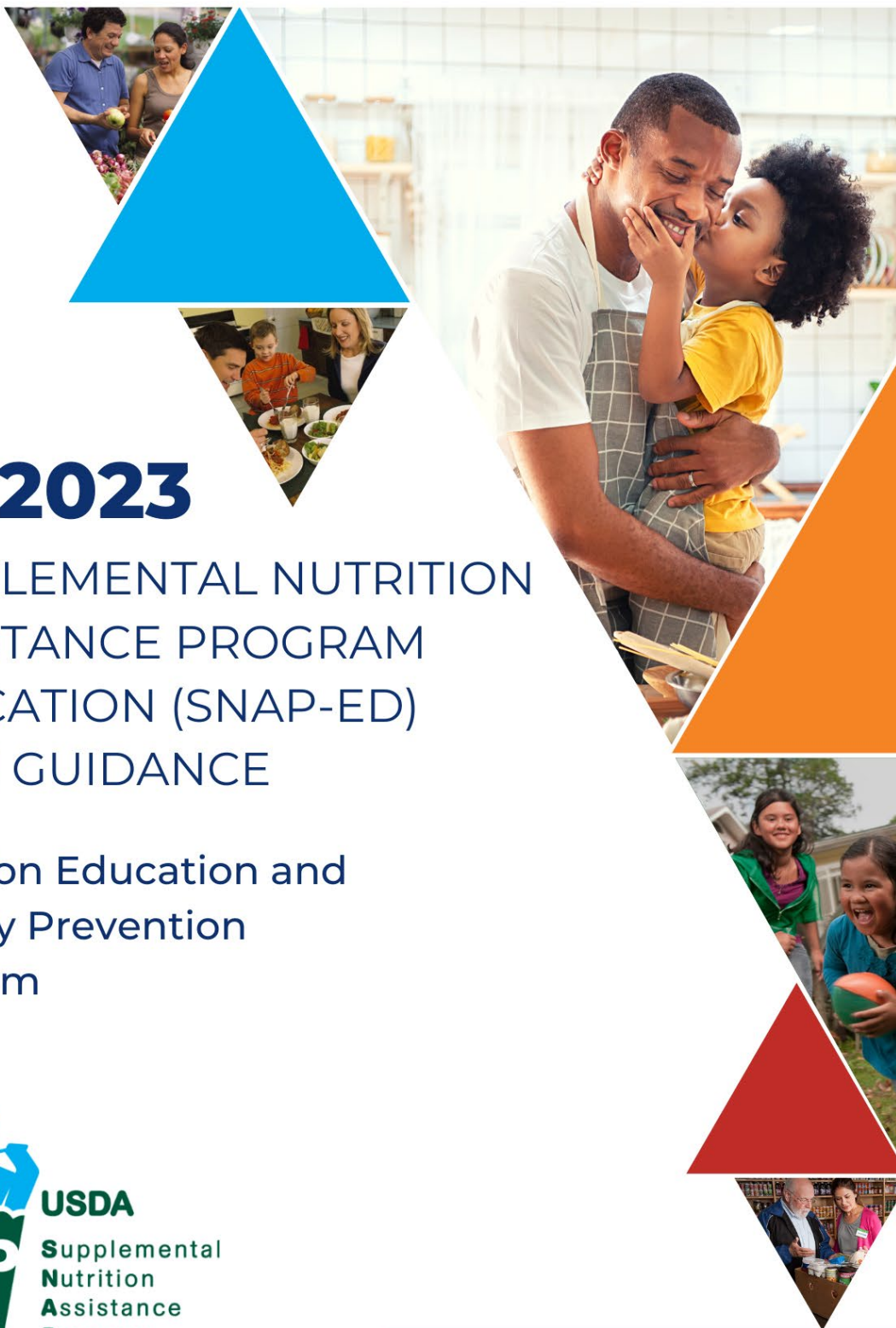


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Replaces:	FY 2022 Supplemental Nutrition Assistance Program Education Plan Guidance
Summary:	<p>This Fiscal Year (FY) 2023 Supplemental Nutrition Assistance Program Education (SNAP-Ed) Plan Guidance provides instructions to SNAP-Ed State and implementing agencies for developing and submitting State nutrition education and obesity prevention grant program plans, commonly referred to as State SNAP-Ed Plans, and preparing and submitting the Annual Report. It describes Food and Nutrition Service (FNS) expectations regarding State SNAP-Ed requirements and includes examples of activities that can be used in SNAP-Ed programming. Some sections have been broadened to provide additional instructions and, in some sections, new information has been added to provide more clarity. The SNAP-Ed Plan Guidance implements provisions of the Food and Nutrition Act (FNA), Section 28, as amended by the Agriculture Improvement Act of 2018 (7 U.S.C. 2036a) and 7 CFR 272.2(d)(2).</p>
Body of guidance document follows.	



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE



FY 2023

SUPPLEMENTAL NUTRITION
ASSISTANCE PROGRAM
EDUCATION (SNAP-ED)
PLAN GUIDANCE

Nutrition Education and
Obesity Prevention
Program



USDA
Supplemental
Nutrition
Assistance
Program

USDA is an equal opportunity
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Introduction

This Fiscal Year (FY) 2023 Supplemental Nutrition Assistance Program Education (SNAP-Ed) Plan Guidance provides instructions for developing and submitting State nutrition education and obesity prevention grant program plans, commonly referred to as State SNAP-Ed Plans. It describes Food and Nutrition Service (FNS) expectations for State SNAP-Ed requirements and includes examples of activities that can be used in SNAP-Ed programming. Instructions are provided for preparing and submission of the Annual Plan and Annual Report. Some sections have been broadened to provide additional instructions and, in some sections, new information has been added to provide more clarity.

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

