Food Stamp Nutrition Education Plan Guidance

Federal Fiscal Year 2005

United States Department of Agriculture
Food and Nutrition Service
Food Stamp Program
March 2004

USDA

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive

Alexandria, VA 22302-1500

MAR - 5 2004

Dear State Cooperators:

I am pleased to present to you the State Food Stamp Program Nutrition Education Plan Guidance for Fiscal Year (FY) 2005. Any modifications are designed to help States develop a clear and comprehensive Food Stamp Nutrition Education (FSNE) plan and to facilitate the review and approval process.

The State agency must provide oversight of all FSNE activities and is accountable for the content of their nutrition education plan and the financial integrity of their activities. Our regional FNS offices are available to provide technical assistance to State agencies regarding the State plan process. The State agency is, in turn, responsible for ensuring that any sub-grantees follow this guidance and implement approved activities accordingly.

This 2005 Guidance includes updated templates and information for States on how to ensure an expeditious review process. I encourage States to review this guidance and utilize the suggested templates. States must submit one integrated plan for the State on or before the August 15 deadline. Multiple State plans (from various State sub-grantees) will not be accepted. This year, we are requesting both an electronic copy and a paper copy of the plan. States are not guaranteed reimbursement of funds for FSNE activities until they have received approval from FNS for activities described in the State's FY 2005 plan. This approval is always contingent on the availability of federal funds.

The success of FSNE depends on our ability to reach our target audience, Food Stamp Program participants and applicants, with science-based and behaviorally focused interventions and messages. Specific changes in the 2005 Guidance that are designed to facilitate this effort are listed on the attached *2005 Guidance Change Highlights*. The 2005 Guidance, with marked changes from 2004, will available online by March 10, 2004 at: http://www.nal.usda.gov/foodstamp/National_FSNE.html.

Currently, FNS is developing a FSNE policy framework that will delineate guiding principles, specify the national goal and behavioral outcomes, and identify the roles and responsibilities of federal, state and local levels in nutrition education. This framework will be available for public comment prior to its release. Other ongoing initiatives include a FSNE administrative reporting system and a national descriptive study of FSNE. We anticipate that these initiatives will have contributions to the Guidance in 2006 and 2007. Throughout the year, please feel free to provide comments on the 2005 guidance to us through your FNS regional contacts. We are happy to consider your views and welcome suggestions for improvement.

Sincerely,

Barbara Hallman

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Acting Director
Program Accountability Division, Food Stamp Program

2005 Guidance Change Highlights

- **Food Stamp Nutrition Education (FSNE) Plan Introduction (page 9).** Clarifies that this guidance provides information on FSNE in conjunction with OMB Circulars, Food Stamp Program (FSP) regulations and policy memorandums.
- **Nutrition Education Plan Submission and Approval Process (pages 9-10).** Requests that States submit both a paper and an electronic (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM) copy of their plan and report to the FNS Regional Office.
- **Plan Approval (pages 10-11).** Specifies FNS recommendations on plan and report format, organization and submission in order to facilitate the plan review process and prevent delayed approvals or denials due to incomplete or poorly organized plans.
- **Multiple Year Plans.** Eliminates multiple year plans because of the major revisions to FSNE that are anticipated for 2006.
- **Management and Evaluation Review (page 11).** Details events that may lead FNS to conduct an onsite review of State FSNE activities.
- **Coordination and Collaboration (pages 12, 19, 36).** Elaborates on the importance of collaborating with other FNS programs in the State on FSNE activities and messages.
- **Final Report Summary (pages 14, 25-27).** Adds a State Final Report Summary template for reporting on your State's FSNE projects and social marketing campaigns.
- **Nutrition Intervention Description Form and Outcome Data**. Eliminates the request for certain reporting information, including the Nutrition Intervention Description Form and other outcome data, in order to permit the development of an FNS national FSNE reporting system and minimize States' reporting burden.
- **Contacts Reporting (pages 15, 28-29).** Adds data reporting for the number of FSNE contacts with FSP participants or households when available.
- **Exclusivity Waivers (pages 16-17, 21-22, 38, 42, 51-52).** Emphasizes that exclusivity waivers will only be granted for certain projects that *inadvertently* reach non-FSP participants/applicants because it is not practical to separate out FSP participants from a group of low-income persons and/or it is impossible to ascertain FSP participation. FNS will only grant waiver requests that are supported by sound justification and documentation. Waivers should be considered the exception, not the rule.
- **Needs Assessment (pages 16, 30-32).** Gives additional guidance on allowable methods for assessing the needs of your State's Food Stamp population. Also provides plan reporting requirements for how this information has helped you identify and target FSP participants and applicants in your State.
- **Goals and Objectives (page 17).** Defines and provides examples of measurable objectives. Emphasizes that project level objectives should support State FSNE goals.
- **Use of Existing Educational Materials (pages 18, 48).** Recommends that that States use existing FNS materials (such as Team Nutrition, Loving Support, and Eat Smart. Play

Hard™) instead of purchasing or reprinting other materials that target the same audience.

- **School Activities (pages 19, 36).** Clarifies the necessity of documented collaboration of FSNE school programs with the State Department of Education and local school administration.
- **Credit and Outreach Statement (pages 20-21).** Adds Spanish translations of the FSP outreach and credit statements.
- **USDA's Rights to Materials (pages 20, 62-63).** Provides further explanation regarding the development of educational materials and USDA's royalty-free rights to these materials.
- **Staffing (pages 21, 37).** Requests additional description of staff duties pertaining to program administration and direct program delivery.
- **Travel (pages 22, 40, 61).** Requests additional justification and budget details pertaining to travel expenses.
- **Time and Effort (pages 45, 55-56).** Updates time and effort documentation requirements to reflect the July 25, 2003 FNS policy memorandum and provides an optional template.
- **In-kind Donations Not Involving Transfers of Cash (page 53).** Gives guidance pertaining to in-kind charges and emphasizes the need for legally enforceable contracts or agreements between the grantee and any sub-grantees.
- **Reinforcement Items (pages 56-59, 65, 67).** Increases the maximum cost per unit for incentives and reinforcement items from $3.00 to $4.00 per unit for inflation and to reflect the policy for all FNS programs.
- **Breastfeeding Activities (page 60).** Clarifies the necessity of documented collaboration of FSNE breastfeeding promotion activities and projects with WIC. Specifies that WIC and the WIC State Breastfeeding Coordinator must play a leading and active role in the planning and development of these activities.
- **Program Income (page 63).** Provides clarification on the disposition of State's income from the sale of FNS-funded materials.
- **Examples of Unallowable Costs (pages 65-67).** Provides additional examples of unallowable costs including costs for: food purchased as groceries or supplemental food; clinical health screenings; nutrition education provided to incarcerated or institutionalized persons that are not eligible for the FSP; and activities where the primary objective is to conduct outreach efforts for the FSP.
- **2005 Timeline (page 78).** Provides a timeline for FY 2005 planning and reporting.

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Food and Nutrition Service Nutrition Education

The U.S. Department of Agriculture, Food and Nutrition Service (FNS) is committed to improving the nutrition and health of low-income Americans and to assisting in meeting the Healthy People 2010 nutrition and related objectives for the nation (www.healthypeople.gov/). The FNS vision statement emphasizes this commitment: To lead America in ending hunger and improving nutrition and health.

The FNS mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

FNS administers 15 nutrition assistance programs that touch the lives of one in five Americans each year, with the potential to make an important difference in the lives of children and low-income populations by promoting food security, reducing hunger, and improving nutritional status. Please check the FNS web site (www.fns.usda.gov/fns/) for more information on these programs. In conjunction with State and local partnerships, FNS programs also hold great potential to influence food choices and to support healthy eating and related nutrition behaviors.

Effectiveness of nutrition education can be greatly enhanced through collaboration and coordination with all FNS programs and others interested in promoting health and nutrition in low-income populations. Consider capitalizing on the services of community groups, including faith-based organizations, and existing service coalitions at the community level. They can assist in referrals to nutrition education, in providing transportation or in offering facilities for nutrition education sessions to the low income people they reach on a regular basis.

Collaboration and coordination can result in delivery of more uniform messages targeting key community nutrition issues. FNS strongly encourages working together to plan, develop and implement more comprehensive, family-centered nutrition education interventions that reach multiple members of the household through a variety of program channels.

Food Stamp Nutrition Education (FSNE)

Goal

The goal of Food Stamp Nutrition Education (FSNE) is to improve the likelihood that Food Stamp Program (FSP) participants and applicants will make healthy food choices within a limited budget and choose active lifestyles consistent with the current Dietary Guidelines for Americans and the Food Guide Pyramid.

FSNE is intended to:

- Assist food stamp households to adopt healthy eating and active lifestyles that are consistent with the Dietary Guidelines for Americans and the Food Guide Pyramid. (Dietary Quality)
- Enhance practices related to thrifty shopping and preparation of nutritious foods by food stamp households. (Shopping Behavior/Food Resource Management)
- Insure that food stamp households have enough to eat without resorting to emergency food assistance and making sure people eligible for the FSP but not participating are made aware of its benefits and how to apply for them as part of nutrition education activity. (Food Security)
- Improve food stamp households' safe handling, preparation and storage of food. (Food Safety)

These four "core elements" form the basic range of educational categories in FSNE.

State Food Stamp Nutrition Education Plan

Introduction

This document provides guidance to State agencies regarding Fiscal Year (FY) 2005 FSP State nutrition education plans. Specifically, it:

- assists with the preparation of the State nutrition education plan;
- provides templates for complete and efficient plan submission (Appendix A);
- describes reporting requirements for activities covered by the plan (Appendix B);
- serves as a reference for policy regarding allowable costs and other policy issues (appendix C);
- provides definitions of key terminology (Appendix D) and abbreviations (Appendix E);
- encourages use of the "Food Stamp Nutrition Connection", a U.S. Department of Agriculture Web-based nutrition education resource for educators (Appendix F);
- and provides a timeline for FY 2005 planning and reporting (Appendix G).

This guidance is meant to provide information on FSNE in conjunction with OMB Circulars, FSP regulations and policy memorandums. Due to the diversity of FSP nutrition education activities, a comprehensive listing of all allowable and unallowable costs is not practical. All judgments on what activities and expenses are "reasonable and necessary" are a Food and Nutrition Service (FNS) prerogative. Please refer to the information on allowable costs in Appendix C as you plan your activities for the upcoming FY.

Nutrition Education Plan Submission and Approval Process

Under current FSP regulations at 7 CFR 272.2(d), State FSP agencies have the option to provide nutrition education. State FSP agencies seeking federal funding for FSNE must annually submit a State nutrition education plan to FNS for approval. Two copies of the plan should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM).

State Agency Liability

State agencies are accountable for the contents of their nutrition education plan. They are responsible for making allowable cost determinations and are fully liable for repayment of Federal funds should those costs later be determined unallowable. FNS regional office financial management and program staff are available to provide technical and other assistance to State agencies in developing nutrition education plans. The State agency is responsible for providing technical assistance to any sub-grantees to ensure that all local projects are allowable and support the State's goals and objectives for FSNE.

Submission Deadlines

As specified under 7 CFR 272.2(e) of the regulations, officials of the State agency must sign the FSNE Plan and submit it to the FNS regional office annually no later than August 15 for the following federal FY's operation. States may submit a plan prior to the August 15 deadline and early submission is highly encouraged. Two copies of the plan should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM).
A final report on the previous year's activities is due annually by November 30. Submit two copies of the report to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM).

Contingent approvals for the upcoming FY may be made pending receipt of the final report. FNS reserves the right to withhold final approval of the subsequent year's plan pending receipt of this final report. A timeline for the submission process is located in Appendix G.

