costs	2.5%	$13,750		
Equipment/Office Supplies	10%	$55,000		
Operating Costs	10%	$55,000		
Indirect Costs (not including building space)	12%	$66,000		
Building/Space Lease or Rental	0%	$0		
Cost of Publicly-Owned Building Space	10%	$55,000		
Institutional Memberships and Subscriptions	0.05%	$2,750		

SNAP-Ed Evaluation Reports Completed for this Reporting Year

Using the table 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 following abbreviations to indicate the type of evaluation that was performed:

- **FE = Formative Evaluation**
- **PE = Process Evaluation**
- **OE = Outcome Evaluation**
- **IE = Impact Evaluation**

To learn more about the definition of each type of intervention, please visit *SECTION 2. SNAP-ED PLAN PROCESS, ANNUAL REPORT, SECTION A. NARRATIVE ANNUAL REPORT, SNAP-ED EVALUATION REPORTS* of the SNAP-Ed Guidance.

Include a copy of each evaluation report that was produced as an appendix. Evaluation reports should clearly identify the associated project name(s) on the cover or first page. Add rows as needed.

Project Name	Key Project Objective(s)	Target Audience	Evaluation Type(s) (FE, PE, OE, IE)

SNAP-Ed Planned Improvements:

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).

Other Accomplishments (Optional)

States may provide a brief description of other SNAP-Ed projects that have had major impacts and are not reported in the sections above. Relevant documentation may be attached as an appendix. Potential topics for inclusion are listed below:

- **Staff/partner trainings**
- **Conference presentations and/or other journal publications**
- **Curriculum development**
- **Partnership activities**

- **Case studies**
- **Award**

Appendices:
Attach evaluation reports included under item #3.

Template 7: Section B. SNAP-Ed Annual Report Summary for Outcome and Impact Evaluations

Provide the information requested below for any impact evaluation efforts that were completed during the previous year.

Name of Project or Social Marketing Program: If multiple projects or programs were part of a single impact evaluation, please list each of them.

Total Cost of Evaluation

Project Goals: Identify each specific goal being assessed by the evaluation.

Evaluation Design

Evaluation participants: Describe how many units (and individuals if they were not the unit of assignment) were being evaluated

Assignment to intervention and control or comparison conditions

Unit of Assignment: Describe the unit of assignment to intervention or control or comparison groups. 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.

Group Assignment: Describe how assignment to intervention and control groups was carried out. Be explicit about whether or not this assignment was random.

Unit Retention: Provide the percentage of participants by treatment condition (intervention and control group) that completed the intervention.

Outcome and Impact Measure(s): For each evaluation impact, describe the measure(s) used. Descriptions should indicate if the focus is on knowledge, skills, attitudes, behavior, PSE change, or something else. Each measure should be characterized in terms of its nutrition or obesity prevention focus, e.g. “was a policy

implemented making an improvement in a school nutrition or physical activity environment?”

Data Collection: 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. Finally indicate if impact data were collected through observation, self-report, or another method.

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.

Description of how evaluation results will be used:

Point of Contact: Provide a contact for additional details.

Relevant Journal References: Reference to any other report of the evaluation. Include whether the results will be submitted for publication, and if so, to what publication.

Appendix B: Supplementary Checklists and Templates

States that are using the SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention Indicators are strongly encouraged to report their State outcomes for seven priority indicators using a Template in this Appendix. States may also complete and submit this Template as an attachment to their FFY 2019 Annual Report due on November 30, 2019.

Two checklists and another template used by some States are also provided for your use. The Checklist for Evidence-Based Approaches and the Checklist for Public Health Approaches were developed by the Western Region and are used by some other Regions. They provide detailed descriptions, steps, and examples that may assist States as they consider approaches for delivery of nutrition education and obesity prevention services. The *Budget Detail Template* developed and used by the Mountain Plains Region is completed in addition to the *Template 4: Section A. Budget Summary for Sub-grantees* to gather budgetary information in another format. States may wish to contact their Regional SNAP-Ed Coordinators with questions about using these materials.

- Project/Intervention Summary Sheet
- Reviewing State SNAP-Ed Plans Checklist
- Reporting SNAP-Ed Priority Outcome Indicators –Using the SNAP-Ed Evaluation Framework
- Checklist for Evidence-Based Approaches
- Checklist for Public Health Approaches
- Budget Detail Template
- Executive Summary Examples

Project / Intervention Summary Sheet

This summary sheet was completed and submitted by States in one Region during the SNAP-Ed Plan development process to describe each project/intervention. States may find this summary form useful to concisely describe their Plan projects and interventions.

Name of project

Implementing Agency

Project description (please describe project succinctly in 2 – 3 sentences)

Location & setting

Primary goals & objective(s)

How are the objectives related to your needs assessment?

Target audience (age group and estimated number attendees expected per session)

If community partners are involved, list them here

How were roles for community partners decided upon and defined?

Are there policy, systems, or environmental (PSE) supports for the educational component?

If yes, please describe

Single session or series

If series, how many sessions provided for each series?

Direct education participants (estimate number of unduplicated participants for each session)

Other Intervention Type Participants (social marketing or PSE)

How were these participants calculated?

Implementation plan

Curriculum/a used

Handouts/print materials used (attach handout or website link)

Educational reinforcement items (what and when provided)

How was project eligibility determined?

Do the strategies and/or interventions meet research-based standards or practice-based standards?

If so, how?

If there are multiple groups/agencies providing nutrition education at this same physical location (project site), describe the partnership that is on-going and how the nutrition education messages are coordinated

Evaluation? If so, is knowledge, behavior, or other being assessed?

Did this project operate last year?

If so, are there changes? What are they?

Project staffing (number FTE)

Total cost of project

Staffing

Equipment/supplies

Nutrition Education Reinforcement Items (NERI)

Travel

Building/space allocation (how calculated?)

If this is NOT a group/individual education site, is it a media, social marketing, or website project?

If yes, please describe

Notes

Reviewing State SNAP-Ed Plans Checklist

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:

General	Yes	No
Was the plan submitted by 8/15?		
Is the plan complete?		
Is the plan signed by appropriate State representatives?		
Does the plan use appropriate templates?		
Are copies of Interagency Agreements maintained by the State?		
Overall, does the plan seem reasonable, and will it accomplish the SNAP mission?		

Needs Assessment	Yes	No
Are methods and sources used appropriate?		
Does it adequately define the audience and its needs?		
Does it identify other nutrition and obesity prevention programs serving low-income persons?		
Does it identify areas that are underserved?		

Goals and Objectives	Yes	No
Are the State goals and objectives consistent with SNAP-Ed Plan 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 Dietary Guidelines for Americans, MyPlate, and the Physical Activity Guidelines for Americans?		
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?		

Coordination Efforts	Yes	No
Are coordination efforts designed so duplication of efforts is eliminated?		
Is SNAP-Ed's role in State SNAP defined?		

Staffing	Yes	No
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 (applies to colleges and universities only)?		
Is an indirect cost rate agreement included?		
Is the math correct?		

Assurances	Yes	No
Are assurances included?		

Evaluation	Yes	No
Is the evaluation type defined?		
Is the methodology adequately defined?		
Are plans for using the results defined?		

Reporting SNAP-Ed Priority Outcome Indicators –Using the SNAP-Ed Evaluation Framework

States that are using the *SNAP-Ed Evaluation Framework*'s nutrition, physical activity, and obesity prevention indicators should report their State outcomes for at least five out of seven national priority indicators using this template. States may also complete and submit this template as an attachment to their FFY 2019 Annual Report due on January 31, 2020.

Four Core Indicators (measure these four)

All States are strongly encouraged to measure the following four core indicators of changes at the medium-term components of the *SNAP-Ed Evaluation Framework*. The first three are indicators of behavioral changes in SNAP-Ed participants in direct education programs. The fourth is a multi-component indicator of adoption and reach of nutrition policy, systems, environmental changes and promotion across the environmental settings where SNAP-Ed eligible populations eat, learn, live, play, shop, and work.

Indicator Code (MT = medium-term)	Indicator Name
MT1	Healthy Eating Behaviors
MT2	Food Resource Management Behaviors
MT3	Physical Activity and Reduced Sedentary Behaviors
MT5	Nutrition Supports Adopted in Environmental Settings

Two Partnerships and Coalition Indicators (measure at least one)

All States are strongly encouraged to measure at least one or both of the following indicators of partnerships and coalitions associated with short-term components of the *SNAP-Ed Evaluation Framework*. The first indicator, ST7, tracks changes in organizational partnerships, councils, or collaboratives in qualified SNAP-Ed settings that organize themselves around a common agenda, mission, or strategic plan to adopt nutrition or physical activity practices, supports, and/or standards. The second indicator, ST8, identifies changes in multi-sector partnerships representing diverse sectors of influence or industries at the community or jurisdiction level (e.g., district, parish, city, town, county, borough, region, Indian Nation, or U.S.-affiliated territory). The community may be defined by geographic, demographic, and/or civic/political boundaries.

Indicator Code (ST = short-term)	Indicator Name
ST 7	Organizational partnerships
ST 8	Multi-sector partnerships and planning

Population Results Indicator (measure, if possible)

All States are strongly encouraged to measure the Fruits and Vegetables indicator, R2, from the Population Results section of the SNAP-Ed Evaluation Framework. Population Results indicators are markers of the low-income population's achievement of recommendations put forth in the *Dietary Guidelines for Americans (DGA)* and *Physical Activity Guidelines for Americans (PAGA)*, and their associated health and well-being. Population-level indicators measure changes over time in the behaviors that promote positive health outcomes. R2 measures the low-income population (within 185% of Federal poverty level) that ate fruits one or more times per day and vegetables one or more times per day.

Indicator Code (R = population results)	Indicator Name
R 2	Fruits and Vegetables

Reporting outcomes for these indicators is a meaningful way to demonstrate SNAP-Ed effectiveness across multiple levels of the Social-Ecological Model and inform continuous program improvement. Reporting additional outcomes beyond these seven is highly encouraged.

MT1 Healthy Eating Behaviors

For this indicator, specify the survey(s) or data collection tool(s) and age group(s) surveyed: For each outcome measure, indicate pre scores, post scores, sample sizes, and statistical testing, if applicable. Add additional rows if necessary.

Outcome Measure 1:

Enter survey(s) or data collection tool(s) and age group(s) here.

Outcome Measure Details:
Enter pre scores, post scores, sample sizes, and statistical testing, if applicable. Add additional Outcome Measures & Details as needed.

MT2 Food Resource Management Behaviors

For this indicator, specify the survey(s) or data collection tool(s) and age group(s) surveyed: For each outcome measure, indicate pre scores, post scores, sample sizes, and statistical testing, if applicable. Add additional rows if necessary.

Outcome Measure 1:
Enter survey(s) or data collection tool(s) and age group(s) here.

Outcome Measure Details:
Enter pre scores, post scores, sample sizes, and statistical testing, if applicable. Add additional Outcome Measures & Details as needed.