Plan Approval

Plans that are incomplete, filled with extraneous unnecessary information, or poorly organized impede the review process and will result in a denial or delayed approvals. To expedite approval, FNS recommends that the State agency do the following:

- ☑ Review the plan carefully to assure that it is consistent with the current Guidance. Both State agency program staff and the fiscal officer should review the plan to verify that all activities and costs are allowable, reasonable and necessary for the delivery of FSNE.
- ☑ Construct necessary waiver requests carefully and provide thorough justification and documentation.
- ☑ Use the recommended templates provided in Appendix A. These templates are designed to ensure that necessary information is included and can be easily presented in your plan. These templates are also available electronically at http://www.nal.usda.gov/foodstamp/National_FSNE.html .
- ☑ Integrate local project plans and reports into a single State plan and report.
    - o Describe all FSNE activities in your State using the recommended templates. Submit only one State plan and report even though multiple State sub-grantees may exist. Do not submit separate plans and reports for each sub-grantee in your State. For example, your plan should include one unified section describing the identified needs of the Food Stamp population in your State, FSNE goals and objectives for the State, etc. Demonstrate that local projects

support State goals and objectives and provide the requested details concerning each project's implementation, evaluation and budget.

- ☑ Limit the length of your State plan to not more than 150 pages excluding appendices and limit your final report to 50 pages excluding appendices. Use at least a twelve-point font, one-inch margins and number the pages of your plan. Provide clear and concise descriptions and justifications for the requested items.
- ☑ Verify that State officials have signed and dated the plan.
- ☑ Submit your Plan to your FNS Regional Office early (prior to the August 15th due date).
- ☑ Submit the previous year's final report to FNS by the November 30th due date.

Final Report Deadline Extension

By written request to the FNS Regional Office, States may ask to extend the deadline for Part I of the Plan (the Final Report). FNS reserves the right to withhold final approval of the current year's plan pending receipt of the Final Report.

Plan Amendments

State agencies must submit amendments to their plans to FNS for prior approval whenever there are increases in budget or changes in the scope of activities in an approved plan (see Appendix C: Cost Policy).

Management & Evaluation Review of State FSNE Projects

Regions select State FSNE projects for on-site review based on one or more of the following factors:

- amount of expenditures over the past FY relative to other States in the Region;
- rate of increase in the expenditures from one FY to the next;
- known or suspected difficulties in program administration or operation;
- and length of time since the State's FSNE services were last examined.

This review will assess whether:

- operations are consistent with the terms of the approved plan;
- activities are targeted to participating and potentially eligible clients in accordance with any approved waivers;
- projects are being evaluated for effectiveness;
- sources of State matching funds are allowable and not used as match for other Federal programs;
- administrative expenses are reasonable, necessary and properly documented and allocated;

- and States are aware how to submit developed materials to the National Agricultural Library, Food and Nutrition Information Center for inclusion on the Food Stamp Nutrition Connection Web site.

Focus of Food Stamp Nutrition Education

State plans should include behaviorally focused, science-based nutrition education interventions, projects or social marketing campaigns that fall within the focus of FSNE and are consistent with FNS priorities. The focus of FSNE is:

- Health promotion (helping people to establish healthy eating habits and an active lifestyle).
- Primary prevention of diseases (helping people who have risk factors for chronic disease prevent or postpone the onset of disease by establishing more active lifestyles and healthier eating habits).

The Dietary Guidelines for Americans are the foundation for science-based nutrition education in all FNS nutrition assistance programs. Therefore, messages delivered through FSNE must be consistent with the Dietary Guidelines for Americans (USDA, 2000). Please refer to the U.S. Department of Agriculture's Center for Nutrition Policy and Promotion Web site <http://www.cnpp.usda.gov/dietary_guidelines.html> for complete information on the Dietary Guidelines for Americans.

Nutrition Education Core Elements

Four core elements further outline the topical areas of FSNE: Dietary Quality, Food Resource Management/Shopping Behaviors, Food Security, and Food Safety. States should focus on these core elements when preparing their annual plan for nutrition education. States should especially emphasize the core element Dietary Quality and address it in a comprehensive manner. FNS is particularly interested in efforts directed at increasing the consumption of fruits and vegetables in low-income populations and interventions and activities that promote healthy weight through the balance of healthy eating and active living. Descriptions of the core elements are provided in Table I (page 13).

Coordination and Collaboration

The likelihood of nutrition education messages successfully changing behaviors is increased when consistent and repeated messages are delivered through multiple channels. Cross-program coordination and collaboration at the State and community levels includes working together toward a common goal to reinforce and amplify each other's efforts. Collaborative projects necessitate commitments of staff support and time, as well as cost sharing among all involved entities. In their FSNE Plan, States should describe how they are working with other FNS nutrition programs to consistently deliver behavior focused nutrition messages. Memorandums of Understanding are needed for all collaborative projects (see Part II, Section

B. Goals, Objectives, Strategies and Coordination).

TABLE I. FOOD STAMP NUTRITION EDUCATION CORE ELEMENT DESCRIPTIONS

Core Element	Definition
Dietary Quality	Applies to the nutritional value of food acquired and how well overall diets of food stamp participants compare to the Food Guide Pyramid and the Dietary Guidelines for Americans. Physical activity falls within this element with certain restrictions (see Appendix C for more information).
Shopping Behavior/Food Resource Management	Applies to the practices related to thrifty shopping for and management of food dollars. These include such skills as making shopping lists, reading labels for nutritional value, planning menus and basic cooking.
Food Security	Applies to the general well-being of a household in terms of assured access to an adequate supply of food at all times in order to support a healthy, active life. This includes a readily available supply of nutritious and safe foods and the assured ability to acquire these foods in a socially acceptable manner. Promotion of participation in the Food Stamp Program to eligible nonparticipating persons as part of nutrition education is a critical aspect of this element (see Appendix C: Section C.4 for additional guidance related to Outreach).
Food Safety	Applies to how food is handled. For example, it deals with issues such as hand washing, the length of time food may be left without refrigeration, the temperature at which food should be stored and whether food is properly and fully cooked.

Guidance for State Plan Preparation

The following section will take you through completing your nutrition education plan. The plan consists of two parts: Part I asks you to report on FY 2004 activities, and Part II asks you to report on FY 2005 planned activities. For the convenience of State agencies, we have provided optional templates in Appendix A for use in reporting information requested in this plan guidance. We strongly recommend the use of these templates since omitted, incomplete or poorly organized information will delay nutrition education plan review and approval or result in a denial. Prior to writing your plan, review all guidance carefully to ensure that your plan meets basic requirements.

Part I. Final Report of FY 2004 Nutrition Education Activities

Summarize the nutrition education projects specified in your FY 2004 Plan. This final report is due to your FNS regional office by November 30, 2004. Additional information regarding submission deadlines may be found on page 10.

Section A. State Nutrition Education Report Summary

This section of the report is designed to provide a quick look at all FY 2004 FSNE in your State. In table format (see Template 1, Appendix A), summarize your State nutrition education projects and social marketing campaigns. A project is a discrete unit of nutrition education intervention at the local level. A social marketing campaign is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior (see full definition in Appendix D). The following information should be included in your report summary:

1. Name of project or campaign (should correspond with the project name in your 2003 plan).
2. Geographical areas reached (counties or statewide).
3. Type and number of delivery sites (list the type and number of locations where classes were delivered, not the number of times classes were delivered). For example, list the number of unique congregate meal sites where classes were delivered in the State.
4. Length of any social marketing campaigns (i.e., number of months).
5. Description of the target audience to whom the project was delivered.
6. Primary nutrition education methods (one-on-one counseling, social marketing, group sessions/classes, etc.).
7. Core elements covered.
8. Key message(s).
9. Type of evaluation (formative, process or impact).

Section B. Contact Summary Data

In table format (see Appendix A: Optional Plan and Report Templates, Template 2), provide the number of contacts with audiences reached through FY 2004 FSNE for each project as well as aggregated State totals. Report contacts made through direct and indirect (including social marketing) activities. States may report contacts with persons or households; however, reporting the number of contacts with persons is preferred. If available, we highly encourage States to report contacts with FSP participants or FSP households specifically as well as the total number of contacts.

1. **Direct Contacts-** refers to the number of face-to-face contacts via one-on-one counseling or group/classroom education. Please specify whether you are reporting contacts with persons or households.
    - If available, provide the number of contacts with **FSP participants or FSP households** made through direct FSNE activities. For example, if a FSP participant attends 8 FSNE classes, record 8 contacts.
    - Also, provide the number of contacts with **all persons or households** made through direct FSNE activities. For example, if 10 people attend all 8 classes, record 80 contacts.

2. **Indirect Contacts** are made through the delivery of nutrition education to a household or a person through an indirect and generalized strategy, such as health fairs, waiting room brochures, Web-based modules, newsletters, and social marketing campaigns. Please specify whether you are reporting contacts with persons or households.
    - If available, provide the number of contacts with **FSP participants or FSP households** made through indirect FSNE activities. For example, if a FSP participant receives 8 newsletters, report 8 contacts.
    - Provide the number of contacts with **all persons or households** made through indirect FSNE activities. For example, if a radio PSA is played two times to an estimated listening audience of 8,000 low-income persons, report 16,000 contacts.

Part II. Proposed FSNE for Year 2005

Section A. Needs Assessment of the Food Stamp Population

Include the following in your needs assessment summary. We recommend the use of Template 3 in Appendix A for this section.

1. Describe and justify your methodology for assessing the needs of FSP participants in your State and report your findings. States should first gather needs assessment data from existing data (secondary data collection). Primary data collection (focus groups, surveys, and key informant interviews) may occasionally be needed to fill in gaps identified in secondary data collection. States must clearly describe and justify any proposed primary data collection and identify the anticipated product. This formative research must supplement (not duplicate) existing data and directly relate to the implementation/delivery of FSNE. Additional information on the collection of needs assessment data is available in *Needs Assessment Resource Manual: A Guide for State Nutrition Education Networks* (US Department of Agriculture, Food and Nutrition Service, 1997) at http://www.fns.usda.gov/oane/MENU/Published/nutritioneducation/Files/NeedsAssmt-Man.pdf

   The following information should be addressed in this section of your plan:
   a. Characteristics of the Food Stamp population in your State (race/ethnicity, age, gender, family composition, education, and language).
   b. Nutrition-related information pertaining to the Food Stamp population in your State (dietary habits, food purchasing habits, and prevalence of diet-related diseases)
   c. Availability of outside nutrition-related programs, services, and social marketing campaigns that target low-income populations in your State.
   d. Under- and un-served Food Stamp populations in your State.

2. Based on the nutrition concerns identified above and the current availability of other nutrition education services, describe and justify what areas your State will address through FSNE and any audience segmentation. Note that all areas and strategies used to address identified issues must fall within the scope and focus of FSNE. Indicate which issues you addressed in FY 2004 and which ones you plan to address in FY 2005.

   The Food Stamp Act requires that nutrition education activities be directed exclusively to FSP applicants and participants. States may request exclusivity waivers for projects that will inadvertently reach non-FSP participants/applicants because:
   - **it is not practical to separate out FSP participants from a group of low-income persons;**

- **and/or it is not possible to ascertain FSP participation.**

Refer to Appendix C for further information about the justification and documentation needed for waiver approval. See Appendix D for a definition of "project".

Section B. Goals, Objectives, Strategies and Coordination

Template 3 in Appendix A will assist you in completing this section. List your behavioral goals and objectives and the educational strategies and vehicles you will use to achieve them.

1. Identify State nutrition education goals and measurable objectives. Your goals should illustrate the overall purpose of FSNE activities. A well-written and clearly defined objective is **S.M.A.R.T.**:
    a. **S**pecific. It identifies a specific event or action that will take place.
    b. **M**easurable. It quantifies the amount of change to be achieved.
    c. **A**chievable. It is realistic given available resources and the proposed FSNE activities.
    d. **R**elevant. It is logical and relates to the State's FSNE goals.
    e. **T**ime bound. It specifies a time by which the objective will be achieved. These objectives should be completed within the FY of the plan.

    Examples of S.M.A.R.T. objectives include:

    - After participating in two or more FSNE activities on pyramid serving sizes, adults will be able to select appropriate serving sizes for both adults and children.
    - After 6 1-hour classes, participants will consume one additional serving of vegetables per day.

    Your goals and objectives should be conceptually linked at State and local levels. Project level objectives should not be selected in isolation, but should support State FSNE goals.

2. Describe the methods and strategies that will be used to achieve your objectives including:

    - A brief summary of existing research supporting the effectiveness and feasibility of your nutrition education methods.
    - A justification for adapting or changing an identified intervention/project method or strategy.

- Strategies for implementing the project (type, intensity and delivery of nutrition education) as identified.
- Social marketing strategies for the development and dissemination of educational interventions.

3. Identify existing educational materials that you plan to use in the delivery of the intervention/project. Note if they are in languages other than English. FNS recommends that States use existing FNS materials (such as Team Nutrition, Loving Support, and Eat Smart. Play Hard™) instead of purchasing or reprinting other materials that target the same audience.

4. Identify any new materials that you plan to produce. To maximize resources and avoid duplication of effort, State agencies must assess existing materials prior to developing new materials for nutrition education efforts (see number 3 above). Existing materials, especially existing FNS materials such as Team Nutrition, Loving Support, and Eat Smart. Play Hard™, must be used and/or adapted whenever possible rather than developing new materials. The following collections of nutrition education resources are available to help States search for existing materials:

   - Food Stamp Nutrition Connection (see also Appendix F)
     www.nal.usda.gov/fnic/foodstamp/index.html
   - Eat Smart. Play Hard.™
     www.fns.usda.gov/eatsmartplayhard/
   - WIC Works Resource System
     www.nal.usda.gov/wicworks/
   - Team Nutrition
     www.fns.usda.gov/tn

   Describe your findings and justify why the development of any new materials is needed. If you plan to develop new materials, refer to "Important Notes About Materials" on page 20.

5. For each objective, provide performance measures or indicators of expected outcome. For example, change in behavior (ate one additional vegetable per day) or improvement in cooking skills (learned how to properly cook dry beans or peas).

6. For each objective, describe your evaluation plans. Evaluation is important for accountability, planning, and learning how to continuously refine and improve nutrition education for Food Stamp families to achieve positive behavior outcomes. The following three types of evaluation are appropriate and may be included in your State plan:

- Formative-which can involve pre-testing of draft nutrition education materials to answer questions about whether materials are understandable, relevant, credible and acceptable to the target audience;
- Process-which can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering nutrition education and/or barriers to implementing the intervention;
- and Outcome or Impact-to learn how effective the intervention was in changing the target populations' attitudes, awareness or behavior.

Evaluation efforts must have direct applications for FSNE delivery and ultimately benefit the FSP participant through project/intervention improvement. For information about program evaluation, FNS recommends the following guidance:

- Journal of Nutrition Education: 33, Supplement 1, 2001
- Evaluating Social Marketing in Nutrition: A Resource Manual
http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF
- WIC Evaluation Resource Guide
http://www.fns.usda.gov/oane/MENU/Published/WIC/FILES/WICEvaluationResourceGuide.pdf

7. Describe efforts to coordinate, complement and supplement other FNS programs in order to deliver consistent behavior-focused nutrition messages.
    - Specifically address your collaborative efforts with FNS Programs in your State (WIC, Child Nutrition programs, etc.), and describe your involvement in developing the State Nutrition Action Plan (SNAP). Outline any objectives/tasks related to the SNAP that FSNE will lead or conduct during the next year.
    - School interventions should include a description of ongoing collaboration efforts with the State's Department of Education and local school administration.
    - If FSNE will be delivered in coordination with another agency (i.e., WIC, Department of Education, food bank, etc.), the State must submit, with their plan, a copy of a Memorandum of Understanding that clearly outlines the responsibilities of all parties.

Important Notes About Materials

- States must ensure that all nutrition messages conveyed as a part of FSNE are consistent with the goal, focus, and core elements of FSNE as described on pages 12-13 of this Guidance. FSNE funds may not be used to convey negative written, visual, or verbal expressions about any specific foods, beverages, or commodities. This includes messages of belittlement or derogation of such items, as well as any suggestion that such foods, beverages, or commodities should never be consumed (see Appendix C). FNS regional office staff may ask to review media messages and materials prior to their release, particularly when States are planning large media campaigns and productions.

- FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROMs and related source codes, literature, or other products produced, in whole or in part, with FSP funds for government purposes. For more information, see Appendix C.

- Curricula must focus on improving the dietary quality of FSP participants and applicants and should contain related activities as a way of promoting health and preventing diet-related diseases. Materials with subject matter that is beyond the scope of FSNE, including the screening for diseases and the treatment and management of diseases, are not allowable.

- We encourage States to submit their materials to the Food Stamp Nutrition Connection Web site so that all may benefit. Appendix F provides detailed information about the Food Stamp Nutrition Connection.

- Materials developed or reprinted with FSP funds must include the following non-discrimination statement:

  "In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability."

  "To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer."
  Note: There are no print size requirements when the statement above is used. If the material is too small to permit the full statement to be included, the material must, at a minimum, include the statement, in print size no smaller than the text, that "This institution is an equal opportunity provider and employer."

- Credit must be provided to the FSP as a funding source. This credit line must appear on newly developed materials and reprinted materials. The following statements are recommended:
  - English: "This material was funded by USDA's Food Stamp Program."

- Spanish: “Este material se desarrolló con fondos proporcionados por el Programa de Cupones para Alimentos del Departamento de Agricultura de los EE.UU. (USDA para sus siglas en inglés). “

- A brief outreach message about the FSP must be provided on newly developed or reprinted materials. The following statements are recommended:
  - English: “The Food Stamp Program provides nutrition assistance to people with low income. It can help you buy nutritious foods for a better diet. To find out more, contact [enter your local office or toll-free number, or other useful information to help identify how to get services].”
  - Spanish: “El Progama de Cupones para Alimentos ofrece asistencia relacionada a la nutrición para gente con bajos ingresos. Le puede ayudar a comprar comida nutritiva para una mejor dieta. Para obtener más información, comuníquese con la oficina de servicios sociales de su condado.”

  This outreach message need not be included for audiences that are exclusively FSP participants.

Section C. Staffing

We recommend the use of Template 4 in Appendix A to provide the information requested on FSNE staffing. Please note that all staff must support the delivery of FSNE. On a per project basis, provide the following information for all staff in the coming FY budget that will carry out FSNE functions:

1. Position title.
2. Summary of duties associated with FSNE by project. This summary must clearly show how the position supports the delivery of planned FSNE activities.
3. Percent of time allocated for FSNE. Provide a breakdown of the percentage of time spent performing management/administrative (including training and professional development) duties verses direct delivery of FSNE to FSP participants.
4. Salary, broken down by Federal and State/other and total (estimate may be used for budget, but actual time spent must be used for billings).

Section D. Budget Summary

We recommend the use of Template 5 in Appendix A for the submission of this information.

1. Waiver Requests

   When non-FSP participants will benefit from FSNE projects because they cannot be separated out from FSP participants, States must submit exclusivity waivers for each project (7 CFR 272.3). See Appendix C, section A.3 for information on waivers and the justification and documentation required. To be considered, waiver requests must be completed on a “project” basis, meaning that they are requested for a defined geographical area with documented demographics to demonstrate that at least 50 percent of the target population’s incomes are at or below 185% of poverty.

2. Contracts, Grants or Agreements for Nutrition Education Services

   If the State agency intends to contract for FSNE with sub-grantees, list each sub-grantee that is a recipient of Federal grants, cooperative agreements or contracts related to FSNE. Include the following for each sub-grantee:

   a. Name of sub-grantee or contractor
   b. Federal funding requested
   c. State and other non-federal funding provided and source in terms of cash and in-kind sources
   d. Description of services
   e. Cost of services

3. Attach copy of any interagency agreement(s) that identifies how federal funds will be shared between the State or county agency and/or other agencies. Submit a list of all sub-grantees and amount of funding for each grant, noting both federal funding and funding from non-federal sources including cash and value of in-kind services. For each sub-grantee, provide the State and federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at a minimum the information contained in Appendix A, Template 5.

4. Travel
   Travel requests must be identified for both in state and out of state purposes. States must justify the purpose of the travel, describe how the travel request supports the State's FSNE goals and objectives, and demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff. Provide the following information for all State FSNE travel:

   a. Travel destination
   b. Purpose and justification for travel
   c. Number of staff traveling
   d. Cost of travel

Section E. Assurances
(Appendix A, Template 6)

To assure compliance with policies described in this guidance, the FSNE plan must include the following assurances that:

1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight of any sub-grantees. The State is fiscally responsible for nutrition education activities funded with FSP funds and is liable for repayment of unallowable costs.
2. Nutrition education activities are conducted exclusively for the benefit of FSP participants and applicants.
3. Exclusivity waivers have been submitted for each FSNE project that will benefit non-FSP participants and applicants because non-FSP participants cannot, practically or possibly, be separated out from FSP participants. Submitted waiver requests clearly identify FSP participants and applicants as the primary target audience for FSNE, document that the majority of persons/households to be reached through the proposed project will be the FSP

audience, and show that at least 50 percent of those reached will have a gross income at or below 185 percent of poverty.

4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional Food Stamp recipients or to provide additional education services to EFNEP clients who are FS recipients. In no case may activities funded under the EFNEP grant be included in the budget for FSNE.
5. Cash or in-kind donations from other non-Federal sources to FSNE have not been claimed or used as a match or reimbursement under any other Federal program.
6. Costs incurred by other State and/or local agencies for goods and services for FSNE and which are then donated to the Food Stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.
7. Documentation of State costs, payments, and donations for approved FSNE activities are maintained by the State and will be available for United States Department of Agriculture review and audit.
8. Contracts are procured through competitive bid procedures governed by State procurement regulations.
9. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB circulars governing cost issues.
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.
11. Program activities are reasonable and necessary to accomplish FSNE objectives and goals.
12. Materials developed with FSP funds include the appropriate non-discrimination statement, credit provided to the FSP as a funding source, and a brief message about how the FSP can help provide a healthy diet and how to apply for benefits.
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage, or commodity.

Section F. Signatures
(Appendix A, Template 7)

The nutrition education plan must be signed by both the State agency Nutrition Coordinator (or alternatively, the State FSP Director) and a State agency Fiscal Reviewer prior to submission.

Appendix A:
Optional Report and Plan Templates

Appendix A. Template 1: State Nutrition Education Report Summary

Section A. State Nutrition Education Report Summary- provide the following descriptive data for each project and social marketing campaign that took place during FY 2004.

State Summary of Projects.
A project is a discrete unit of nutrition education intervention at the local level.

Title	Location		Audience	Method	Content		Evaluation
Project Name	**Geographic Location** (statewide or counties reached)	**Type and Number of Delivery Sites** (i.e., 10 congregate meal sites)	**Note if this project was delivered to a specific segment of the FSP population**	**Primary Delivery Method** (i.e., one-on-one or group/classes)	**Primary Core Element(s) Covered** (Dietary Quality, Resource Management, Food Security, or Food Safety)	**Key Message(s)**	**Evaluation Type** (formative, process or impact)
(Example) FSNE Parent Project	Fairfax Co. Prince William Co. Alexandria City	15 schools	Mothers of elementary school children	Group/class	Dietary Quality	Be a role model: Eat breakfast with kids.	Process
1.							
2.							

Appendix A. Template 1: State Nutrition Education Report Summary

State Summary of Projects (Continued)
A project is a discrete unit of nutrition education intervention at the local level.

Title	Location		Audience	Method	Content		Evaluation
Project Name	**Geographic Location** (statewide or counties reached)	**Type and Number of Delivery Sites** (i.e., 10 congregate meal sites)	**Note if this project was delivered to a specific segment of the FSP population**	**Primary Delivery Method** (i.e., one-on-one or group/classes)	**Primary Core Element(s) Covered** (Dietary Quality, Resource Management, Food Security, or Food Safety)	**Key Message(s)**	**Evaluation Type** (formative, process or impact)
3.							
4.							
5.							
6.							
7.							
8.							

Appendix A. Template 1: State Nutrition Education Report Summary (continued)

State Summary of Social Marketing Campaigns.

A social marketing campaign is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of multiple tactics to reach a target audience.

Title	Location		Audience	Method	Content		Evaluation
Name of Campaign	**Geographic Location** (statewide or counties reached)	**Length of Campaign** (in months)	**Note if this campaign was delivered to a specific segment of the FSP population**	**Primary Activities** (radio PSAs, bus wraps, point of sale advertising, etc)	**Primary Core Element(s) Covered** (Dietary Quality, Resource Management, Food Security, or Food Safety)	**Key Message(s)**	**Evaluation Type** (formative, process or impact)
(Example) FSNE Fruit and Vegetable Campaign	Statewide	3	Adult Women	Bus wraps, radio PSAs, community posters	Dietary Quality	Eat 5-9 fruits and vegetables a day.	formative
1.							
2.							