MT5 Nutrition Supports Adopted

Adoption
Takes place when SNAP-Ed sites or settings put into effect an evidence-based policy, systems, environmental change, or associated promotion. Nutrition supports can include one or more PSE changes, often including favorable procurement or meal preparation activities or others that expand access and promote healthy eating. Documentation (direct observation, photographic evidence, repeated self-assessments or surveys) or interviews with key informants to 1) confirm the uptake of the PSE change in the setting, 2) learn of unexpected benefits or spinoffs, or 3) learn of challenges, course-correct, and improve the intervention if needed.

Policy, systems, environmental changes, or associated promotion adopted

Policy, system, or environmental change 1:
Enter PSE change uptake that was confirmed here.

Policy, system, or environmental change 1 Details:
Enter how PSE change uptake was confirmed; unexpected benefits or spinoffs; and challenges, course-corrections, and intervention improvements here, as applicable. Add additional policy, system, or environmental changes as needed.

ST 7 Organizational Partnerships

Report the number of organizational partnerships, councils, or collaboratives in qualified SNAP-Ed settings that organize themselves around a common agenda, mission, or strategic plan to adopt nutrition or physical activity practices, supports and/or standards.

For selected partnerships, describe the partnership maturity levels, partnership accomplishments and lessons learned.

Partnership 1:

Enter the name and number of organizational partnerships, councils, or collaboratives in qualified SNAP-Ed settings that organize themselves around a common agenda, mission, or strategic plan to adopt nutrition or physical activity practices, supports and/or standards here.

Partnership 1 Details:

Describe the partnership maturity levels, partnership accomplishments and lessons learned here. Add additional partnerships as needed.

ST 8 Multi-Sector Partnerships and Planning

Report the number of State SNAP-Ed programs or local geographic areas with multi-sectoral partnerships that include at least 5 diverse sector representatives (who reach low-income audiences through their services) that address nutrition or physical activity practices or standards or other elements contained within the evaluation framework.

For selected partnerships, describe the types and number of organizations or individuals per sector represented, documented level of multi-sectoral integration of the partnership, documented level of active engagement of the partnership, and level of influence of SNAP-Ed in the partnership.

Partnership 1:

Enter the name and number of State SNAP-Ed programs or local geographic areas with multi-sectoral partnerships that include at least 5 diverse sector representatives (who reach low-income audiences through their services) that address nutrition or physical activity practices or standards or other elements contained within the evaluation framework here.

Partnership 1 Details:
Describe the types and number of organizations or individuals per sector represented, documented level of multi-sectoral integration of the partnership, documented level of active engagement of the partnership, and level of influence of SNAP-Ed in the partnership here. Add additional partnerships as needed.

R2 Fruits and Vegetables

For this indicator, specify the survey(s) or data collection tool(s) and age group(s) surveyed. Report the number or % or the low-income population (within 185% of Federal poverty level) who ate fruits one or more times per day and vegetables one or more times per day.

Outcome Measure 1:
Enter survey(s) or data collection tool(s) and age group(s) here.

Outcome Measure Details:
Enter the number or % or the low-income population (within 185% of Federal poverty level) who ate fruits one or more times per day and vegetables one or more times per day here. Add additional Outcome Measures & Details as needed.

Additional Information to Report More SNAP-Ed Framework Outcomes

Other Outcome Indicator 1:
Report other outcome indicators here.

Other Outcome Indicator Details:
Enter how results were measured here. Add additional Outcome Indicators as needed.

Checklist for Evidence-Based Approaches

The purpose of this 4-step checklist is to help States and Implementing Agencies meet SNAP-Ed evidence-based program and practice requirements. 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." Evidence-based allowable uses of SNAP-Ed funds include conducting and evaluating education and social marketing interventions, and implementing and measuring policy, systems, and environmental change strategies that will make it easier for low-income persons to make healthy dietary choices and be physically active.

An evidence-based approach may include a mix of strategies (broad approaches to intervening on obesity prevention target areas) and interventions (specific set of evidence-based, behaviorally–focused activities and/or actions to promote healthy eating and active lifestyles). *The SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States* at https://snapedtoolkit.org/ contains a listing of many evidence-based strategies and interventions in child care, school, community, and family settings. The Toolkit is the starting point for choosing evidence-based obesity prevention programs for SNAP-Ed.

Categories of Evidence-Based Approaches

FNS has identified three categories of evidence for strategies and interventions along a continuum: research-tested, practice-tested, and emerging. These categories vary according to scientific rigor, evaluation outcomes, research translation, and degree of innovation. Each category along the continuum is vital for expanding and building the knowledge base on effective practices. Movement along the continuum requires that programs are fully implemented and evaluated.

Research-tested: The approach is based upon relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence, and other published studies and evaluation reports that demonstrate significant effects on individual behaviors, food/physical activity environments, or policies across multiple populations, settings, or locales.

Examples: Color Me Healthy, Baltimore Healthy Stores, Nutrition and Physical Activity Self-Assessment for Child Care (NAP SACC)

Practice-tested: The approach is based upon published or unpublished evaluation reports and case studies by practitioners working in the field that have shown positive effects on individual behaviors, food/physical activity environments, or policies.

Examples: Eat Well Play Hard in Child Care Settings (New York), Empowering Healthy Choices in Schools and Homes (Georgia)

Emerging: The approach includes community- or practitioner-driven activities that have the potential for obesity prevention, but have not yet been formally evaluated for obesity prevention outcomes. Evaluation indices may reflect cultural or community-informed measures of success.

Examples: Eat Smart in Parks (Missouri), Fit Business Kit Worksite Program (California)

Intervention or Strategy Name:

Step 1	Many strategies or interventions have already been reviewed for their effectiveness for nutrition education and obesity prevention. To begin, check if the approach is recognized as evidence-based by at least one government or scientific agency, or listed in a registry reviewed by experts and researchers in nutrition education and obesity prevention.	Yes	No
	National Collaborative for Childhood Obesity Research: SNAP-Ed Interventions Toolkit https://snapedtoolkit.org/		
	Food and Nutrition Service: Nutrition Evidence Library https://nesr.usda.gov/		
	National Cancer Institute: Research-Tested Interventions Program http://rtips.cancer.gov/rtips/programSearch.do		
	U.S. Department of Health and Human Services: Guide to Community Preventive Services http://www.thecommunityguide.org/index.html		
	U.S. Department of Health and Human Services: Rural Obesity Prevention Toolkit https://www.ruralhealthinfo.org/community-health/obesity		
	What Works for Health: Policies and Programs to Improve Wisconsin's Health http://whatworksforhealth.wisc.edu/		
	University of North Carolina Center of Excellence for Training and Research Translation http://www.centertrt.org/?p=interventions_overview		
	Other (specify, attach with submission): _____		
Notes/Comments:			

If you answered to yes to any of the above, congratulations, your strategy or intervention has been certified as evidence-based! If you answered no, go to Step 2.

Step 2	Search for evaluation results for your intervention or strategy with a university or public health partner using the following guidelines.	Yes	No
A	Is there at least one peer-reviewed[7], scientific journal article that concludes your approach has significant positive impacts on individual behaviors, food/physical activity environments, or obesity prevention policies? Journal, article title, publication date: _____		
B	Was the approach tested and compared against some type of control condition present (e.g., a similar venue or population that does not receive the intervention or strategy) with significant positive effects?		
Notes/Comments (including applicable supporting files to be attached with submission):			

If you answered yes to both items A and B, your approach is research-tested. Else, go to item C.

Step 2	(continued)	Yes	No
C	**Is there at least one evaluation report or case study that shows your approach has positive changes in individual behaviors, food/physical activity environments, or obesity prevention policies?** **Indicate title of report or study:** _____ **Please attach files in the submission**		
Notes/Comments (including applicable supporting files to be attached with submission):			

If you answered yes to item C, your approach is practice-tested. Else, go to Step 3.

[7] Peer-reviewed articles have been critiqued by the author's peers, who are experts in a given field or academic discipline. Articles published in peer-reviewed journals meet standards of excellence in scientific research. Examples of peer-reviewed journals with SNAP-Ed articles include: *Journal of Nutrition Education and Behavior* and *Preventing Chronic Disease*.

Step 3	Many strategies or interventions have the potential for obesity prevention, but have not been thoroughly tested. The following criteria will help categorize an emerging approach.	Yes	No
A	Does the approach align with the ***Dietary Guidelines for Americans*** http://health.gov/DietaryGuidelines/, the ***Physical Activity Guidelines for Americans***, http://health.gov/paguidelines/ and/or **Healthy People 2020 objectives for Nutrition and Weight Status** http://www.healthypeople.gov/2020/topics-objectives/topic/nutrition-and-weight-status/objectives?topicId=29?		
B	Does the approach reflect the budgetary and time constraints of the low-income population?		
C	Does the approach reflect solutions that would make healthy eating and physically active lifestyles easier and more appealing to SNAP-Ed participants? (Solutions that make healthy choices easier may include changes in food retail, food distribution, or recreation facilities, including hours of operation, price, promotion, placement, marketing, communication, and related operations and policies)		
D	Will the approach be evaluated for changes in individual behaviors, food/physical activity environments, or obesity prevention policies?		
If you answered yes to items A – D, go to item E. Else, your approach is not considered emerging for SNAP-Ed.			
E	Does the approach reflect the social, cultural, and/or linguistic needs and resources of the low-income population(s) served?		
F	Does the approach address the results and implications of a State or community needs assessment?		
G	Does the approach address State or local priorities/strategic plans?		
Notes/Comments (including applicable supporting files to be attached with submission):			

Step 4	For implementation purposes: There are different expectations for program implementers when choosing among research-tested, practice-tested, or emerging approaches. Research-tested programs, and some practice-tested programs, have existing guidelines, materials, and tools for implementers to use upon appropriate training on program delivery. For certain emerging programs, there may be a need for development and audience testing of new strategies and concepts, which may be cost prohibitive. For each of the following criteria, you can use the symbols to the right to help identify what is required, preferred, or possible.			
Required ● Preferred ◔ Possible ◠		Research Tested	Practice-Tested	Emerging
1	Use SMART (simple, measurable, attainable, realistic, timely) objectives	●	●	●
2	Justify that the reach of the SNAP-Ed population warrants the cost of the intervention	●	●	●
3	Justify the use of a novel or creative approach	◠	◔	●
4	Use existing materials, implementation guides, and resources	●	◔	◠
5	Conduct formative research, including audience testing	◠	◔	●
6	Conduct a limited duration pilot test, and refine strategy	◠	◔	●
7	Gain stakeholder input and put into place partnership agreements to support implementation and sustainability.	●	◔	◔
8	Ensure facilities and support provided by partners are available on a consistent basis	●	◔	◔
9	Train staff to implement the intervention	●	◔	◠
10	Assess that staff have a clear understanding of the nature of the intervention, how it is being implemented, and their role	●	◔	◔
11	Determine whether implementation occurs as intended	●	◔	◔
12	Replicate across multiple populations and venues	●	◔	◠
13	Evaluate outcomes with appropriate follow-up period based on program model	◔	◔	●

References:

Baker, S; Auld, G; MacKinnon, C; Ammerman, A; Hanula, G; Lohse, B; Scott, M; Serrano, E;

Tucker, E; and Wardlaw, M. Best Practices in Nutrition Education for Low-Income Audiences (2014).

Brennan L, Castro S, Brownson RC, Claus J, Orleans CT. Accelerating evidence reviews and broadening evidence standards to identify effective, promising, and emerging policy and environmental strategies for prevention of childhood obesity. Annu Rev Public Health 2011;32:199-223

Cates, S., Blitstein, J., Hersey, J., Kosa, K., Flicker, L., Morgan, K., and Bell, L. Addressing the Challenges of Conducting Effective Supplemental Nutrition Assistance Program Education (SNAP-Ed) Evaluations: A Step-by-Step Guide. Prepared by Altarum Institute and RTI International for the U.S. Department of Agriculture, Food and Nutrition Service, March 201.

Kaplan GE, Juhl AL, Gujral IB, Hoaglin-Wagner AL, Gabella BA, McDermott KM. Tools for Identifying and Prioritizing Evidence-Based Obesity Prevention Strategies, Colorado. Prev Chronic Dis 2013; 10:12027

Checklist for Public Health Approaches

The Healthy Hunger-Free Kids Act of 2010 transformed SNAP-Ed into a nutrition education and obesity prevention grant program, explicitly adopting obesity prevention as a major emphasis and allowing comprehensive community and public health approaches for low-income populations. The purpose of this checklist is to help States and Implementing Agencies use a public health approach for planning and implementing SNAP-Ed projects. Following a general outline for program planning in public health, there are three core steps: 1) engagement and assessment, 2) program development and implementation, and 3) monitoring and evaluation. This checklist provides examples of each of these steps. The checklist begins by describing the types of SNAP-Ed policy, systems, and environmental change strategies and interventions, and then provides steps and examples of program planning in public health. Please keep in mind that in practice, these processes are more parallel and iterative, than they are linear. SNAP-Ed programming may include 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 (SEM) and may target individual factors, environmental settings, sectors of influence, and social/cultural norms and values.

Categories of Public Health Approaches

Selected strategies should respond to unmet community need for public health approaches that will make it easier for low-income children and families to engage in lifelong behavioral changes. Policies, systems, and environmental (PSE) approaches intend to supplement individual, group and community-based educational strategies used by nutrition and physical activity educators in a multi-component program delivery model. Education combined with PSE is more effective than either strategy alone in preventing overweight and obesity.

SNAP-Ed providers can implement community and public health approaches that affect a large segment of the population rather than solely targeting the individual or a small group. Community and public health approaches include three complementary and integrated elements: education, marketing/promotion, and policy, systems, and environmental approaches. Using these three elements helps create conditions where people are encouraged to act on their education and awareness and where the healthy choice becomes the easy and preferred choice, which is facilitated through changes in policy, systems, and the environment. By focusing activities on settings with large proportions of low-income individuals and using evidence-based interventions that are based on formative research with SNAP-Ed audiences, public health approaches can reach large numbers of low-income Americans and might produce meaningful impact.

Policy: A written statement of an organizational position, decision, or course of action. Ideally policies describe actions, resources, implementation, evaluation, and enforcement. Policies are made in the public, non-profit, and business sectors. Policies will help to guide behavioral changes for audiences served through SNAP-Ed programming.

Example: A school that serves a majority low-income student body writes a policy that allows the use of school facilities for recreation by children, parents, and community members during non-school hours. The local SNAP-Ed provider can be a member of a coalition of community groups that work with the school to develop this policy.

Systems: Systems changes are unwritten, ongoing, organizational decisions or changes that result in new activities reaching large proportions of people the organization serves. Systems changes alter how the organization or network of organizations conducts business. An organization may adopt a new intervention, reallocate other resources, or in significant ways modify its direction to benefit low-income consumers in qualifying sites and communities. Systems changes may precede or follow a written policy.

Example: A local food policy council creates a farm-to-fork system that links farmers and local distributors with new retail or wholesale customers in low-income settings. The local SNAP-Ed provider could be an instrumental member of this food policy council providing insight into the needs of the low-income target audience.

Environmental: Includes the built or physical environments which are visual/observable, but may include economic, social, normative or message environments. Modifications in settings where food is sold, served, or distributed may promote healthy food choices. Signage that promotes the use of stairwells or walking trails may increase awareness and use of these amenities. Social changes may include shaping attitudes among teachers or service providers about time allotted for physical activity breaks. Economic changes may include financial disincentives or incentives to encourage a desired behavior, such as purchasing more fruits and vegetables. Note that SNAP-Ed funds may not be used to provide the cash value of financial incentives.

Example: A food retailer serving SNAP participants or other low-income persons institutes in-store signage with free educational materials to encourage consumer selection of healthier food options based on the Dietary Guidelines for Americans and MyPlate. A SNAP-Ed provider can provide consultation and technical assistance to the retailer on preferred educational materials and positioning of signage to reach the target audience through this channel.

Step 1. Engagement and Assessment: Findings from assessing the needs and assets of local settings should inform the selected PSE approach. The following are common components of stakeholder engagement and community assessments.	Yes	No	Additional Info.
Collect and analyze qualitative and quantitative data from primary and secondary sources. Primary data is data that one collects directly through surveys, interviews, and focus groups; it often adds local or unique information difficult to obtain through secondary data. Secondary data is existing data which has already been collected by someone else. Previous evaluation data may also be useful to the assessment.			
Incorporate stakeholder (e.g. local decision makers, program partners, program participants) priorities and local initiatives to determine the appropriate strategies.			
Engage communities of focus and gain an understanding of current issues of importance and relevance to them.			
Form community advisory groups, or other bodies to facilitate and maintain stakeholder input.			
Coordinate with other FNS-funded programs such as the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), the Child Nutrition Programs which include the National School Lunch Program, and Summer Food Service Program, to help ensure SNAP-Ed fills in gaps left by other nutrition programs.			
Partner with other existing services and resources at the national, State, and local levels to further the reach and impact of SNAP-Ed activities. Developing and enhancing partnerships is critical to instituting policy, systems, and environmental change strategies in communities.			
Assess settings that are conducive to reaching a large segment of the population, which otherwise would be challenging to reach one person at a time.			
Assess areas with barriers to the availability and/or accessibility of healthy options (e.g. access to healthy and affordable grocery stores, safe pedestrian walkways, and parks and open spaces).			
Determine what will serve as baseline data.			

Step 2. Program Development and Implementation: The program design is based on the conclusions drawn in the Engagement and Assessment phase, and developed as an appropriate response to the identified issues. Be sure to build goals and objectives which reflect the socio-ecological model (SEM). The following are components of program development and implementation used in public health planning processes.	Yes	No	Additional Info.
Identify target population(s) to work with for the intervention.			
Identify appropriate PSE approaches, which complement direct education and social marketing, based on the results from Step 1. Engagement and Assessment.			
Select and align goals and SMART (simple, measurable, attainable, realistic, timely) objectives in at least two levels of the SEM with the Multi-Level Frameworks, such as the: SNAP-Ed Evaluation Framework https://snapedtoolkit.org/framework/index/ CDC Obesity Prevention Framework http://www.cdc.gov/pcd/issues/2012/11_0322.htm, or NIFA Community Nutrition Education Logic Model https://nifa.usda.gov/resource/community-nutrition-education-cne-logic-model			
Create a logic model that clearly links each component of the policy and program changes to one another, and connects these to the overall, long-term outcome of improved nutrition, physical activity, and maintenance of normal body weight.			
Select and train implementers.			
Facilitate adoption, implementation, and maintenance.			
Determine which existing materials, implementation guides, and resources are appropriate to utilize.			
Create and develop additional resources, products, and project materials.			
Communicate progress to stakeholders.			

Step 3. Evaluation: The changes that occur as a result of the strategies used can be observed at the individual, environmental and systems levels. Evaluating SNAP-Ed interventions using outcome measures that are specific to each intervention and the overall impact using appropriate measures/indicators. The following are components of evaluation commonly used in public health interventions.	Yes	No	Additional Info.
Choose evaluation outcomes with realistic and appropriate measures.			
Collect evaluation data that will inform decisions to be made throughout implementation and later, maintenance/improvement of the project.			
Conduct a process evaluation.			
Determine whether implementation occurs as intended.			
Describe the reach of the intervention in terms of settings or neighborhoods. For example, the number of SNAP-Ed eligible individuals that benefitted from the change(s) during the period assessed. Refer to RE-AIM (Reach, Effectiveness, Adoption, Implementation, and Maintenance) model in the SNAP-Ed Evaluation Framework.			
Conduct an outcome evaluation.			
Continue to monitor outcomes and make continuous program improvements.			
Replicate across multiple populations and venues, making adjustments according to context.			
Communicate and disseminate results to stakeholders and funders.			

Policy Systems, and Environmental (PSE) Approaches

Examples of PSE approaches that complement direct or indirect nutrition education. Check the corresponding box for those that have the potential to fit your project. This list is not exhaustive; please write-in other proposed approaches for review.	Yes	No
Use community or place-based messaging to promote access and appeal for healthy foods, beverages, and/or physical activity.		
Use digital or social media to promote access and appeal for healthy foods, beverages, and/or physical activity.		
Mobilize community partnerships around healthy eating and active living.		
Develop wellness policies in schools, after-school, or child care settings sites that support children and family nutrition and health.		
Participate in State or local food policy councils.		
Create healthy corner stores or food retail policies and organizational practices.		
Develop nutrition standards at emergency food distribution sites.		
Develop point-of-purchase marketing/signage at food retailers or food distribution sites.		
Providing training on Smarter Lunchroom Movements in school cafeterias.		
Develop systems that refer and link SNAP recipients to SNAP-Ed, and vice versa.		
Improve the quality of foods and beverages sold in vending machines.		
Provide training or technical assistance to health or community professionals on obesity prevention.		
Develop healthy procurement policies, healthy nutrition standards, and/or signage for senior nutrition centers and other congregate meals providers.		
Promote farmers markets, including SNAP at farmers markets.		
Create work-site or church-based SNAP-Ed programs.		
Link farms to institutions through farm stands or farm-to-where-you-are initiatives.		
Cultivate community or school gardens.		
Allow for the use of school facilities for recreation during non-school hours.		
Promote access/appeal, or policy changes to support physical activity or exercise.		
Other, specify:		

Budget Detail Template

The Budget Detail Templates below are for illustrative purposes only. Please use the fillable Excel version of this template available at the SNAP-Ed Connection at https://snaped.fns.usda.gov/materials/mountain-plains-region-budget-template. Template developed by Mountain Plains Region.