Appendix A. Template 2: Final Report Contact Summary Data

Section B: Contact Summary Data

Provide contacts with audiences reached through FY 2004 Food Stamp Nutrition Education by project as well as State totals below. You may report contacts with persons or households; however, reporting the number of contacts with persons is preferred.

Direct Contacts with Persons

Record the number of face-to-face contacts made through one-on-one counseling and group/classroom education. Please report the number of contacts made with people (FSP participants and non-participants) NOT the actual number of people. Example: If 100 FSP participants each attend 5 FSNE classes, record 500 contacts with FSP participants.

Project Name	FSP participant contacts (if available)	Non-FSP participant contacts (if available)	Total contacts (Non-FSP + FSP participants) with persons
(Example) FSNE Classes	500	0	500
1.			
2.			
3.			
4.			
5.			
6.			
Total Contacts			

Direct Contacts with Households

Record the number of face-to-face contacts made through one-on-one counseling and group/classroom education. Please report the number of contacts made with households (FSP and non-FSP) NOT the actual number of households. Example: If 100 households each received 5 lessons, record 500 contacts.

Project Name	FSP household contacts (if available)	Non-FSP household contacts (if available)	Total contacts (Non-FSP + FSP participants) with households
(Example) FSNE Lessons	500	0	500
1.			
2.			
3.			
4.			
5.			
6.			
Total Contacts			

Appendix A. Template 2: Final Report Contact Summary Data (continued)

Indirect Contacts with Persons

Report contacts made through the delivery of nutrition education to a person through an indirect or generalized strategy, such as health fairs, waiting room brochures, distance education, newsletters and social marketing campaigns. Please report the number of contacts made with people (FSP participants and non-participants) NOT the actual number of people. Example: If 250 FSP participants each receive four FSNE newsletters, report 1,000 FSP participant contacts. If you made 400 additional contacts with other low-income persons via this newsletter, record a total of 1,400 contacts.

Project Name	**FSP participant contacts** (if available)	**Non-FSP participant contacts** (if available)	**Total contacts** (Non-FSP + FSP participants) **with persons**
Example: FSNE Newsletter	1,000	400	1,400
1.			
2.			
3.			
4.			
5.			
6.			
TOTAL Contacts			

Indirect Contacts with Households

Contacts made through the delivery of nutrition education through an indirect or generalized strategy, such as health fairs, waiting room brochures, distance education, newsletters and social marketing campaigns. Please report the number of contacts made with households (FSP and non-FSP) NOT the actual number of households.

Project Name	**FSP household contacts** (if available)	**Non-FSP household contacts** (if available)	**Total contacts** (Non-FSP + FSP participants) **with households**
1.			
2.			
3.			
4.			
5.			
6.			
TOTAL Contacts			

Appendix A. Template 3: 2005 Nutrition Education Plan Proposed Projects

Section A. Needs Assessment of the Food Stamp Population

1. NEEDS ASSESSMENT METHODOLOGY

How did you assess the needs of Food Stamp Participants in your State?

NEEDS ASSESSMENT FINDINGS

a. Characteristics of Food Stamp Program Participants in *[Your State]*

Discuss race/ethnicity, age, gender, family composition, education, and language.

Appendix A. Template 3: 2005 Nutrition Education Plan Proposed Projects (continued)

b. Nutritional Concerns of Food Stamp Program Participants in *[Your State]*

Discuss implications of dietary habits, food purchasing habits, and prevalence of diet-related diseases.

c. Other Nutrition-related Programs Serving Low-income Persons in *[Your State]*

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

d. Under- and Unserved Food Stamp Populations in *[Your State]*.

2. NEEDS ASSESSMENT APPLICATION

Based on the nutrition concerns identified above and the current availability of other nutrition education services, describe and justify what areas your State will address through Food Stamp Nutrition Education and any audience segmentation. Note that all areas and strategies used to address identified issues must fall within the scope and focus of Food Stamp Nutrition Education. Indicate which issues you addressed in fiscal year 2004 and which ones you plan to address in fiscal year 2005.

Appendix A. Template 3: 2005 Nutrition Education Plan Proposed Projects (continued)

Section B: 2005 State FSNE Goals, Objectives, Strategies and Collaboration

1. **GOALS & OBJECTIVES**

   Identify State nutrition education goals and measurable objectives.

2. **STRATEGIES**

   a. **Description of Projects and Social Marketing Campaigns**

   Discuss plans for reaching the target population. Identify local level interventions as well as State-based interventions.

   b. **Proposed Nutrition Education Methods**

   Explain strategies for implementing the project (type, intensity and delivery of nutrition education) as identified. Briefly summarize existing research supporting the effectiveness and feasibility of your proposed nutrition education methods. Provide justification for adapting or changing an identified intervention method or strategy.

3. EXISTING EDUCATIONAL MATERIALS

Identify existing educational materials that you plan to use in the delivery of the intervention/program. Note if they are in languages other than English.

4. NEW EDUCATIONAL MATERIALS

Identify any new materials that you plan to produce and justify their need.

Appendix A. Template 3: 2005 Nutrition Education Plan Proposed Projects (continued)

5. PERFORMANCE MEASURES/OUTCOME INDICATORS

For each objective, provide the performance measures or indicators of expected outcome, for example, change in behavior (ate one additional vegetable per day) or improvement in cooking skills (learned how to properly cook dry beans or peas).

6. EVALUATION PLANS

For each objective, describe your evaluation plans (formative, process or outcome).

7. COORDINATION EFFORTS

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

a. Other FNS Programs

b. *[Your State]* **State Nutrition Action Plan (SNAP)**

c. Department of Education and School Administration (for school projects)

d. Other

Appendix A. Template 4: 2005 Nutrition Education Plan Staffing

Section C. Staffing

Provide the following summary by Food Stamp Nutrition Education (FSNE) project for all staff in the 2005 budget. Provide the percentage of time allocated for FSNE Management/Administration (mgt) duties, direct FSNE delivery to participants, and total percentage of time spent on FSNE (management and direct delivery summed).

Project Name:							
1.Position Title	**2. Summary of FSNE Duties**	**3. % Time Spent on FSNE**			**4. Salary**		
		% Time FSNE Mgt./Admin.	% Time Direct FSNE Delivery	Total % Time FSNE (Mgt./admin + Direct)	State/Other	Federal	Total
				Totals			

Appendix A. Template 5: 2005 Nutrition Education Plan Budget Summary

Section D. Budget Summary

1. WAIVER REQUEST

a. Project name:

b. Project goals:

c. Narrative justification for need for waiver:
This narrative must document why it is not practical to provide FSNE exclusively to FSP participants without inadvertently reaching other audiences and/or that it is impossible to identify FSP participation.

d. Description of low-income population intended to be reached that are not the project's target population (Food Stamp Program applicants and recipients).

1. **Location of project:**
   (Low-income housing project, school, etc.)

2. **Demographic and census data documentation that demonstrates that at least half of this target population is at or below 185 percent of poverty:**

   a. Data source
   (Census, free and reduced price meal applications in schools, etc.)

   b. Data

Appendix A. Template 5: 2005 Nutrition Education Plan Budget Summary

Section D. Budget Summary

2. CONTRACT/GRANTS/AGREEMENTS FOR NUTRITION EDUCATION SERVICES

Fill this information in for each contract, grant, or agreement.

a) Name of sub grantee or contractor

b) Federal funding requested

c) State and other non-federal funding amount and source (allowable non-federal share). Include case and in-kind sources.

d) Description of services

e) Cost of services

Note: Total amount for all contract/grants to be entered as line 2 of budget summary (Template 5)

Appendix A. Template 5: 2005 Nutrition Education Plan Budget Summary

3. Travel

Travel expenditures are a variable cost. In order to be considered for funding, the request must provide a direct and clear link to providing quality nutrition education for food stamp recipients and those eligible. Provide the following information for all State FSNE travel:

a) Travel destination

b) Travel purpose and justification

c) Number of staff traveling

d) Cost of travel

Note: Travel to be entered as line 5 of budget summary (Template 5)

Appendix A. Template 5: 2005 Nutrition Education Plan Budget Summary

Section D. Budget Summary

2. Budget Information Project Name:						
Expenses	(a) State/Local Funds		(b) Other Non-Fed. Funds		(c)Total Non Federal Funds (a+b)	(d)Federal Funds
	Cash	In-kind	Cash	In-kind		
1. Salary/Benefits						
2. Contracts/Grants/ Agreements						
3. Non-Capital Equipment/Supplies						
4. Materials						
5. Travel						
6. Administrative						
7. Building/Space						
8. Maintenance						
9. Equipment & other Capital Expenditures						
10. Indirect Cost						
11. Totals						

12. Total estimated outlays/costs (State, local, nonfederal, federal)	

Attach: Copies of interagency agreements to support line 2.

Appendix A. Template 6: 2005 Nutrition Education Plan Assurances

Section F.
To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education Plan must include the following checklist of assurances that:

1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight to any sub-grantees. The State Food Stamp Agency is fiscally responsible for nutrition education activities funded with food stamp program funds and is liable for repayment of unallowable costs.	☐ YES ☐ NO
2. Nutrition education activities are conducted exclusively for the benefit of Food Stamp Program participants and applicants.	☐ YES ☐ NO
3. Exclusivity waivers have been submitted for <u>each</u> FSNE project that will benefit non-FSP participants and applicants because non-FSP participants cannot, practically or possibly, be separated out from FSP participants. Submitted waiver requests must clearly identify Food Stamps participants and applicants as the primary target audience for FSNE, document that the majority of persons/households to be reached through the proposed project will be the FSP participants. and show that at least 50 percent of those reached will have gross incomes at or below 185 percent of poverty.	☐ YES ☐ NO
4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional Food Stamp recipients or to provide additional education services to EFNEP clients who are FS recipients. In no case may activities funded under the EFNEP grant be included in the budget for FSNE.	☐ YES ☐ NO
5. Cash or in-kind donations from other non-Federal sources to Food Stamp Nutrition Education have not been claimed or used as a match or reimbursement under any other Federal program.	☐ YES ☐ NO
6. Costs incurred by other State and/or local agencies for goods and services for Food Stamp Nutrition Education and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.	☐ YES ☐ NO
7. Documentation of State costs, payments, and donations for approved Food Stamp Nutrition Education activities are maintained by the State and will be available for USDA review and audit.	☐ YES ☐ NO

8. Contacts are procured through competitive bid procedures governed by State procurement regulations.	☐ YES ☐ NO
9. Program activities are conducted in compliance with all applicable Federal laws, rules, regulations including Civil Rights and OMB circulars governing cost issues.	☐ YES ☐ NO
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.	☐ YES ☐ NO
11. Program activities are reasonable and necessary to accomplish Food Stamp Nutrition Education objectives and goals.	☐ YES ☐ NO
12. Materials developed with Food Stamp Program funds include the appropriate non-discrimination statement, credit provided to the Food Stamp Program as a funding source, and a brief message about how the Food Stamp Program can help provide a healthy diet and how to apply for benefits.	☐ YES ☐ NO
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage or commodity.	☐ YES ☐ NO

Appendix A. Template 7: 2005 Nutrition Education Plan Signatures

Section G: Signatures

FOOD STAMP PROGRAM

Fiscal Year 2005

Annual Plan For Nutrition Education

for

STATE AGENCY: _____
FISCAL YEAR: __ __ __ __

DATE: _____

Certified By:

_____ _____
STATE AGENCY NUTRITION COORDINATOR DATE
or STATE FOOD STAMP DIRECTOR

Certified By:

_____ _____
STATE AGENCY FISCAL REVIEWER DATE

Appendix A. Template 8: 2005 Sample Time and Effort Documentation

Time and Effort Documentation for hours worked specifically on Food Stamp Nutrition Education

Name_____ **Location**_____ **Title/Position**_____

Month:	
Day	**Hours Worked**
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Month:	
Day	**Hours Worked**
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Month:	
Day	**Hours Worked**
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Employee signature & date:_____

Supervisor signature & date:_____

Quarter Total:

Adapted from Wyoming form, May 2003.