In State Travel Trip #1

Trip Purpose:

Travel location:

Staff Positions Traveling:

Category	Number of Staff	Cost	Trip Mileage or Duration	Total Cost
Mileage		(Per Mile)	Miles Roundtrip	Total $
Lodging		(Per Day)	# Days	Total $
Per Diem		(Per Day)	# Days	Total $

Total Cost Trip #1 $

In State Travel Trip #2

Trip Purpose:

Travel location:

Staff Positions Traveling:

Category	Number of Staff	Cost	Trip Mileage or Duration	Total Cost
Mileage		(Per Mile)	Miles Roundtrip	Total $
Lodging		(Per Day)	# Days	Total $
Per Diem		(Per Day)	# Days	Total $

Total Cost Trip #2 $ -

In State Travel Trip #3

Trip Purpose:

Travel location:

Staff Positions Traveling:

Category	Number of Staff	Cost	Trip Mileage or Duration	Total Cost
Mileage		(Per Mile)	Miles Roundtrip	Total $
Lodging		(Per Day)	# Days	Total $
Per Diem		(Per Day)	# Days	Total $

Total Cost Trip #3 $-

In State Travel Trip #4

Trip Purpose:

Travel location:

Staff Positions Traveling:

Category	Number of Staff	Cost	Trip Mileage or Duration	Total Cost
Mileage		(Per Mile)	Miles Roundtrip	Total $
Lodging		(Per Day)	# Days	Total $
Per Diem		(Per Day)	# Days	Total $

Total Cost Trip #4 $

Out of State Travel Trip #1

Trip Purpose:

Travel location:

Staff Positions Traveling:

Category	Number of Staff	Cost	Trip Mileage or Duration	Total Cost
Mileage		(Per Mile)	Miles Roundtrip	Total $
Lodging		(Per Day)	# Days	Total $
Per Diem		(Per Day)	# Days	Total $

Total Cost Trip #1 $

Out of State Travel Trip #2

Trip Purpose:

Travel location:

Staff Positions Traveling:

Cost Type	Number of Staff	Cost Basis	Variable	Cost Total
Air Travel		Air Fare	Roundtrip	Total
Lodging		Cost Per Day	# Days	Total
Ground Transportation		Cost Per Day	# Days	Total
Registration Fee		Registration Fee		Total

Total Cost Trip #2 $

Out of State Travel Trip #3

Trip Purpose:

Travel location:

Staff Positions Traveling:

Cost Type	Number of Staff	Cost Basis	Variable	Cost Total
Air Travel		Air Fare	Roundtrip	Total
Lodging		Cost Per Day	# Days	Total
Ground Transportation		Cost Per Day	# Days	Total
Registration Fee		Registration Fee		Total

Total Cost Trip #3 $

Out of State Travel Trip #4

Trip Purpose:

Travel location:

Staff Positions Traveling:

Cost Type	Number of Staff	Cost Basis	Variable	Cost Total
Air Travel		Air Fare	Roundtrip	Total
Lodging		Cost Per Day	# Days	Total
Ground Transportation		Cost Per Day	# Days	Total
Registration Fee		Registration Fee		Total

Total Cost Trip #4 $

Supplies

Item	Explanation (if needed)	Price/Item	Quantity	Total
				$
				$
				$
				$
				$
				$
Total				$

Total Salary and Fringe for Each Position

Title					
Educator		100%	$35,000.00	$10,000.00	$45,000.00
					$
					$
					$
					$
					$
					$
					$
					$
					$
					$
Total			$ 35,000.00	$ 10,000.00	$ 45,000.00

Nutrition Educational Enhancements – FFY

Item	Audience	Use	Message	Cost/item
			Total	$

Computer Inventory

FFY	Region	County	Name

Executive Summary Example

Massachusetts Executive Summary 2017 (Example)

2017 Plan Highlights

To ensure that program activities are accessible to the maximum extent possible, eligible participants are notified, about SNAP-Ed program activities which are held in local communities, via mailings, posters/flyers posted on the TAO lobby TVs and hard copy posters/flyers posted in the lobby of the TAOs.

TAO or DTA staff can refer participants to scheduled activities or the participants can self- refer. This referral system and the ensuing coordination is overseen by the DTA Program Coordinators. In some locations, it is not possible to schedule SNAP-Ed activities at TAOs, due to space restrictions, therefore sites at community agencies are developed, as host sites offering space, where the activities are held. The DTA Program Coordinators are the liaisons connecting the participants to the host site and the implementing agencies conduct the activities.

DTA has also expanded its use of electronic media for SNAP clients. Most recently, there has been the development of the mobile APP. The mobile APP is in Stage I release and, as a new format, will offer clients the ability to obtain EBT balances, view notices, and receive alerts and appointment reminders, among other personalized case data. In future releases, the mobile APP will include message "pushes", and have the capacity to provide clients with geo-specific information about nutrition education and farmer's market opportunities available in real time near where they live. In this way, the reach will be expanded for nutrition education program participation.

The SNAP-Ed Blog (www.healthyfoodsinasnap.wordpress.com) and the weekly Tips Line which UMass NEP had developed for DTA, and advertised at TAOs through a Rack Card called "Spend a minute, save a dollar", will no longer be operated by UMass. The Tips Line was a call in phone line which is an outdated mode of communication. However, two years worth of these phone message scripts, in English and Spanish, are being transferred to DTA for transitioning this format to be either texts or tweets or linked to the mobile APP. The SNAP-Ed Blog, with its historical entries, will also be transferred to DTA and housed in our website and/or linked to the mobile APP. UMass NEP will continue to supply DTA with nutrition-related content, for the Blog on a monthly basis.

The two smaller Implementing Agencies, Ascentria and Bay Cove/Kit Clark Senior Services, each specialize in unique populations. Ascentria serves the Refugee community in Springfield/Westfield areas and Bay Cove/Kit Clark serves the elderly population in the Boston area. Through their expertise in understanding the learning capacity and modalities for their clients, they have recognized key points within SNAP-

Ed curriculum which could be honed for a more relevant nutrition education learning experience. Thus, each agency is proposing to explore and develop new materials to address these concerns.

(see section i. Development of New Educational Materials)

SOS_CM moved their facility from South Boston to Dorchester. The increase in rent is indicated in the Lease found in Appendix I.

DTA is exploring the implementation of a Social Marketing Campaign. The approach and terms for using either an existing evidence-based intervention from the Toolkit or leveraging funds with other agencies and/or a subcontract agreement with a marketing firm have not been finalized. We request $300,000 to be reserved for this purpose. We anticipate that plans for this will be fully developed within the first quarter of FFY 2017.

The FFY 2017 Plan requests $4,741,045 and $511,255 in carry in funding from prior year for a total of $5,252,300.

The following charts summarize the overall Nutrition Education activities for Direct, Indirect, and Policy, Systems and Environmental changes.

Summary of Overall Nutrition Education Activities

Project Activities are listed in detail on the Planned Direct and Indirect Activities Spreadsheets included in Appendix A. These spreadsheets provide information about how and where the activities will be delivered including: DTA region, collaborator name, type of delivery site, audience, activity type, number of activities to be conducted, and number of individuals/contacts to be reached.

Projected numbers of activities, contacts and participants are summarized below:

Direct Methods

Agency	Activity	Projected Number of Individuals	Projected Number of Contacts
ACS	7 Single Session Lessons	35	35
SOS/Cooking Matters	262 Single Session Lessons	2,358	2,358
UMass NEP	449 Single Session Lessons	5,884	5,884
ACS	48 Series = 335 Lessons	730	4,960
BC/KCSS	80 Series = 240 Lessons	1,030	1,854
SOS/Cooking Matters	77 Series = 462 Lessons	770	4,620
UMass NEP	2,545 Series = 10,723 Lessons	52,057	217,850
	Total Direct Individuals/Contacts	62,864	237,561

OVERALL Direct: 3,468 Series/Single Sessions, 12,478 Lessons.

Indirect Methods

Implementing Agency	Activity	Projected Number of Individuals To Be Reached
ACS	6 Farmers' Market Food Demos	120
ACS	24 Other Food Demos	120
ACS	1 Other Display	100
ACS	Parent Newsletters	299
UMass NEP	75 TAO Food Demonstrations	2,430
UMass NEP	8 TAO Displays	16,609
UMass NEP	TAO Newsletters, Handouts, Daily	7,609
UMass NEP	108 Farmers' Market Food Demos	8,410
UMass NEP	193 Other Displays	17,155
UMass NEP	Parent Newsletters and Handouts	59,786
UMass NEP	School Enrichment Materials	96,565
	Total Indirect individuals	209,203

Policy, Systems, Environmental Changes

Implementing Agency	Type of Policy, System, or Environmental Change	Channel/ Setting	Number of Initiatives	Projected # of Individuals Reached
ACS	Nutrition Support Change	Eat	1	20
ACS	Nutrition Support Change	Live	1	40
ACS	Physical Activity Support Change	Play	1	150
ACS	Partnership: J.J. Duggan School	Learn	1	n/a
BC/KCSS	Nutrition Support Change	Live	2	415
BC/KCSS	Physical Activity Support Change	Play	1	25
BC/KCSS	Partnership: St Cecilia's	Live	1	n/a
SOS/CM	Nutrition Support Change	Shop	1	131
SOS/CM	Partnership: TBD	TBD	1	n/a
UMass NEP	Nutrition Support Change	Learn	11	12,784
UMass NEP	Nutrition Support Change	Shop	1	500
UMass NEP	Physical Activity Support Change	Learn	9	7,571
	Total		31	21,636

Oregon Executive Summary 2017 Example

Supplemental Nutrition Assistance Program – Nutrition Education (SNAP-Ed) Federal Fiscal Year (FFY) 2017

Executive Summary

On behalf of the State of Oregon, the SNAP-Ed Plan for fiscal year 2017 is dedicated to improving the likelihood that persons eligible for SNAP will make healthy choices within a limited budget and choose active lifestyles consistent with the current Dietary Guidelines for Americans. Many essential partnerships within the state contribute to the overall effort, which is led by the Oregon Department of Human Services (DHS) in partnership with the implementing agency, Oregon State University (OSU).

Highlights of the Plan:

Strong statewide partnerships: Oregon DHS is proposing to move the SNAP-Ed program into a three-year State plan. The statewide partnerships have continued to develop and strengthen, ensuring that collaboration is occurring on multiple projects and is maximizing joint program reach. Regularly scheduled quarterly SNAP-Ed stakeholder meetings, individual meetings with each agency or organization, plus a one-day retreat, have created a strong three-year outcome focus such as: writing grants including partners; creating conference presentations together; inviting staff from different agencies to shared trainings; and providing time and effort from multiple agencies to joint SNAP-Ed projects and opportunities.

As a result, DHS and OSU staff will be coordinating new stakeholder taskforces to help steer the strategies and initiatives between our partners in targeted focus areas: Smarter Lunchrooms, refugee populations, early childhood and childcare, and older adults. We will use a 3-phase model based on the SNAP-Ed Evaluation Framework that will help assess and guide the taskforces.

Oregon Hub model: The Oregon Hub model is in its third year. This model is well-suited to the development of a data-driven multi-year Plan: individual Hub summaries reflect a thoughtful progression of strategies and interventions selected by audience, site, and objectives. Taken as a whole, 90 Hub summaries show common themes and strategies that have local partner support and buy-in. The core of each Hub is centered in one of three settings: school, family/community, or early childhood and childcare. The Hubs work towards a combination of policy, system and/or environmental (PSE) strategies in conjunction with direct education and social marketing. Each Hub is at a different stage of development and has been classified as formative, building, or maintenance stage. PSE strategies in Hubs are categorized by stage: assess, implement, or maintain.