Appendix B:
Reporting and Record Retention Requirements

Form 366A-State Agency

In addition to submitting the nutrition education plan, State agencies must submit FNS-366A, Budget Projection Statement, for FNS approval. State agencies must report their projected requested Federal funding for nutrition education on FNS Form FNS 366A, line 17, Nutrition Education. This report is due August 15th in the FNS Regional office for the upcoming federal fiscal year.

Form SF-269-State Agency

The State agency must report nutrition education expenditures, in Column 17-Nutrition Education- on FNS Form SF-269. This report is to be submitted quarterly, 30 days after the end of each quarter. A final report is due 90 days following the end of the Federal fiscal year.

Record Retention and Management-State Agency and All Sub-grantees

Food Stamp Program regulations require that all records be retained for three years from fiscal closure. This requirement applies to fiscal records, reports and client information. Supporting documentation may be kept at the sub-grantee level, but must be available for review for three years from the date of quarterly claim submittal. Any costs that cannot be substantiated by source documents will be disallowed as charges to the FSP.

Appendix C:
Cost Policy

The following discusses the costs that can be approved for Federal reimbursement under an approved Food Stamp Nutrition Education (FSNE) Plan.

Food Stamp Program Reimbursement Structure

Under Section 16 of the Food Stamp Act of 1977, as amended, a State food stamp agency is reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved nutrition education activities. Because State costs, by law, are reimbursed, FSNE is not a "grant" program, which provides a set level of funding for specific activities for a specific period of time, nor is it technically a match program. It reimburses 50 percent of States' allowable expenditures. Nevertheless, the term "grantee" is used in this guidance to denote the State agency, and the term "sub grantee" is used to denote those entities that are under agreement with the State agency to provide services. Despite the use of this nomenclature, it is important to understand that the food stamp program operates as a reimbursable agreement. Federal funds reimburse States for only half of all allowable costs.

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 10% or by greater than or equal to $100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary (see State Plan Amendments page 48).

While plan activities are approved on an annual basis, allowable costs may be reimbursed in the subsequent year if the activity overlaps fiscal years or if payment for services delivered during the fiscal year was delayed. Nutrition education project obligations must be established in the fiscal year the funds are appropriated but disbursements against these obligations may occur after the fiscal year closes. Federal reimbursement is subject to the availability of Federal funds. States agencies have a 2-year deadline to claim prior year costs. Expenditures must be submitted within 2 years after the calendar quarter in which the State (or local) agency incurred the cost.

Allowable Costs

Allowable costs are specified under OMB Circulars A-87, A-21,A-110 and A-122, Departmental rules at 7 CFR 3016 and FSP rules at 7 CFR Part 277. To be allowable, all costs charged to FNS must be valid obligations of the State, local government or sub-grantee and must be necessary and reasonable as charges under an approved Plan.

State Plan Amendments

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 10% or by greater than or equal to $100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary. In these instances, a State must submit a plan amendment prior to incurring the expenses for Federal approval to ensure that costs are allowable, reasonable and necessary. 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.

A. Allowable and Unallowable Administrative Expenses

Allowable administrative costs are operational costs for FSNE , which include all administrative expenses that are reasonable and necessary to operate approved nutrition education activities. Allowable administrative expenses include:

- salaries and benefits of personnel involved in FSNE and administrative support;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of food stamp educational materials when no other appropriate materials exist (see pages 18-19);
- lease or rental costs;
- maintenance expenses;
- other indirect costs;
- and charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

Unallowable administrative expenses- Listed below are unallowable costs per A-87 and A-21 for State and local governments: (Similar lists are found in A-110 and A-122, the Circulars applicable universities and non-profit organizations).

- Bad Debts-uncollected accounts or claims, and related costs.
- Contingencies-contributions to an emergency reserve or similar provision for unforeseen events. (these are not insurance payments which are allowable).
- Contributions and Donations (usually these are political in nature).
- Entertainment-costs that are primarily for amusement or social activities. (This is actually one with a lot of exceptions. Meals for example are cited in the Circular, but within the context of training, meals might be allowable. There are a number of costs here that require a "reasonable judgment" based on why or when the activity takes place).
- Fines and Penalties-violations or penalties for failure to comply with Federal, State, or Local laws.
- Governor's Office-specifically costs of general government. Costs which may be directly charged to a Federal grant may be allowable. (For example if a person assigned to the governor's office devotes 100 percent of his/her time to the Food Stamp Program, the cost may be allowable. Each situation, however, must be judged on its own merit).

- Indemnification-payments to third parties and other losses not covered by insurance.
- Legislative Expenses.
- Losses Not Covered by Insurance (see Indemnification above. These costs are similar, but not the same).
- Under Recovery of Costs under Federal Funding Agreements-shortfalls in one grant cannot be charged 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 agencies benefit from the activity funded. However, an allocations basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic Beverages.

For *A-21* there are some *unallowable cost* categories in addition to those listed above:

- Advertising and Public Relations- Unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant.
- Alumni Activities.
- Commencement and Convocations.
- Legal Fees Which Result From a Failure to Follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive Lobbying.
- Goods and Services for Private Use.
- Housing and Personal Living Expenses.
- Interest, Fund Raising, and Investment Management- (For interest, there are exceptions. But if the cost is shown it needs to be examined in light of the exceptions.)
- Any and All Political Party Expenses.
- Pre-agreement Costs- All costs incurred prior to the grant award.
- Scholarships and Student Aid-(There are exceptions which should be reviewed if these costs appear in budget.)
- Student Activity Costs.
- Travel-Allowable but with restrictions as to amounts involved, level of transportation costs (i.e. no first class tickets).

Reasonable and necessary costs

While the OMB circulars spell out what is allowable, costs that may be covered by the FSP for nutrition education must also meet a “reasonable and necessary” test.

Reasonable Costs

- Provide a program benefit generally commensurate with the costs incurred,
- Are in proportion to other program costs for the function that the costs serve,
- Are a priority expenditure relative to other demands on availability of administrative resources, and
- Carry constructive nutrition education messages consistent with dietary guidelines

Necessary Costs

- Are incurred to carry out essential functions
- Cannot be avoided without adversely affecting program operations
- Do not duplicate existing efforts

Note: Remarks in parentheses represent clarification by the Food and Nutrition Service and are not Circular language.

A.1 Property Procurement and Management

The State agency and all sub-grantees must follow procurement requirements found in 7 CFR 3016.

The State agency must receive prior Federal approval before procuring or requesting reimbursement for equipment valued at more than $5,000 per item. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project. Inventory records must be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

A.2 Indirect Cost Rate

Indirect cost computation is based on policy prescribed by the Office of Management and Budget (OMB). The intent of the OMB policy is to ensure that the Federal Government bears its fair share of costs in accordance with generally accepted accounting principles.

Indirect costs are defined as those that benefit more than one program but are not easily identified to a specific program. The general rule is that if a cost can be readily attributed to a specific program it should be classified as a direct cost rather than be included in the indirect cost pool.

One basic computation method is to 1) identify all the costs that are considered indirect costs because they serve several programs (e.g., payroll, computer center, personnel), 2) total indirect costs, 3) identify all the programs that are served by indirect costs 4), total the direct costs of all the programs served. Divide total indirect costs by total direct costs, which results in an "Indirect Cost Rate." This rate is then applied to the direct costs of each program (in this case nutrition education) and the result is charged to the program as its "indirect cost."

Indirect Cost Plans and Applicable Rates- The use of indirect cost plans by colleges and universities is allowable. However, unless justification is provided, only the off-campus rates may be used. In addition, if additional categories, such as "other sponsored activities", are covered, the instructional rates can not be used without justification. In most 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 must be based on where the majority of the allowable activities take place. In this case the allowable activities are defined as those activities that provide nutrition education to the recipient population. Other activities, such as research and

data analysis, while allowable, are not understood to be the primary purpose of FSNE, and therefore are not to be used in determining where the majority of the activities take place. Indirect costs at colleges and universities are limited to 26% of total modified direct costs, based on OMB Circular A-21.

Small local agencies may not have staff with the expertise to develop indirect cost rates. They should, however, be able to go to their State agency for assistance or obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs that are included as either direct or indirect costs.

- 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.

- The State agency must document its plan to indicate acceptance of the indirect cost rate.

State agencies are responsible for ensuring that indirect costs included as part of the State FSNE Plans are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement. FNS may request documentation in support of an indirect cost rate. See definitions in Appendix D for more information on "cognizant agency". Local agencies which do not have a cognizant agency to review and approve their rates may apply, through the State agency, for approval to use a rate developed either by or for the local agency. The FNS Regional office may accept or reject use of the rate based on the rate computation documents.

A.3 Waiver

Exclusivity Clause Waivers. Food stamp regulations require State agencies to provide "assurance" that nutrition education programs "are conducted exclusively for the benefit of Food Stamp Program applicants and participants" [7CFR 272.2(d)(2)(iii)]. These regulations are consistent with language in the Food Stamp Act. However, State agencies may pursue an "exclusivity waiver" on a project basis to allow certain projects to conduct activities that inadvertently reach other low-income individuals that are not currently participating. Project is defined in Appendix D as "a discrete unit of nutrition education intervention at the local level with a specifically identified low income target population".

The waiver request must document, on a project basis that:

- It is not possible to provide FSNE exclusively to FSP participants without inadvertently reaching other audiences because it is not possible or practical to identify FSP participation or to specifically single FSP participants out for nutrition education without reaching others (i.e., social marketing campaigns and media communication).

- The project is targeted to FSP participants and applicants. The waiver must indicate the projected number of people the intervention will reach, estimated number of total

contacts and number or percentage of contacts that will be FS participants/eligibles versus other low-income audiences.

- At least 50 percent of the population targeted has gross household incomes that are at or below 185 percent of poverty. In developing data for waiver requests, general census, demographic data, school lunch free and reduced price data, and WIC participation data may be used to calculate the extent to which the population targeted meets the income criteria. Asking individuals for personal income data is not an appropriate means to determine whether the target audience is low income, and goes beyond the scope of data needed for waiver purposes. The Census data website is a good source of state county level statistics. See www.census.gov or www.fns.usda.gov/pd/fspmain.htm

Documentation to show that each project meets these criteria must be submitted in one or more waiver requests. States may submit a separate waiver request for each project or they may submit a listing of local projects for which they are seeking waivers. Statewide waivers are not permissible. The waiver request must contain project-specific information and supporting documentation in sufficient detail to ascertain that each project is targeted to FSP participants or potential eligibles. Each waiver request will be approved or denied separately, regardless of format, on the basis of supporting documentation. **Waivers will be approved only when documentation confirms that FSP participants and applicants are the primary target audience that will be reached and thorough waiver justification is provided.** To be approvable, such waiver requests also must provide for the project to offer an educational message about the FSP, its benefits, and how to apply as a part of the nutrition education provided.

Exceptions to Requirement for Exclusivity Clause Waivers

1. Food Distribution Program on Indian Reservations (FDPIR). Because persons eligible for the FSP may participate in FDPIR in lieu of the FSP, FDPIR participants may be targeted for FSNE <u>without waiver</u>, and will be considered as if participating in the FSP.

2. Categorically Eligible Persons. Persons eligible for the FSP by virtue of their allowable categorical eligibility consistent with FSP regulations at 273.2(j) may be targeted for FSNE without waiver.

Use of Private Cash Donation Waivers. Federal regulations prohibit the consideration of private cash donations as part of a State's expenditures for which FNS will reimburse 50 percent. [7CFR277.4 (c) &(d)]. However, a waiver is permissible with the following assurances:

1. no endorsements of donors or products will be given in connection with the nutrition education activities.

2. no funds will revert back to donor or benefit the donor.

3. Funds are donated without restriction on use for a specific person, institution, or facility.

4. Funds are to be under the State's administrative control.

Assurances that these conditions are met must be included in the State agency's waiver request and noted in the nutrition education plan. As State agencies seek private cash donations, they need to understand these constraints. State agencies may also accept private in-kind donations, but they may not claim their value for FSP reimbursement. No waivers are available to permit private in-kind donations to be considered as part of the State's expenditures for which FNS will reimburse 50 percent.