Oregon Assessment Tools: A variety of assessment tools are available to assist with beginning PSE efforts. Three of these tools are Oregon-grown and are part of the

SNAP-Ed Interventions Toolkit. The Oregon Food Bank (with OSU) created the Healthy Pantry Toolkit. These categories provide a system of progression for work in Hubs overall and in specific PSE efforts. The Oregon SNAP-Ed Toolkit for Strategies and Interventions provides evidence-based curricula choices for utilization within each Hub for direct education, and fidelity checklists facilitate the delivery of curriculum with fidelity.

Oregon SNAP-Ed signature programs: The Food Hero social marketing campaign, focusing on research-based, participant-directed fruit and vegetable messages through high-visibility communication channels, has been widely adopted by other State and local organizations, increasing its reach and application throughout the State. Adapting the recipes for use by older adults is a goal for 2017.

Increased focus on evaluations: In 2017, The Growing Healthy Kids impact evaluation will be completed; a comprehensive randomized outcome evaluation of Food Hero in four counties will be finished; outcome evaluations of direct education; Food Hero survey evaluations; and a thorough reassessment of overall evaluation strategies will be conducted in FFY 2017.

For this three-year Plan proposal, Oregon SNAP-Ed will explore ways to utilize the SNAP-Ed Evaluation Framework and Interpretive Guide to answer the question: What effect does integration of direct education, social marketing, and PSE have on eating and physical activity behavior within the Hub model?

Fiscal request: The amount of funding requested is $7,264,717 (FFY 2017 FNS allocation) plus $720,000 in carry-in funds.

In summary, Oregon SNAP-Ed in FFY 2017 will:

Maintain close linkages with State and community partners;

Reach youth, adults, and families through multiple channels within local and regional Hubs;

Deliver messages multiple times through direct education, and social marketing strategies;

Assess partner and environmental contexts and readiness to change through use of assessment tools and strategies, resulting in sustained PSE interventions that, in conjunction with education and messaging, maximize the likelihood of behavior change that is maintained over time;

Refine and improve program content and quality, based on participant feedback, evaluation data, and agency input;

Select and deliver curricula and materials that are evidence-based with fidelity;

Train faculty, staff, volunteers, and partners who will extend SNAP-Ed programming in effective assessment tools, program delivery, evaluation, and PSE implementation.

Appendix C. SNAP-Ed Connection Website

SNAP-Ed Connection https://snaped.fns.usda.gov/ is a resource website for SNAP-Ed administrators, State agencies, Implementing Agencies, educators, and others involved in the SNAP-Ed program.

Contact SNAP-Ed Connection: snap-edconnection@fns.usda.gov

SNAP-Ed Success Stories

Success stories from around the country are published on the website. All states are welcome to submit as many stories as they would like. States are encouraged to use the success stories tip sheet to write their stories. The tip sheet can be found at https://snaped.fns.usda.gov/success-stories. All stories should include evaluation and outcomes information. Stories are copyedited prior to publication.

SNAP-Ed Library

The SNAP-Ed Library contains materials created with SNAP-Ed funding and resources that may be helpful to SNAP-Ed programs. Some of the materials include:

- Curricula
- Evaluation tools
- State impact reports

It is a collaborative tool to allow States to share information so that there is no duplication of efforts across the program. FNS encourages State and local projects to submit materials that they have developed at https://snaped.fns.usda.gov/node/add/library_material. All materials are reviewed according to the SNAP-Ed Library Inclusion Criteria https://snaped.fns.usda.gov/snap-ed-library/inclusion-criteria.

SNAP-Ed Connection e-Bulletin

The e-Bulletin brings you updates to SNAP-Ed Connection, new resources, and spotlights of SNAP-Ed programs from around the country. Subscribe at https://public.govdelivery.com/accounts/USFNS/subscriber/new?topic_id=USFNS_191.

Photo Gallery

The Photo Gallery is a collection of copy-right free images that can be used in social marketing campaigns, brochures, and other SNAP-Ed materials. Find photos at https://snaped.fns.usda.gov/photo-gallery

National SNAP-Ed

SNAP-Ed Plan Guidance and Plan Templates can be found at https://snaped.fns.usda.gov/program-administration/guidance-and-templates.

State SNAP-Ed Information

State SNAP-Ed information can be found at https://snaped.fns.usda.gov/state-snap-ed-programs, including State contact information and websites. States should regularly check the agency information to make sure that it is up-to-date and inform their FNS Regional SNAP-Ed Coordinator if the information needs to be updated.

Appendix D. Guidelines for Nutrition Education Materials

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. Please review *Other Federal Policies Relevant to Administration of SNAP-Ed: Federal Royalty Rights* for additional information and CFR citation.

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 SNAP-Ed Library at https://snaped.fns.usda.gov/snap-ed-library/submission-form.

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 (organization's 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 (organization's name)."

Guidelines for Use of the USDA and SNAP Logos

Use of the USDA logo must follow requirements as stated in the *USDA Visual Standards Guide*. This guide provides detailed requirements for standards such as logo colors, size, and placement within documents. The guide can be found at https://www.usda.gov/sites/default/files/documents/visual-standards-guide-january-2013.pdf.

Use of the SNAP logo must follow requirements as stated in the *Supplemental Nutrition Assistance Program (SNAP) Using the SNAP Logo* guide. The guide is located at https://fns-prod.azureedge.net/sites/default/files/snap/SNAP-Logo-Guidance.pdf.

Nondiscrimination Statement Use

The nondiscrimination statement lists all of the prohibited bases for discrimination contained in the USDA Civil Rights Policy Statement. Materials that should have the nondiscrimination statement include print (e.g., brochures, newsletters, education curricula, etc.) and non-print (e.g., audio, videos, websites, etc.) forms of communication. Documents developed, adapted, or reprinted by State and Implementing Agencies receiving financial assistance from FNS must have the following shortened nondiscrimination statement: **"This institution is an equal opportunity provider."** when used specifically for SNAP-Ed. In general, anything that features USDA logos, such as MyPlate, or communicates SNAP-Ed programming information, including times, dates, and locations as well as objectives and outcomes of classes or activities, falls into this category. Moreover, all communication must comply with Section 508 (meet accessibility standards) and all applicable civil rights laws, regulations, Executive Orders, and policies (see http://www.section508.gov/content/learn for relevant information).

The full nondiscrimination statement provided at the end of this appendix document is rarely, if ever, required for SNAP-Ed. It is necessary to have if SNAP or other FNS program eligibility or application information is provided. For online sites, individual SNAP-Ed webpages should provide the full version of the nondiscrimination statement if there is information that requires the full statement to be featured even if it is on a different webpage of the site. A recommendation is to link to the appropriate version, available at http://www.fns.usda.gov/fns-nondiscrimination-statement, in the footer of the site.

The nondiscrimination statement should be made available in English or other languages appropriate for the local population served or directly affected by any USDA program or activity. Please be sure to use the provided USDA translations, rather than

have the statement translated for you. Translated versions of the nondiscrimination statement will be available in the following languages:

- Amharic
- Arabic
- Armenian
- Chinese (both Traditional and Simplified)
- Haitian Creole
- Farsi
- Vietnamese
- Laotian
- Portuguese (Brazil)
- Serbo-Croatian
- Khmer
- Polish
- Hindi
- Hmong
- Korean
- Russian
- Somali
- Thai
- Urdu

Please refer to http://www.fns.usda.gov/fns-nondiscrimination-statement for more information on translated statements.

SNAP-Ed State and Implementing Agencies are required to notify applicants with disabilities and limited English proficiency (LEP) persons of their right to free language assistance and accommodations and provide free language assistance and accommodations upon request.

SNAP State Agencies must also ensure equal opportunity access for persons with disabilities. This includes ensuring that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications for people without disabilities. Persons with disabilities who require alternative means of communication of program information, including web-based information, must be provided with alternative formats (e.g. Braille, large print, audiotape, American Sign Language, etc.). If materials developed and released by the USDA are needed in alternative formats, please contact the SNAP-Ed National Office by emailing SNAP-Ed@fns.usda.gov with the type of alternative format requested (Braille, large print, etc.), the quantity desired, and a mailing address. Additionally, State Agencies that participate in SNAP must take reasonable steps to ensure that LEP persons have meaningful access to programs, services, and benefits. This includes the requirement to provide bilingual program information and certification materials and interpretation services to single-language minorities in certain project areas.

The nondiscrimination statement is not needed if a document meets the following criteria:

- is not funded by the USDA/SNAP-Ed;
- only contains content that provides general information for the public (examples are menus, calendars, and recipes);

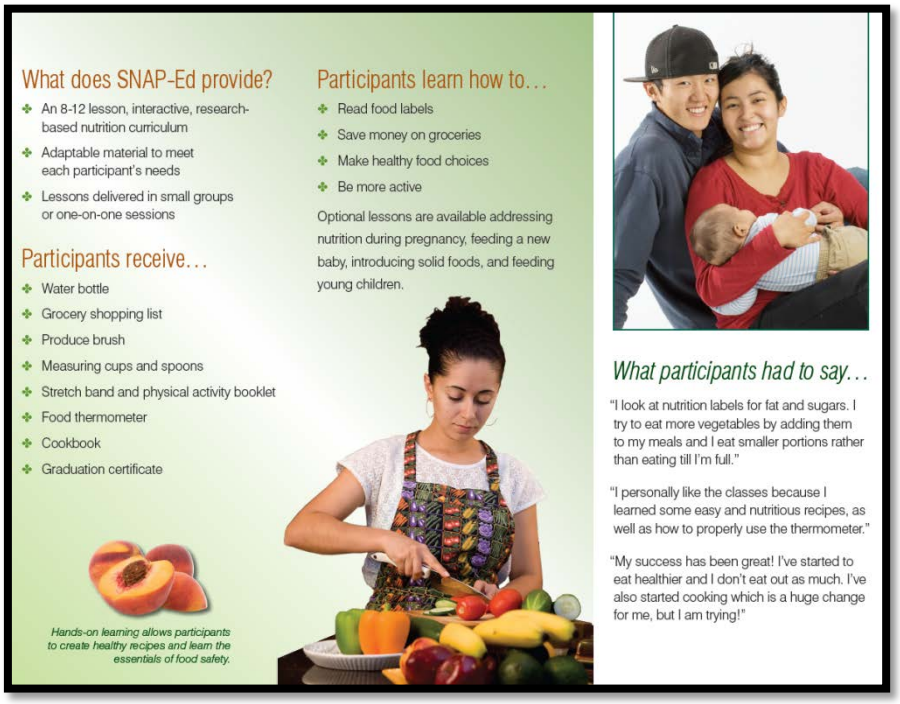
  and

- has no SNAP or SNAP-Ed program information or reference to SNAP application or eligibility.

When in doubt about proper usage of the nondiscrimination statement, refer to your regional SNAP-Ed Coordinator.

Example Documents

Example 1:



What does SNAP-Ed provide?

- An 8-12 lesson, interactive, research-based nutrition curriculum
- Adaptable material to meet each participant's needs
- Lessons delivered in small groups or one-on-one sessions

Participants receive…

- Water bottle
- Grocery shopping list
- Produce brush
- Measuring cups and spoons
- Stretch band and physical activity booklet
- Food thermometer
- Cookbook
- Graduation certificate

Hands-on learning allows participants to create healthy recipes and learn the essentials of food safety.