A.4 In-kind Donations Not Involving Transfers of Cash

1. In-kind donations that are the value of volunteer time or other non-billable goods or services (e.g., there is no cash transfer between parties) are not allowable as charges to this grant if they are provided by non-governmental agencies. In-kinds from government agencies cannot be charged to another federal grant.
2. Goods and services requiring a transfer of cash are not in-kinds. However, goods and services that require a cash reimbursement by the sub-grantee may be charged as a cost, providing the cash reimbursement is based on a legally enforceable contract or agreement between the grantee and sub-grantee. An obligation to pay must exist for a sub-grantee to have a valid claim. FNS will then reimburse 50% of the outlay incurred by the grantee or sub-grantee.

A.5 Donations from Non-Federal Public Agencies

As specified under 7 CFR 277.4(c)(d)(e), Federal reimbursement for the costs of services or property donated by other non-federal public (i.e., government) agencies is allowable provided that the donated costs are not billed or claimed to another Federal program or used to match another federal program. The State agency must maintain records or an audit trail to support costs directly claimed or used as a match. The match must be for FSNE allowable activities.

A.6 Non-Federal Public Agencies

A non-federal public agency is an organization of State or local government that is supported by funds derived from general tax revenues (receipts) of a State or locality specifically allocated from appropriate budgetary authority such as a State legislature, county or local government. This would include, for example, State or local government financed educational institutions and State funded hospitals. Funding from non-federal public agencies serves as the foundation for calculating a State's total costs of FSNE, of which 50 percent is reimbursed with Federal funds.

The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in 7 CFR 277.4(c), can be interpreted to include "marketing orders, councils and commissions". OGC concluded that marketing orders, councils, and commissions may be included within the term, "non-federal public agency" for the purposes of using the donation as part of State cost for federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they

are engaged. To be included as State cost, the budgetary authority must be delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage must be governmental in nature. The activities must affect the right of private parties through adjudication, rule making, investigating, prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

The State agency must describe in the plan the source of the entity's regulatory authority and the nature of the activities in which the entity is engaged. The State agency must also describe the relationship of the entity to the objectives of the proposed nutrition education activity. Funding provided by the marketing order should be used to support objectives of the nutrition education activity benefiting the food stamp households. Marketing orders funding for FSNE should not be used to promote single-commodity nutrition education messages to the exclusion of the overall nutrition education objectives.

A.7 Medical Equipment & Clinical Health Assessments

FNS has determined, based on OMB Circular A-87, that medical equipment or health services related to health assessments of recipients, obtaining clinical data on nutritional status, chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. For example, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to administer dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.8 Gardening

Gardening is a beneficial project that leads to the economical production and consumption of healthy and fresh food. The provisions of OMB Circular A-87 allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies are not allowable FSNE costs. Only educational supplies, curricula and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. (Note that participants may use program benefits (coupons/EBT) to purchase seeds and plants for gardening purposes).

A.9 Valuation of Publicly Owned Space

Charges For Publicly Owned Space-Space owned by public entity cannot be charged to a Federal grant based on private market rental rates. The entity can only recover the costs of space through a depreciation schedule or use allowance, applicable charges for utilities, maintenance, and general upkeep.

Federal requirements regarding the valuation of publicly owned space is contained in Office of Management and Budget (OMB) Circulars A-87, 21, and A-110 and Departmental regulations at 7 CFR 3016 and indicate that in no case may publicly owned space be

"donated" or billed at fair market rental rates. The only method allowable for calculating reimbursement of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space regardless of whether they are direct billed or donated. The cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and utilities. (FNS Policy Memorandum-March 9, 1998)

Example of Calculating Valuation of Publicly Owned Space-Only the depreciation or use allowance method may be used to charge FNS for use of publicly owned space. Depreciation is dividing the cost of the building over its useful life. For example, if a building cost $50,000 to build and it had a useful life of 20 years, the yearly depreciation would be $2500. This cost is spread over the square footage of the building, resulting in an annual rate per square foot. FSP share would be the amount of space that is used for the FSP. A use allowance is used when the building is fully depreciated. You are allowed to charge no more than 2 percent of the cost of the building per year. In the example above, States could only charge $1000 per year.

A.10 Time Records

Weekly time and effort reporting is required by FNS for staff paid through the nutrition education funds for Food Stamp recipients and those contributing to this work through cost share. Additionally, records must be maintained for third party contracts of less than 100 percent time.

Time records are used to calculate the charges for time spent on allowable activities. The administrative office which converts hours worked into dollars charged must also maintain accounting records that substantiate the charges incurred. Costs charged based on time and effort reporting would include salaries and fringe benefits for staff employed. These costs must relate to the total accounting documentation maintained by the organization that is asserting the claim.

Staff Devoting 100 Percent of Time to FSNE

- A semi-annual time and effort certification by a supervisor is required.

Staff Devoting <u>Less Than</u> 100 Percent of Time to FSNE

- Time records are required for all nutrition education staff devoting less than 100 percent of their time to FSNE unless a federally approved Random Moments Time Study is used to allocate the time spent on allowable activities. Universities and colleges that are approved for Plan Confirmation by the Department of Health and Human Services are also exempt from the time record requirement.
- Budget sections of State plans should confirm that time records are documented.
- Time worked on FSNE must be reported in hours, and not percentage of time to the project.
- A sample form for keeping time and effort documentation is available in Appendix A (see Template 8). However, States may develop their own form that includes appropriate space to enter hours spent on FSNE, date, and employee and supervisor signatures. Only time spent on FSNE needs to be entered on the form.

- If a University has a procedure for hourly documentation already in place, it may meet the reporting requirement.
- The time and effort forms should be maintained at the work site and available for review/audit for a period of three years.
- Grantees who have Federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities. State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS regional office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy of the time estimate. Time records need not be submitted with the plan but should be maintained by the project for audit.

A. 11 Memberships, Subscription, and Professional Activity Cost

Cost of institution memberships in business, technical, and professional organizations are allowable. These memberships, subscriptions, and professional activity costs must be consistent with the effort to promote the provision of quality nutrition services to Food Stamp participants. Costs of institutional memberships for nutrition personnel that work directly with the FSNE project are reimbursable. The cost to the institution must be prorated according to the percentage of time actually spent by the employee in performing nutrition education activities for the food stamp project. Professional registration or license fees paid by individuals would not be allowable costs since the fees would be considered personal expenses, not institutional expenses.

A.12 Nutrition Education Reinforcement Materials

Nutrition education reinforcement materials refers to a class of goods that are given to applicants, participants, potential participants, or persons closely associated with the FSP (such as staff) containing or conveying good nutrition messages for the purpose of reinforcing nutrition messages and promoting good nutrition practices and increased physical activity. Such items must have a direct relationship to program objectives and the expected behavior change. Other terms that are used to describe these items include memorabilia, souvenirs, promotional items, incentives, and educational extenders. Such items are allowable costs only if they are deemed reasonable and necessary, contain or reinforce good nutrition messages, and are of nominal value ($4.00 or less per item).

FNS could not relate program reinforcement materials to any of the cost items specifically mentioned in the OMB Circular A-87 and A-122. FNS/USDA must, therefore, apply the circulars' general rule for determining the allowability of costs, paramount among which are the reasonable and necessary cost tests.

Program reinforcement materials for nutrition education also must:

- be targeted to FSP participants;
- have a clear relevance and useful connection to particular FNS/FSP nutrition education messages;

- either contain an educational message or have a use that is directly relevant to reinforce nutrition education messages (example, disposable thermometer to reinforce food safety);
- have value as nutrition education aids;
- be reasonable and necessary in terms of cost and relevance;
- be offered only after weighing and assessing other relative needs and cost effectiveness;
- be of nominal value of $4.00 or less per item;
- and not be used solely for staff morale boosters.

If the reinforcement material is designed for physical activity promotion, it must be provided in conjunction with relevant nutrition and physical activity message

Examples of Allowable and Unallowable Program Reinforcement Materials
FNS/USDA is not able to provide exhaustive lists of specific allowable and unallowable items. However, using the criteria listed in the preceding paragraph, some illustrative examples of allowable and unallowable program reinforcement materials are provided below:

Examples of Allowable Nutrition Education Reinforcement Items:
Calendars that contain important nutrition education messages, refrigerator magnets picturing the Food Guide Pyramid, measuring cups, measuring spoons or other items of nominal value which reinforce an important nutrition message. Examples of available messages include, Thermy™ the food thermometers' safety message ("It's safe to bite when the temperature is right"), the 5 A Day Campaign, or USDA's EAT SMART. PLAY HARD.™ Campaign.

Examples of Unallowable Nutrition Education Reinforcement Items:
Celebratory items, and items designed primarily as staff morale boosters; items (even of nominal value) that are not reasonable or necessary and/or have no nutrition education message; any program incentive item intended for persons who are not FSP participants or applicants, or with a waiver, low-income non-participants; any item costing more than $4.00.

A.13 Physical Activity

The Dietary Guidelines for Americans <http://www.usda.gov/cnpp> provide the framework for nutrition policy in FNS nutrition assistance programs. The 2000 Guidelines embrace maintenance of a healthy weight and improved fitness level. As such, FNS supports the 2000 Guidelines concept on physical activity. The provisions of OMB Circular A-87 allow USDA/FNS to make reasonable judgments as to what is necessary and reasonable to deliver nutrition education. Given the Dietary Guidelines for Americans, the inclusion of physical activity promotion as a part of the FSNE is an allowable expenditure.

The following is guidance on what constitutes allowable FSNE costs in support of the physical activity Dietary Guidelines for Americans. Essentially, such allowable costs are limited to activities that educate about and promote physical activity, such as providing FSP

participants with information and encouragement to exercise, brief exercise demonstration, and referral to local resources.

It is recommended that State agencies balance program goals for promoting and supporting physical activity with other competing priorities, cost accountability issues, and liability concerns. The latter is crucial because of the risks associated with engaging in physical activity, which must be seriously considered.

The following form the basic principles of FNS FSP 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, such as Eat Smart. Play Hard™.

- All programming such as workshops, conferences, and trainings that encourages physical activity must include a focus primarily on promotion of healthy eating behaviors. Activities may include one-time physical activity demonstration for participants and training for staff to develop skills and to help participants.

- FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity materials that are reasonable and necessary.

- Existing materials, especially existing FNS materials such as Team Nutrition, Loving Support, Eat Smart. Play Hard™, etc., must be used and/or adapted whenever possible rather than developing new materials. Purchase and use of existing successful model interventions developed by others would be preferable to developing new materials. If new materials are developed, documentation of why existing materials are inadequate is required.

- FNS program cooperators are encouraged to coordinate with community, faith-based, youth and recreational organizations, and others whose primary mission is to make regular opportunities for physical activity accessible and to make a listing of these resources available to Program participants.

<u>Examples of Unallowable Physical Activity Education and Promotion Costs</u>
Incentives and reinforcement items must be reasonable and necessary based on established cost principles (OMB circular A-87, A-122 and A-21) and criteria of specific nutrition assistance programs and may not exceed $4.00 per unit.Costs incurred for health club or gym memberships, dues, equipment, (such as bicycles, treadmills, stair steps, weights, and the like); facilities (rental or modifications); ongoing classes, exercise leaders for ongoing exercise classes. Note that the educational reinforcement items meeting the definition in A.12 above are permitted when they are of nominal value ($4.00 or less per item).

<u>Examples of Allowable Physical Activity Education and Promotion Costs</u>
FSP State agencies may make physical activity education and promotion coupled with nutrition education available to FSP participants in a variety of economical ways.

The development of educational materials to teach physical activity concepts and to reinforce the health benefit of physical activity are allowable costs when these activities also promote nutrition education.

As customary, before developing new materials, look to resources available through FNS and other Federal and State sources, including other credible sources. If new materials are needed, justify their development. Also, when developing materials, we recommend the utmost care be taken in the assessment of the target audience and its needs in the accuracy of physical activity statements and advice is strongly recommended. A certified physical fitness professional should be consulted throughout the development phases of these materials. The cost of such consultation is allowable if it meets a reasonable and necessary test.