Participants learn how to…

- Read food labels
- Save money on groceries
- Make healthy food choices
- Be more active

Optional lessons are available addressing nutrition during pregnancy, feeding a new baby, introducing solid foods, and feeding young children.

What participants had to say…

"I look at nutrition labels for fat and sugars. I try to eat more vegetables by adding them to my meals and I eat smaller portions rather than eating till I'm full."

"I personally like the classes because I learned some easy and nutritious recipes, as well as how to properly use the thermometer."

"My success has been great! I've started to eat healthier and I don't eat out as much. I've also started cooking which is a huge change for me, but I am trying!"

Since the handout above includes program information, such as goals and objectives, it would require the short nondiscrimination statement, "This institution is an equal opportunity provider."

Example 2:

Farmer's Market Stir-Fry [1]

Serves: 8
Ingredients:

2 cups cooked brown rice

vegetable oil cooking spray

3 gloves garlic or $^{1}/_{2}$ teaspoon garlic powder

1 teaspoon fresh ginger or $^{1}/_{2}$ teaspoon ground ginger

1 cup onion, diced

1 cup broccoli, cut into bite-sized pieces

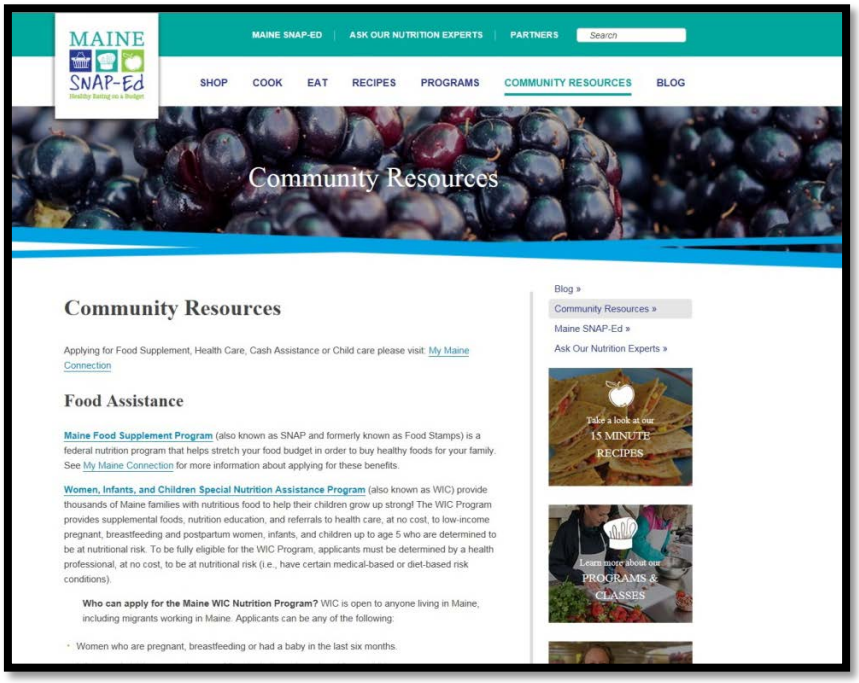
1 cup carrots, sliced

1 cup cabbage, chopped

1 cup cauliflower, cut into bite-sized pieces

The Farmer's Market Stir-Fry recipe does not provide SNAP-Ed program information or use a USDA or MyPlate logo, so no nondiscrimination statement is required.

Example 3:



The web page pictured above includes a link to application forms for SNAP benefits and therefore requires the full nondiscrimination statement from the USDA website at http://www.fns.usda.gov/fns-nondiscrimination-statement. The link to the appropriate statement can be placed in the footer.

Example 4:

The website pictured above does not link to or feature SNAP benefit information or applications, so the short nondiscrimination statement suffices.

Example 5

This participant recruitment flyer would require the short nondiscrimination statement since it includes SNAP-Ed program information, such as locations and contact details. Although the program is not explicitly referred to as a "SNAP-Ed" activity, the short nondiscrimination statement is required because the program provides nutrition education using SNAP-Ed funding.

Full Nondiscrimination Statement

English:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Spanish

Las agencias estatales o locales de SNAP y FDPIR, y sus beneficiarios secundarios, deben publicar el siguiente Aviso de No Discriminación:

De conformidad con la Ley Federal de Derechos Civiles y los reglamentos y políticas de derechos civiles del Departamento de Agricultura de los EE. UU. (USDA, por sus siglas en inglés), se prohíbe que el USDA, sus agencias, oficinas, empleados e instituciones que participan o administran programas del USDA discriminen sobre la base de raza, color, nacionalidad, sexo, credo religioso, discapacidad, edad, creencias políticas, o en represalia o venganza por actividades previas de derechos civiles en algún programa o actividad realizados o financiados por el USDA.

Las personas con discapacidades que necesiten medios alternativos para la comunicación de la información del programa (por ejemplo, sistema Braille, letras grandes, cintas de audio, lenguaje de señas americano, etc.), deben ponerse en contacto con la agencia (estatal o local) en la que solicitaron los beneficios. Las personas sordas, con dificultades de audición o con discapacidades del habla pueden comunicarse con el USDA por medio del Federal Relay Service [Servicio Federal de

Retransmisión] llamando al (800) 877-8339. Además, la información del programa se puede proporcionar en otros idiomas.

Para presentar una denuncia de discriminación, complete el Formulario de Denuncia de Discriminación del Programa del USDA, (AD-3027) que está disponible en línea en: http://www.ocio.usda.gov/sites/default/files/docs/2012/Spanish_Form_508_Compliant_6_8_12_0.pdf, y en cualquier oficina del USDA, o bien escriba una carta dirigida al USDA e incluya en la carta toda la información solicitada en el formulario. Para solicitar una copia del formulario de denuncia, llame al (866) 632-9992. Haga llegar su formulario lleno o carta al USDA por:

(1) correo: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; o

(3) correo electrónico: program.intake@usda.gov.

Esta institución es un proveedor que ofrece igualdad de oportunidades.

Edits and size requirements
Additions, edits, or deletions to the Civil Rights statement are not allowed. The minimum font size for nondiscrimination statements for brochures is 8 point. For all other printed materials and web pages, the statement must be legible. Use of a smaller font size must be approved by FNS CRD in writing.

Credit

Should be provided to SNAP as a funding source on newly developed and reprinted materials. FNS recommends 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).”

About Team Nutrition Materials

Team Nutrition is an initiative of the US. Department of Agriculture’s Food and Nutrition Service that supports the Child Nutrition Programs through training and technical

assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity. The goal of Team Nutrition is to improve children's lifelong eating and physical activity habits through nutrition education based on the principles of the Dietary Guidelines for Americans and MyPlate. SNAP-Ed and Team Nutrition materials may be used to deliver direct nutrition education and physical activity through Approach One.

Under the Team Nutrition initiative, FNS provide numerous high-quality free educational materials for schools and child care. Materials developed under the Team Nutrition initiative utilize six communication channels:

1. food service
2. classroom
3. school
4. home
5. community
6. media

These channels offer a comprehensive network for delivering consistent and reinforcing nutrition messages to children and their caretakers. Social cognitive theory provides the theoretical framework for Team Nutrition, as this addresses personal, behavioral, and environmental factors that influence behavior.

Articles about the Team Nutrition approach include:

- The Story of Team Nutrition http://www.fns.usda.gov/story-team-nutrition-executive-summary-pilot-study; and
- The Team Nutrition Pilot Study: Lessons Learned From Implementing a Comprehensive School-based Intervention http://www.ncbi.nlm.nih.gov/pubmed/12047818.

The development process for Team Nutrition materials includes the following:

- Review of peer-reviewed nutrition education literature
- Application of Social Cognitive Theory and development of behaviorally focused objectives
- Formative research with the target audience to test concepts, nutrition education messages, and images
- Alignment with educational standards, such as math, science, English, and health
- Formative research of draft materials with the target audience (e.g., piloting of materials in classrooms, focus group testing of parent materials, teacher interviews, etc.)
- Review by Child Nutrition experts and stakeholders

- Review by U.S. Department of Agriculture and the Department of Health and Human Services via a Dietary Guidelines Work Group for consistency with the Dietary Guidelines for American and technical accuracy

Eat Smart Live Strong was evaluated as part of the SNAP Education and Evaluation Study, Wave II (see http://www.fns.usda.gov/sites/default/files/SNAPEdWaveII.pdf). My Plate for My Family is an update of the Loving Your Family, Feeding their Future nutrition education kit and is considered practice-based. States are encouraged to conduct evaluations of this resource if implemented as part of their nutrition education and obesity prevention interventions.

Examples of Team Nutrition materials (http://teamnutrition.usda.gov/) include:

- Discover MyPlate: Nutrition Education for Kindergarten
- Serving Up MyPlate: A Yummy Curriculum (Grades 1-6)
- The Great Garden Detective Adventure (Grades 3-4)
- Dig In! Nutrition Education from the Ground Up (Grades 5-6)
- Healthier Middle Schools: Everyone Can Help

Start Simple with MyPlate

New: The USDA Center for Nutrition Policy and Promotion (CNPP) recently developed a new campaign, Start Simple with MyPlate, to promote healthy eating and physical activity.

- *START SIMPLE WITH MYPLATE* (https://www.choosemyplate.gov/start-simple-myplate) provides tips from the five MyPlate food groups (Fruits, Vegetables, Grains, Protein Foods, Dairy) that Americans can easily incorporate into their busy lives
- The ideas fit a variety of food preferences, health goals, and budgets
- The goal is to help consumers with daily food choices, increase awareness of the MyPlate food groups, and provide ways to meet food group targets

Food and Drug Administration (FDA) Nutrition Label Educational Materials

FDA's Center for Food Safety and Applied Nutrition (CFSAN) has a wealth of educational materials that make it easy to understand and use the Nutrition Facts label, Menu Labeling, and other nutrition and food safety topics. Consumers, educators, teachers, dietitians, and health professionals are invited to check out CFSAN's many online resources, and downloadable and printable materials in the CFSAN Education Resource Library (https://epublication.fda.gov/epub/) and on CFSAN's Nutrition Education Page (https://www.fda.gov/nutritioneducation). **End of new material.**

Appendix E: 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.).

Budget Projection: FNS-366A is a budget report submitted by State agencies to FNS to request the amount of annual funds needed to operate SNAP. It is the form used to support the annual funding request. Any need for additional funds require a revised 366A.

Capital Equipment is non-expendable property having a value of $5000 or more per item at the time of acquisition. Capital equipment shall (7CFR 277 (OMB Circular A-87)) be inventoried and accounted for every 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.

Child Nutrition Programs include the National School Lunch Program, the School Breakfast Program, the Child and Adult Care Food Program, the Fresh Fruit and Vegetable Program, the Summer Food Service Program, the Special Milk Program, and the Seamless Summer and the Afternoon Snacks Program.

Cognizant Federal Agency refers to the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item *APPENDIX E, INDIRECT COSTS*.

Organization	Cognizant Federal Agency
State Public Assistance Agencies	Dept. of Health and Human Services (DHHS)
All Other State agencies	Federal agency identified by OMB
Educational Institution	Department of Education, Department of Defense-Naval Research or DHHS, depending on which provided more Federal funds over the last 3 years
Nonprofit Organization	Normally the Federal agency with the largest dollar value of award with the organization

Collective Impact is the commitment by a group of actors from different sectors to a common agenda to solve complex social problems such as healthy eating or obesity prevention. Collective impact requires five conditions for success: a common agenda, shared measurement, mutually reinforcing activities based on a common action plan, continuous communication, and backbone support to guide the group's actions, provide technical support, and mobilize resources.

Corrective Action or Required Corrective Action: actions proposed or taken by an operating organization (State or implementing agency) to respond to a finding of noncompliance with Federal regulations, Agency Instructions, and Policy Memos.

Data Mining: the search for relationships and global patterns that exist in large databases, but are `hidden' among the vast amounts of data.

Desk Review: activity performed by FNS staff while not on-site – examples include review of printed files, electronic media, etc. Desk reviews are completed like an on-site review except that staff does not travel to the location whose operations are under review.

Education and Administrative Reporting System (EARS): 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.

EFNEP is the **Expanded Food and Nutrition Education Program** of the National Institute of Food and Agriculture. EFNEP is a Federal Extension (community outreach) program that operates through the 1862 and 1890 Land-Grant Universities. EFNEP uses paraprofessionals to deliver evidence-based, hands on, interactive lessons to participants.

Emerging Strategies or Interventions are community- or practitioner-driven activities that have the potential for obesity prevention, but have not yet been formally evaluated for obesity prevention outcomes. Emerging strategies or interventions in SNAP-Ed require a justification for a novel approach and must be evaluated for effectiveness.

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 *2015-2020 Dietary Guidelines for Americans* (see http://health.gov/dietaryguidelines/2015/guidelines/). SNAP-Ed services may also include emerging strategies or interventions, which are community- or practitioner-driven activities that have the potential for obesity prevention, but have not yet been formally evaluated for obesity prevention outcomes. Emerging strategies or interventions require a justification for a novel approach and must be evaluated for effectiveness. 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 the effects of policy, systems, and environmental changes in accordance with SNAP-Ed Guidance.

Finding: identification of non-compliance with program regulations, FNS Instructions and Policy Memos. Each finding is associated with a required corrective action.

Fiscal Year is the Federal Fiscal Year that runs from October 1 of one year through September 30 of the following year.

Functional Areas: program activities performed by the State agency that are examined and measured in an ME.

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/Food Shelf: 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.

Food Distribution Program on Indian Reservations (FDPIR) provides USDA foods, formerly known as commodity foods, to low-income households, including the elderly, living on Indian reservations, and to Native American families residing in designated areas near reservations and in the State of Oklahoma.

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.

GIS is **Geographic Information System Mapping** and refers to a system for storing, editing, and displaying geographical information on a computer.

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.

Implementing Agencies contract with State agencies to provide SNAP-Ed and include Cooperative Extension offices, universities, State departments of health or education, State level nutrition networks, food banks, and other organizations.

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. Check with Budget on this definition for clarity.

Interventions are a specific set of evidence-based, behaviorally–focused activities and/or actions to promote healthy eating and active lifestyles.

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.

Management Evaluation (ME): periodic assessment of the accomplishment of program objectives and compliance assessment of State agency and local program operations including compliance efficiency, effectiveness and quality of service that results in a report that indicates ME findings, observations, and noteworthy initiatives.

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.

Means-tested programs are those that require the income and/or assets of an individual or family to fall below specified thresholds in order to qualify for benefits. There may be additional eligibility requirements to receive these programs, which provide cash and noncash assistance to eligible individuals and families. For SNAP-Ed the threshold is at or below 185 percent of the Federal Poverty Level.

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.

Multi-level interventions reach the target audience at more than one level of the SEM and mutually reinforce each other. Multi-level interventions generally are thought of as having three or more levels of influence.

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.

Noteworthy Initiatives: projects and practices worthy of recognition that can be shared with other state agencies for replication and in an effort to improve program operations.

Observation: identification of a program weakness or area needing improvement which may involve management practices or an unregulated activity. This is associated with a suggestion.

On-Site: FNS activity performed at a State agency's office, local office, or program operating site/location, for example any activity not performed in FNS offices. This may include local agency visits, store visits, interviewing staff, review of computer systems, participant files, reports, forms, and records.

Open Finding: A finding in which the corrective action has not been implemented by the SA and/or validated by FNS.

Outreach: providing information or assistance to individuals who might be eligible for SNAP (https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-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. Outreach is not an allowable SNAP-Ed expense.

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. https://aspe.hhs.gov/poverty-research.

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. https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html

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

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 health approach as defined by CDC is a four-step process that is rooted in the scientific method. It can be applied to violence and other health problems that affect populations. The public health approach steps are: define and monitor the problem; identify risk and protective factors; develop and test prevention strategies; and assure widespread adoption. These efforts affect a large segment of the population rather than targeting the individual or small group. Learn more about the public health approach here: http://www.cdc.gov/violenceprevention/pdf/ph_app_violence-a.pdf .

Public health interventions are community-focused, population-based interventions aimed at preventing a disease or condition, or limiting death or disability from a disease or condition, according to the CDC.

Public Housing, defined by the U.S. Department of Housing and Urban Development, public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single family houses to high-rise apartments for elderly families. There are approximately 1.2 million households living in public housing unites managed by some 3,300 housing authorities. https://www.hud.gov/topics/rental_assistance/phprog

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.

RE-AIM is a framework designed to enhance the quality, speed, and public health impact of efforts to translate research into practice in five steps:

- **Reach** your intended target population
- **Efficacy** or effectiveness
- **Adoption** by target staff, settings, or institutions
- **Implementation** consistency, costs and adaptations made during delivery
- **Maintenance** of intervention effects in individuals and settings over time

To learn more about RE-AIM and how it can be used to evaluate SNAP-Ed programs, please visit: https://snapedtoolkit.org/training/online-training/

Repeat Finding: A finding that is identical to a previously cited, closed finding that is discovered at the same SA in at least one of the reviews conducted within the continuous six-year period immediately preceding the ME.

Required Corrective Action: statement of actions needed to correct non-compliance with regulations and established policies and procedures. These actions may be prescribed or the State agency may be required to determine the action(s) to be taken to correct a finding.

Review Coordinator: FNS employee who is designated as the primary contact or lead team official for a particular ME.

Review Cycle: recurring time interval, measured in years, during which all agencies within a program are to be reviewed across functional areas. FNS SNAP-Ed MEs are conducted on at “at-risk” basis. All State agencies must be reviewed at a minimum based on the review cycles listed in the annual target memo; FNSRO staff should review State agency risk criteria annually to decide which MEs will be conducted.

Single Audit: an audit of a State agency’s financial statements and Federal funds received performed by a State agency audit entity or State agency contractor and conducted in accordance with the requirements of 2 CFR 200 Subpart F “Audits Requirements”.

SNAP-Ed eligible individuals is a label that refers to the target audience for SNAP-Ed, specifically SNAP participants and other low-income individuals who qualify to receive SNAP benefits or other means-tested Federal assistance programs, such as Medicaid or Temporary Assistance for Needy Families. It also includes individuals residing in communities with a significant low-income population.

SNAP Nutrition Education and Obesity Prevention Services are a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, demonstrated to facilitate 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 receive benefits under SNAP or other means-tested Federal assistance programs, and individuals residing in communities

with a significant low-income population. Nutrition education and obesity prevention services are delivered through multiple venues, often through partnerships, and involve activities at the individual, interpersonal, community, and societal levels. Acceptable policy level interventions are activities that encourage healthier choices based on the current *DIETARY GUIDELINES FOR AMERICANS* (DGA). Intervention strategies may focus on increasing consumption of certain foods, beverages, or nutrients as well as limiting consumption of certain foods, beverages, or nutrients consistent with the DGA.

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 includes SNAP participants, low-income individuals eligible to receive benefits under SNAP or other means-tested Federal assistance programs, and individuals residing in communities with a significant (50 percent or greater) low-income population.

SNAP-Ed Toolkit is an obesity prevention toolkit of evidence-based policy, systems, and environmental change (PSE) strategies & interventions that are appropriate for the SNAP-Ed population. The Toolkit was developed by FNS in collaboration with NCCOR and CenterTRT and lists strategies and interventions for child care, school, community, and family settings and how to evaluate them.

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, as described by CDC is "the application of commercial marketing technologies to the analysis, planning, execution, and evaluation of programs designed to influence voluntary behavior of target audiences in order to improve their personal welfare and that of society."

Soup Kitchen: 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.

State SNAP-Ed Plan: an official written document that describes SNAP-Ed services to be provided. It should clearly describe goals, objectives, priorities, specific activities/interventions, resources needed including staffing and budget information as well as evaluation methods.

Strategies: broad approaches to intervening on nutrition education and obesity prevention target areas.

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 subgrantee 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.

Suggestion: statement of actions that address observations made in the ME. These actions may or may not be required. Each suggestion is associated with an observation.

Supplemental Nutrition Assistance Program (SNAP) Eligibles: SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance.

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

Team Nutrition is an initiative of the Food and Nutrition Service to support the Child Nutrition Programs through training and technical assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity.

Technical Assistance: guidance and support to State agencies to achieve regulatory compliance and program improvement.

Unduplicated Count: EARS requires an unduplicated count of persons to be recorded per intervention, meaning that a person is counted once, regardless of the number of sessions within a series in which they participated. A participant should be counted once for each different intervention they attend. Please use these guidelines when reporting social marketing and/or PSE change activities.

Work Papers: all papers, notes and documents prepared in completing an ME; includes all individual worksheets.

Appendix F. Acronyms

APD - Advance Planning Document

CFR - Code of Federal Regulations

CACFP - Child and Adult Care Food Program

CFR - Code of Federal Regulations

CDC - Centers for Disease Control and Prevention

CenterTRT – Center for Training and Research Translation

CNP - Child Nutrition Programs

CNPP - Center for Nutrition Policy and Promotion

DNPAO – Division of Nutrition, Physical Activity, and Obesity

EARS - Education and Administrative Reporting System

EFNEP - Expanded Food and Nutrition Education Program

FDPIR - Food Distribution Program on Indian Reservations

FFY - Federal Fiscal Year

FM - Financial Management

FNS - Food and Nutrition Service

FNSRO - Food and Nutrition Service Regional Office

FPRS - Food Program Reporting System

FY - Fiscal Year

HHS - U.S. Department of Health and Human Services

IA - Implementing Agency

ITO - Indian Tribal Organization

ME - Management Evaluation

MOU - Memorandum of Understanding

NAL - National Agricultural Library

NCCOR - National Collaborative on Childhood Obesity Research

NEOP – Nutrition education and obesity prevention

NIFA - National Institute of Food and Agriculture

OMB - Office of Management and Budget

PAG - Physical Activity Guidelines

PDF - Portable Document Format

PHA - Public health approaches

PSA - Public Service Announcement

PSE - Policy, systems, and environment

SA - State Agency

SEM - Social-Ecological Model

SNAP - Supplemental Nutrition Assistance Program

SNAP-Ed - Supplemental Nutrition Assistance Program Education

TA - Technical Assistance

TANF - Temporary Assistance for Needy Families

WIC - Special Supplemental Nutrition Program for Women, Infants and Children

USDA - Department of Agriculture

Appendix G. SNAP-Ed Management Evaluation Guide

SNAP-ED Management Evaluation Guide for State Agencies

This checklist is used to review SNAP-Ed Programs during Management Evaluations of a State agency (SA) and may be helpful to States during the Plan development process.