Purchases of educational materials promoting physical activity for program participants. Examples of educational materials include brochures, newsletters, posters, public service announcements, and audiotapes, videotapes, and DVDs. These materials may be purchased or obtained free from reliable sources such as government organizations, physical activity associations, or other authorities on the subject.

Physical activity education and promotion as part of nutrition education sessions in the FSP may include provision of advice, demonstrations (instructional in nature, and not for ongoing classes), and community resource information, (such as a free local fitness event) in order to encourage program participants to engage in regular physical activities. Consistent with A.12 above, program reinforcement items that are reasonable and necessary to reinforce increased physical activity, and that cost $4.00 or less are allowable.

<u>Additional examples of acceptable physical activity promotion may include:</u>

- Information on local sites where FSP participants can access a diverse range of low or no-cost activities appropriate for different ages and physical abilities.
- Physical activity bulletin boards or displays around the food stamp offices, clinics or community.
- Referral to library or web site resources.
- Development and provision of information and resource lists to FSP recipients on how to promote safe and enjoyable physical activities. This information may also be available from:

    - Affiliates of voluntary health organizations (e.g., the American Heart Association).
    - State and local health departments.
    - Governor’s Councils on Physical Fitness and Sports.
    - National Fitness Coalition
    - Coalition for Promotion of Physical Activity
    - State associations for health, physical education, recreation, and dance.
    - National Centers for Chronic Disease Prevention and Health Promotion.

- Materials can be ordered in bulk from:

  The President's Council On Physical Fitness and Sports
  200 Independence Avenue SW
  Room 738-H
  Washington, D. C. 20201-0004
  www.fitness.gov
  www.presidentschallenge.org

  The American Dietetic Association
  National Center for Nutrition and Dietetics
  216 West Jackson Boulevard
  Chicago, Illinois 60606-6995
  www.eatright.org

- Another source of information is:

  National Recreation and Park Association
  22377 Belmont Ridge Road
  Ashburn, Virginia 20148-4501
  http://www.nrpa.org/
  Phone: 703-858-0794

A.14 Medical Nutrition Therapy

This is not an allowable cost. Medical nutrition therapy is not within the scope of the FSP. Since this activity is an unallowable cost for the Federal share of costs, it is also not allowable for use in meeting the State match. If a food stamp educator becomes aware of the need for an individualized diet or meal plan, the educator should refer to a local physician or dietitian.

Allowable FSNE includes those health promotion activities and interventions aimed at primary prevention of disease. These health promotion activities should be designed to help FSP participants and applicants establish and maintain active lifestyles and healthy eating habits. Primary prevention includes activities to help FSP participants and applicants prevent or to postpone the onset of chronic disease by establishing more active lifestyles and healthier eating habits.

Secondary prevention interventions and medical nutrition therapy are not allowable FSNE expenditures. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. See also Section A.7: Medical Equipment & Clinical Health Assessments. (See Definitions in Appendix D for a fuller discussion of medical nutrition therapy and secondary prevention interventions.)

A.15 Breastfeeding

All FSNE 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 FSNE supplementing existing WIC activities. A written Memorandum of Understanding stating the degree of collaboration and the specific responsibilities of WIC (i.e., staff, duties, and time) and the State should be included in the State FSNE Plan.

A.16 Travel and Meeting or Conference Attendance

Travel expenditures are a variable cost. In order to be considered for funding, the request must provide a direct and clear link to providing quality nutrition education for food stamp recipients and those eligible.

- **Travel Destination –** Travel requests must be identified for both in-state and out-of-state purposes.

- **Travel Purpose and Justification**
  - States must justify the purpose of the travel request.
  - States must describe how the travel request supports the State's FSNE goals and objectives.
  - States must demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff.

- **Number of Staff Attending**
  - Identify the number and type of staff making the travel request.
  - Justify the number and type of staff making the travel request.
  - For attendance at National level conferences, the request should be limited to no more than 4 staff persons per State.

Per Diem Rates - The standard requirements that State or Federal per diem rates must be used apply. In addition all travel restrictions found in the grant circulars (i.e. no first class tickets, etc) must be followed.

B. Sources of State Share Program Cost

B.1 Private, Third-Party, In-kind Donations (Non-cash Outlays)

The FSNE State plan is approved for a specified level of funding. The federal government reimburses the State for 50 percent of allowable costs incurred by the State. The federal government is authorized to reimburse a State agency only for actual expenditures incurred. Because the value of private, third party, in-kind donations, including volunteer services, do not represent any State expenditure or outlay, they are not considered as a cost to the program, and thus are not reimbursable.

As specified under 7 CFR 277.4(e), the value of services rendered or the value of goods (i.e., in-kind) donated by private, third parties, including volunteer services, are not allowable for reimbursement purposes under the FSP. However, State agencies are not prohibited from accepting private, third party cash donations.

B.2 Private, Third-Party, Cash Donations

Private, third party cash donations are not generally allowable for reimbursement purposes. However, the State agency may request a waiver. (See A.3 for Waivers)

B.3 Other Federal Funds

The State agency's share of program costs may not include funds paid by the federal government under another assistance agreement unless authorized under that agreement and its laws or any non-Federal funds contributed for another federally-assisted program unless authorized by Federal legislation. Consequently, federal funds provided by USDA's Cooperative State Research Education and Extension Service (CSREES) to the 1862 and 1890 Land Grant Universities or to the State's Cooperative Extension Service (and any State or non-federal match for those Federal funds) may not be used as part of the State agency's share of FSP costs. However, certain federal legislation supporting funding to Indian Tribal Organizations (ITO) contains "other Federal laws notwithstanding" language which allows tribal governing bodies to use Federal funds as matching to receive other federal funds. An ITO that chooses to submit a nutrition education plan for inclusion in the State plan can use federal funds as a local source of matching to request reimbursement for food stamp administrative funds.

In such circumstances, the State agency must provide assurance that the source of local matching funds is a federal grant containing the "notwithstanding" language, and must clearly specify the intention to use federal funds, the amount of the funds, the Federal agency source, and the citation that authorizes those Federal funds to be used as a match for other Federal funds. Also, a copy of the grant agreement between the ITO and the Federal agency must be available for review.

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights

The Food and Nutrition Service reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, photocopies, illustrations, computer programs such CD-ROM and related source codes, literature, or other products produced with FSP funds for government purposes. The State and local agencies may sell videos, photocopies, illustrations or literature to other States for FSNE purposes at the cost of reproduction, plus shipping and handling. If a State agency (or local agency) realizes a profit from the sale of nutrition education materials, [videos, literature, etc. paid with federal dollars], it must report the amount to FNS as program income on the SF-269 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. Prior to calculation of the reimbursement levels for State and Federal shares, total costs must be reduced by the amount of Program Income earned. 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.

C.2 Disclosure and Sharing of Case File Information

Under the provisions of both the Food Stamp Act of 1977, as amended, (the Act) and Food Stamp regulations, case file information on FSP recipients is considered confidential and may not be released unless certain conditions are met. Section 11(e)(8) of the Act provides a limited exception to the confidentially provision. Disclosure of information obtained from applicant households may be made only to persons directly connected with the administration of FSP.

Previous guidance noted that the Expanded Food and Nutrition Education Program, administered by the USDA Cooperative Extension Service, met the exception provision of the Act and could therefore request certain recipient information from the State agency. This was not intended to limit the exemption provision to this Program or agency. Any organization that has a legal agreement with the State agency, may, upon request to the State FSP agency, be permitted access to recipient information. Since the type of information requested may require State designed ad hoc reports, it is best to not request local offices to provide information. Request examples may include non-financial information such as name of head of households with children, address, telephone numbers, or address labels for all elderly by zip codes. The information may be released solely for administration of the FSP. In this case, this means for assistance in targeting and delivering nutrition education to food stamp applicants and participating households. The receiving organization must assure that the information is shared only with relevant persons for the purpose of the targeting and delivering nutrition education, and must protect it from disclosure to other parties. Each State agency will determine the scope and type of information, based on its judgment, that may be released for purposes of providing nutrition education to applicable households.

C.3 Scholarships and Tuition

OMB Circular A-21 makes a distinction between scholarships, fellowships, and other similar financial transactions, and tuition remission and similar work/study payments. For

scholarships, costs may only be charged if (1) the purpose of the scholarship is for training of selected students, and (2) approval is granted by the grantor agency. There would need to be a necessary and reasonable judgment for approval of any scholarship payment shown as a cost to FSNE. In general, this is not a cost that would be necessary and reasonable for the purposes of this grant. 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 FSNE is teaching nutrition education to food stamp recipients. 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 is:

1. There is a bona fide employer-employee relationship between the student and the institution for the work performed.
2. The tuition or other payments are reasonable compensation for work performed and are conditioned explicitly upon the performance of necessary work. Again any research activity should be carefully reviewed and in most cases not approved due to the fundamental differences in our grants and other grants provided for nutrition education.
3. It is the institution's practice to similarly compensate students in non-federally funded activities as well as federally funded grants.

Students who are working on FSNE under a tuition remission situation must account for their time, as would any full time or part time staff. The financial review of this charge must 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 FSNE. If the student is working 50% of their time on FSNE, only 50% of the tuition may be charged to FNS. Again, a necessary and reasonable judgment must be made as to purpose of the work and its impact on FSNE.

C.4 Examples of Allowable and Unallowable Costs

The following table provides some examples of allowable and unallowable costs

ALLOWABLE	UNALLOWABLE
Literature/Materials/Audiovisuals	
• The purchase of FNS nutrition education/promotion materials that address FSNE topics and are for use with FSP participants. • The purchase of other nutrition education materials, when there are no FNS materials available, that address FSNE topics and are for use with Food Stamp Program participants. • The production of nutrition education materials, for which there <u>is no other</u> <u>existing</u> <u>comparable material</u>, that support the State's goals and objectives for FSNE and will be distributed to FSP participants and applicants. It is encouraged that States collaborate with other FNS programs on the messages conveyed in and the costs of education materials. The State agency must describe the method used for allocating costs between the programs.	• Costs for any nutrition education materials that have already been charged to another federal or private program or source. • Any material that endorses or promotes brand name products or retail stores. • Manufacturer's or store (cents off) coupons. • Influencing a store's pricing policy. • Any activity or material to lobby or influence Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum or initiative. • Negative written, visual, or written expressions about specific foods, beverages or commodities. • Distribution of nutrition education reinforcement items over $4.00.
Social Marketing Campaigns	
• Local radio and television announcements of nutrition education events for food stamp applicants and participants. • Media announcements promoting nutrition messages to food stamp households within the community. With an approved project waiver, the target audience may be expanded to other low-income people.	• Social marketing campaigns to promote or present nutrition messages, which are not explicitly targeted to FSP participants or (with a waiver) low-income audiences within the community. • Nutrition education messages which convey negative messages or disparage specific foods, beverages or commodity, or which are not consistent with the Dietary Guidelines for Americans.

ALLOWABLE	UNALLOWABLE
Equipment	
• Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. (This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment.) • Equipment shared with non-FSP users that is cost-shared with those users. • Kitchen appliances only with justification of reasonable and necessary need.	• Electronic equipment that exceeds prior approval thresholds (i.e., $5,000) unless such prior approval is received from FNS. • Medical equipment.
Food Samples, Supplies and Provisions	
• Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation and display of food prepared for demonstration purposes. • Food samples associated with a nutrition education lesson.	• Ongoing snack or food service. • Meal size portions or complete meal service. • Cost of food provided as groceries or supplemental food.
Nutrition Education	
• Classroom setting (salaries, space, equipment, materials) for food stamp recipients on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class must be to provide nutrition education. If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. Schools must be public government entities for in-kind charges. • Physical activity demonstration, promotion, referral that includes a nutrition message.	• Classes that are designed to provide case management or "life skills" training (e.g., classes on English as a second language, parenting, child development, crisis management, rental information). • Medical nutrition therapy, and secondary prevention interventions (Refer to Appendix D, Definitions). • Weight loss classes, individualized meal plans, obesity treatment programs, etc. • Ongoing physical activity and exercise classes, equipment or facilities. (Refer to Appendix C: Physical Activity Cost Policy Section). • Clinical health screenings (i.e., cholesterol testing, body mass index and blood glucose testing, etc).

ALLOWABLE	UNALLOWABLE
• The pro rata share of costs of classes that are provided in conjunction with another program (e.g., WIC), provided the State agency describes the method for allocating costs between the programs. • Breastfeeding education, promotion and support which is coordinated with WIC and which supplements and complements WIC services, rather than supplanting them. • Activities where the primary objectives pertain to allowable nutrition education but brief FSP outreach messages are also shared with participants.	• Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.) • Breastfeeding education, promotion and support that duplicates or otherwise is provided for under other funding sources such as WIC, EFNEP, or Head Start. • Education provided to incarcerated or institutionalized persons that are not eligible for the FSP (i.e., persons in jails, prisons, nursing homes, mental institutions etc.) • Activities where the primary objective(s) is to conduct outreach efforts for the FSP.
Space Allocation	
• Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked. • Space donated by local school districts, but only the cost of space based on depreciation or use allowance.	• In-kind charges for space that is donated by a private third-party or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs), or the FSP, i.e. FSP county waiting room). • Commercial rental rates cannot be used for government owned spaced.
Training and Other Costs	
• Training for staff directly related to providing nutrition education to food stamp applicants/recipients. • General briefings to community health care providers serving low-income communities about FSP nutrition education in the community. • Reimbursement for personal costs (such as child care, meals, lodging, and transportation) for recipients of FSNE to actively participate in focus groups, needs assessments and advisory groups to inform and improve nutrition education effectiveness.	• University courses on technical or clinical subjects that are not relevant to the practical delivery of participant nutrition education. • Lobbying. • Costs associated with supporting and maintaining environmental or system changes in the community, such as staffing, infrastructure, equipment, space, land, construction or supplies. • Training or development costs of food service workers or others not directly associated with delivery of FSNE. • Personal costs for recipients to attend nutrition education classes such as childcare and transportation services. • Reinforcement items over $4.00. (Refer to Appendix C Cost Policy Section- Program Reinforcement Items)

Appendix D:
Definitions

These definitions are for clarification of terms that may be used throughout the guidance.

Activity refers to actual work performed by program personnel to implement objectives.

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

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, FSP, Child Nutrition Programs, Food Distribution Programs, etc).

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

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 A.2 Indirect Cost Rate in Appendix C.

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

Direct Contact is a face-to-face contact with a person or a household to deliver nutrition education, an educational class, workshop, group discussion, one-on-one intervention, etc.

Effectiveness is the extent to which pre-established objectives are attained as a result of program activity, as indicated by performance measures.

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

Grantee means the agency of the State responsible for administering the Food Stamp Program. Federal funds are paid to this agency for all food costs, and for 50 percent of all non-food expenditures, including program administration and nutrition education. The grantee in turn takes agreements with local agencies (sub grantees) to conduct nutrition education activities. Federal funds are made available to pay for half of all allowable nutrition education costs on a reimbursement basis.

Indirect Contact is the delivery of nutrition education to a household or a person through an indirect and generalized strategy, such as public service announcements, billboards, newsletters, and social marketing.

Lobbying is any activity or material to influence Federal, State, or local officials to pass, or sign legislation or to influence the outcomes of an election, referendum, or initiative.

Low-income Persons are people participating in or applying for the Food Stamp Program, as well as people with low financial resources defined as gross household incomes at or below 185 percent of poverty. National School Lunch Program data on number of children eligible for free and reduced price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where low income persons reside, are available data sources that can be used to identify low income populations. Participation in WIC may also be used as a proxy for low income since WIC participants have gross family incomes below 185 percent of poverty.

Marketing Orders generally refer to USDA or State programs that support prices and consumption of various fruits, vegetables, milk, eggs and meat programs. Funds are collected from the producers and used to publicize the item in question. Limits to production are also enforced. (For example both Florida and California have orange marketing order boards). With some constraints, money and services provided by marketing boards can compromise an allowable component of a State Plan. However, the promotion of a specific item (for example, only oranges) is not an allowable expense.

Medical Nutrition Therapy Services means the assessment of the nutritional status of patients with a condition, illness, or injury (such as diabetes, hypertension, gout, etc.) that puts them at risk. This includes review and analysis of medical and diet history, laboratory values, and anthropometric measurements. Based on the assessment, nutrition modalities most appropriate to manage the condition or treat the illness or injury are chosen and include the following:

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.

- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; parenteral nutrition delivered via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients.

Medical Nutrition Therapy Services are not allowable FSNE costs.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs of individuals and/or target populations in the community.

Non-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.

Nutrition Education Plan is an official written document that describes FSNE services to be provided. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

Plan Confirmation means a time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of Plan Confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of Plan Confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS (Normally this will not be an issue since audits normally occur at least every two years). For further information refer to 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

Project means a discrete unit of nutrition education intervention at the local level, which is distinguished by a specifically identified low-income target population. The term “Project” is intended to apply to a geographic area for the sole purpose of developing and supporting a request for an exclusivity waiver. Census data by zip code or census track are sources of documentation.

Public Education Outreach Message is a brief message providing information on the availability, benefits, and application procedures for the Food Stamp Program, preferably with information on local application sites, (or a toll-free number, or other useful information on how to find services). When FSNE is provided to low-income persons not participating in the Food Stamp Program, by virtue of approved waivers, a critical component of the nutrition message must be to provide an educational message about the availability and benefits of the program and how to apply. This should be done “in the context” of nutrition education, meaning the Food Stamp Program should routinely be referenced in nutrition education sessions and on materials as an important source of nutrition assistance to help low income persons achieve a better diet.

Random Moment Time Studies are time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities and funding sources.

Secondary Prevention Interventions mean activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. Secondary prevention interventions are not allowable costs in the Food Stamp Program.

Social Marketing is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of multiple tactics to reach a target audience.

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 Nutrition Action Plans are statewide nutrition education plans for the USDA nutrition assistance programs. These plans focus on a single goal and promote collaboration and use of integrated nutrition education approaches across FNS Programs to connect the efforts and resources of all the USDA programs to achieve that goal. During February 2003, State teams consisting of key staff representing USDA nutrition assistance programs developed the State Nutrition Action Plan for their state. The teams are working together to continue the development and implementation of the action plans.

Sub grantee means the organization or person to which a State agency, as grantee, takes an agreement to conduct nutrition education activities. Federal funds reimburse the grantee for half of its allowable administrative costs, including nutrition education. The grantee in turn generally will reimburse sub grantees for half of their allowable costs. The sub grantee is accountable to the grantee for the use of funds provided, and the grantee is accountable to The Food and Nutrition Service for the use of all Federal funds provided.

Appendix E:

List of Abbreviations

EFNEP- Expanded Food and Nutrition Program
FSNC- Food Stamp Nutrition Connection
FSNE- Food Stamp Nutrition Education
FNS- Food and Nutrition Service
FSP- Food Stamp Program
FY- Fiscal Year
OMB- Office of Management and Budget
SNAP- State Nutrition Action Plan
WIC- Special Supplemental Food Program for Women, Infants and Children

Appendix F:
Food Stamp Nutrition Connection Web Site

The Food and Nutrition Service (FNS) and the National Agriculture Library's Food and Nutrition Information Center (FNIC) sponsor an online resource, called the **Food Stamp Nutrition Connection**. This web site is designed to improve access to Food Stamp Program nutrition resources. Educators nationwide can use this site to identify curricula, lesson plans, research, training, tools and participant materials. The Food Stamp Nutrition Connection is available at www.nal.usda.gov.foodstamp

At the web site, you will find nutrition tools and information specifically addressing the needs of the low-income audiences. This resource is not restricted to materials developed with funding from the Food Stamp Program. Further, material on the site are reviewed for basic quality, but their inclusion on the site does not constitute endorsement by USDA. Major sections of the site include a Training Center, Resource Library, Hot Topics A-Z and Program facts.

We encourage you to subscribe to FSNC-Talk, an electronic mailing list for national, regional and State, and local Food Stamp Program nutrition education contacts. Information about how to join the list is available on the Food Stamp Nutrition Connection web site.

Also, you're invited to share your materials with FNIC so that others may benefit from your experience and expertise. A hard copy and an electronic copy of each document is preferred. Please submit nutrition education or training materials such as videos, curricula, games, handouts, booklets, displays, web-based modules, and lesson plans to the Food Stamp Nutrition Connection Resource System for use on the Web site or in the database. For details on how to submit materials, visit the Sharing Center on the Food Stamp Nutrition Connection Web site at this address: http://www.nal.usda.gov/foodstamp/Library/sharing_part1-2.html. You may also send an email to: FSNC@nal.usda.gov or call (301) 504-5414. If you would like to donate a copy of a new resource for review, please address it to:

Food Stamp Nutrition Connection
Food and Nutrition Information Center
USDA/ARS National Agricultural Library
10301 Baltimore Avenue, Suite 105
Beltsville, MD 20705-2351
Or you may use the following form as a handy way to submit items.

Continuing updates and new developments are planned for the Food Stamp Nutrition Connection website in the upcoming year-- so check back often for new additions. If you have any questions about the resource system or information provided, contact staff by telephone at (301) 504-5719, by fax at (301) 504-6409, or by e-mail at FSNC@nal.usda.gov

Food Stamp Nutrition Connection
Resource Sharing Form

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is PRA#0518-0031. The time required to complete this information will vary based upon one's relationship to the resource being submitted. It is estimated to take 19 minutes to complete the entire survey. This includes time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. If you need help with this form, please contact us. E-mail: FSNC@nal.usda.gov. Telephone: (301) 504-5039. TYY: (301) 504-6856.

Part 1. About You

Please provide your contact information in case we have questions about this resource. View our Privacy Policy at http://www.nal.usda.gov/policy/privacy.htm.

1. Your name:
2. Your e-mail address:
3. Which best describes your relationship to the resource you are submitting?

   m I developed this material (complete sections I-III)

   m I distribute or handle ordering for this material (complete sections I, II and IV)

   m I use this resource but I am not the developer or distributor of this material (complete sections I and II)

Part II. Resource Information

Please tell us about the material you are submitting.

1. Resource Title:_____
2. Developer/ Author(s):
   _____
3. Primary Author's Affiliation: _____
4. Publication/Revision Date:_____ Edition:_____

5. How is this material used?
   m Consumer Education
   m Staff Training
   m Background Information/Research

6. What languages are available?

7. If this resource is available online, please provide the web site address (URL).

_____

8. Briefly, describe your resource.

9. How do we contact the publisher/distributor?

Publisher Name_____

Street Address_____

City_____ State_____ Zip Code_____

Telephone_____ E-mail_____

Part III. Author/ Developer Information

Please share information about how this material was developed.

1. Please describe the target audience.

2. If you used a readability formula to test this material, please provide the following:

name of the formula used_____ score/grade level _____

3. Please describe any pilot studies conducted.

4. Does this material include a validated evaluation tool? ___Yes ___No

5. What is the funding source for the development of this material?

Comments:

Part IV. Publisher/Distributor Information

1. ISBN number (if applicable):_____
2. Please indicate how this material may be used by other educators.
   ___May copy for educational purposes without prior permission.
   ___Permission needed to copy.
   ___May not copy.

3. How can educators order this material?

4. What is the cost of this material? (price/unit)_____
5. Can this material be ordered in quantity? ___Yes ___No
6. Describe any bulk discounts available.

Comments:

Thank you for sharing your resource!

If you are completing a printed copy of this form, please return it to:
Food and Nutrition Information Center/FSNC
National Agricultural Library
10301 Baltimore Avenue
Beltsville, Maryland 20705-2351
Fax: (301) 504-6409

Appendix G:

Timeline

March 5, 2004	**2005 Guidance Available to States**
March 5-August 15, 2004	**States May Submit 2005 Plans to the FNS Regional Office**
August 15, 2004	**2005 Plans Due to FNS Regional Office**
October 1, 2004	**States May Receive Response/Contingency Approval for 2005 Plan from Region** if plans are submitted in an appropriate format and all necessary data is provided. Plans that are not in the format of the Guidance and/or do not supply data requested in the Guidance may require additional review and hence a longer approval time. Extraneous information and unnecessary documentation may also hinder plan review or result in a denial.
November 30, 2004	**2004 Final Report Due to FNS Regional Office**
November 30, 2005	**2005 Final Report Due to FNS Regional Office**