Citations	Questions for Determining Compliance	Yes	No
Per SNAP-Ed Guidance	Has the State agency (SA) identified clear population health-related nutrition and physical activity goals for its SNAP-Ed target population such as percent reductions in childhood obesity rates, and in prevalence of diet-related diseases such as diabetes?		
§272.1(c)(i)	Has disclosure of information obtained from SNAP applicant households been restricted to persons directly connected with the administration or enforcement of the Food Stamp Act or regulations? • Do any data sharing agreements specify the data to be exchanged, the procedures used to exchange the data, how the data will be stored and who will have access, steps to be taken in case of a data breach, and how data will be securely destroyed? • Is participant information protected through the use of encrypted servers?		
§272.2(d)(2)(ii)	Does the SA notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities?		
§272.2(d)(2)(iii)	Does the SA describe methods used to identify its target audience that follow approved targeting strategies and supporting data sources included in the SNAP-Ed Plan Guidance and alternate targeting strategies approved by FNS?		

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(iv)	Does the SA have a valid, data-driven needs assessment on the nutrition, physical activity, and obesity prevention needs of the target population and the barriers to accessing healthy foods and physical activity? Does the needs assessment consider the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, and transportation/mobility needs?		
§272.2(d)(2)(v)	Does the SA ensure that interventions are appropriate for low-income individuals eligible to receive SNAP benefits? Do interventions recognize the population's constrained resources and potential eligibility for Federal food assistance?		
§272.2(d)(2)(vi)	Does the SA provide evidence-based nutrition education and obesity prevention services either directly or through agreements with IAs and community organizations?		
§272.2(d)(2)(vii)(A)	Does the SA use the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan? Does the SA provide oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts? • Are costs allowable, necessary, and reasonable? • Are costs in accordance with 2 CFR 200 Subpart E "Cost Principles"		

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(vii)(B)	Does the SA's SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports?		
§272.2(d)(2)(vii)(B)	Are the activities designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors?		
§272.2(d)(2)(vii)(B)	Are the nutrition education and obesity prevention services delivered through multiple venues?		
§272.2(d)(2)(vii)(B)	Are activities delivered at the individual, community, and appropriate policy levels? Note, acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans		
§272.2(d)(2)(vii)(B)	Are all strategies and interventions evidence-based?		
§272.2(d)(2)(vii)(B)	Are there research-based strategies and interventions that reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence?		
§272.2(d)(2)(vii)(B)	Are there practice-based strategies and interventions that reflect case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential? Is the state providing sufficient justification for the use of emerging strategies and evaluating all emerging strategies for effectiveness?		
§272.2(d)(2)(vii)(C)	Do the SA's SNAP-Ed activities promote healthy food and physical activity choices based on the most recent Dietary Guidelines for Americans and Physical Activity Guidelines?		
Per SNAP-Ed Guidance	Has the State agency (SA) identified clear population health-related nutrition and physical activity goals for its SNAP-Ed target population such as percent reductions in childhood obesity rates, and in prevalence of diet-related diseases such as diabetes?		

Citations	Questions for Determining Compliance	Yes	No
§272.1(c)(1)	Has disclosure of information obtained from SNAP applicant households been restricted to persons directly connected with the administration or enforcement of the Food Stamp Act or regulations? • Do any data sharing agreements specify the data to be exchanged, the procedures used to exchange the data, how the data will be stored and who will have access, steps to be taken in case of a data breach, and how data will be securely destroyed? • Is participant information protected through the use of encrypted servers?		
§272.2(d)(2)(ii)	Does the SA notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities?		
§272.2(d)(2)(iii)	Does the SA describe methods used to identify its target audience that follow approved targeting strategies and supporting data sources included in the SNAP-Ed Plan Guidance and alternate targeting strategies approved by FNS?		
§272.2(d)(2)(iv)	Does the SA have a valid, data-driven needs assessment on the nutrition, physical activity, and obesity prevention needs of the target population and the barriers to accessing healthy foods and physical activity? Does the needs assessment consider the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, and transportation/mobility needs?		
§272.2(d)(2)(v)	Does the SA ensure that interventions are appropriate for low-income individuals eligible to receive SNAP benefits? Do interventions recognize the population's constrained resources and potential eligibility for Federal food assistance?		

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(vi)	Does the SA provide evidence-based nutrition education and obesity prevention services either directly or through agreements with IAs and community organizations?		
§272.2(d)(2)(vii)(A)	Does the SA use the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan? Does the SA provide oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts? • Are costs allowable, necessary, and reasonable? • Are costs in accordance with 2 CFR 200 Subpart E “Cost Principles"		
§272.2(d)(2)(vii)(B)	Does the SA’s SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports?		
§272.2(d)(2)(vii)(B)	Are the activities designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors?		
§272.2(d)(2)(vii)(B)	Are the nutrition education and obesity prevention services delivered through multiple venues?		
§272.2(d)(2)(vii)(B)	Are activities delivered at the individual, community, and appropriate policy levels? Note, acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans		
§272.2(d)(2)(vii)(B)	Are all strategies and interventions evidence-based?		
§272.2(d)(2)(vii)(B)	Are there research-based strategies and interventions that reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence?		

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(vii)(B)	Are there practice-based strategies and interventions that reflect case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential? Is the state providing sufficient justification for the use of emerging strategies and evaluating all emerging strategies for effectiveness?		
§272.2(d)(2)(vii)(C)	Do the SA's SNAP-Ed activities promote healthy food and physical activity choices based on the most recent Dietary Guidelines for Americans and Physical Activity Guidelines?		

Civil Rights

Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	Does the SA provide annual civil rights training for all SNAP-Ed agencies? • Civil Rights training is current and accurate? • Civil Rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance?		
FNS Instruction 113-1	Is annual civil rights training provided for all front-line personnel? • Civil Rights training is current and accurate? • Civil Rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance? Civil Rights training includes the nine mandatory topics (Collection and use of data; effective public notification systems; complain procedures; compliance review techniques; resolution of non-compliance; requirements for reasonable accommodation for persons with disabilities; requirements for language assistance; conflict resolution; and customer service)?		
FNS Instruction 113-1	Does the SA monitor IA civil rights compliance as part of SNAP-Ed reviews? • Civil Rights review questions or prompts are included on SA standard review forms?		
FNS Instruction 113-1	• Nutrition education and related services/benefits are provided free from discrimination? • Materials developed and used are appropriate for audience • The education provided and materials used are culturally appropriate • In-person education is provided at accessible locations (convenient to public transportation, free parking, etc.) and on days/times that are convenient for audience participation • Bilingual staff are provided as needed; minimally, the presenter/educator has a way to communicate with all participants		

Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	Materials contain the required USDA non-discrimination statement in accordance with SNAP-Ed Guidance. If other statements are also used, they are listed separately, and the USDA statement is listed first?		
FNS Instruction 113-1	Nondiscrimination (“And Justice for All”) posters are posted whenever and wherever SNAP-Ed services/education/interventions are provided?		

SNAP-ED Management Evaluation Guide for Implementing Agencies

This checklist is used to review SNAP-Ed implementing agency programming during Management Evaluations. This may be helpful to States and implementing agencies during planning, or for State agencies during their monitoring of implementing agency programming.

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(ii)	Does the Implementing Agency (IA) notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities?		
§272.2(d)(2)(iii)	Does the IA describe methods used to identify its target audience that follow approved targeting strategies?		
§272.2(d)(2)(iv)	Does the IA use the State's valid and data-driven needs assessment on the nutrition, physical activity, and obesity prevention meet the needs of the target population and the barriers to accessing healthy foods and physical activity? Does the needs assessment consider the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, and transportation/mobility needs?		
§272.2(d)(2)(v)	Does the IA ensure that interventions are appropriate for low-income individuals eligible to receive SNAP benefits? Does the intervention recognize the population constrained resources and potential eligibility for Federal food assistance?		
§272.2(d)(2)(vi)	Does the IA provide evidence-based nutrition education and obesity prevention services and does the IA deliver services either directly or through agreements with other local IA and community organizations?		

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(vii)(A)	Does the IA use the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan? Does the SA provide oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts? Are costs allowable, necessary, and reasonable?		
§272.2(d)(2)(vii)(B)	Does the IA's SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports?		
§272.2(d)(2)(vii)(B)	Are the activities designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors?		
§272.2(d)(2)(vii)(B)	Are the nutrition education and obesity prevention services delivered through multiple venues?		
§272.2(d)(2)(vii)(B)	Are activities delivered at the individual, community, and appropriate policy levels? *Note, acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans*		
§272.2(d)(2)(vii)(B)	Are all strategies and interventions evidence-based?		
§272.2(d)(2)(vii)(B)	Are there research-based strategies and interventions that reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence?		

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(ix)	Does the IA include an operating budget for the Federal fiscal year with an estimate of the cost of operation to the State's approved SNAP-Ed Plan?		
§272.2(d)(2)(xi)	Does the IA meet FNS fiscal recordkeeping and reporting requirements, including: • All SNAP-Ed expenditures are reported on the Financial Status Report SF-425 SA collects and reports State and private contributions to the SNAP-Ed activities through the EARS via FNS-759		
§272.2(d)(2)(xii)	Does the IA seek additional information regarding the type of nutrition education and obesity prevention activities offered and the characteristics of the target population served to determine whether nutrition education goals are being met? Does the IA periodically evaluate whether or not its meeting nutrition education goals?		

Civil Rights

Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	IA provides annual civil rights training for all front-line personnel? • Civil Rights training is current and accurate? • Civil Rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance? Civil Rights training includes the nine mandatory topics (Collection and use of data; effective public notification systems; complain procedures; compliance review techniques; resolution of non-compliance; requirements for reasonable accommodation for persons with disabilities; requirements for language assistance; conflict resolution; and customer service)?		
FNS Instruction 113-1	Nutrition education and related services/benefits are provided free from discrimination? • Materials developed and used are appropriate for audience • The education provided and materials used are culturally appropriate • In-person education is provided at accessible locations (convenient to public transportation, free parking, etc.) and on days/times that are convenient for audience participation • Bilingual staff are provided as needed; minimally, the presenter/educator has a way to communicate with all participants		
FNS Instruction 113-1	Materials contain the required USDA non-discrimination statement in accordance with the SNAP-Ed Guidance. If other statements are also used, they are listed separately, and the USDA statement is listed first?		
FNS Instruction 113-1	Nondiscrimination (“And Justice for All”) posters are posted whenever and wherever SNAP-Ed services/education/interventions are provided?		