New: In *SECTION 2: WRITING YOUR SNAP-ED PLAN & ANNUAL REPORT*, *THERE* are no significant substantive changes to the information collected for the SNAP-Ed Plan and Annual Reports. The templates are now called “modules” and the order of some modules has changed to align with the flow of future online forms, which are currently in the clearance process. In response to State and implementing agencies’ feedback, more

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

- State Plan and Annual Report modules clarification (p. [1](#), [45](#))
 - “Nutrition security” clarification (p. [5](#))
 - Broad-Based Categorical Eligibility income limits (p. [6](#), [50](#))
 - College students’ eligibility (p. [6](#), [50](#))
 - School site eligibility (p. [6](#), [51](#))
 - Start Simple with MyPlate and the MyPlate Quiz updates (p. [10](#))
 - FDA Nutrition Facts Label and Menu Labeling updates (p. [11](#))
 - Dietary Guidelines 2020-2025 (p. [12](#))
 - The Health Impact Pyramid (p. [15](#))
 - State Nutrition Action Councils (p. [29](#))
 - Updates on Maternal and Child Health Services Grants and Programs (p. [33](#))
 - Notification for SNAP participants and applicants (p. [37](#))
 - Timeline for Plan and Annual Report (p. [41](#))
 - Annual or multi-year plans (p. [41](#))
 - Annual progress of plans (p. [43](#))
 - Plan and report modules clarification (p. [45](#))
 - Plan modules (p. [45-74](#))
 - Annual report guidelines (p. [75](#))
 - Report modules (p. [78-93](#))
 - Staff training cost (p. [111](#))
 - Gardening cost (p. [115](#))
 - Nutrition education reinforcement materials cost (p. [117](#))
 - Plan modules summary (p. [124](#))
 - Annual report modules summary (p. [130](#))
 - SNAP-Ed Toolkit (p. [152](#))
- End of new material.**

Introduction

detailed instructions and resources are provided to facilitate needs assessment data collection and analysis during the planning process. Information on SNAP-Ed Evaluation Framework Indicators and social marketing reporting has been expanded to facilitate consistent and streamlined reporting. **End of new materials.**

The FY 2023 SNAP-Ed Plan Guidance supersedes previous releases and provides instructions to States to implement all provisions of Section 4019 of the Agriculture Improvement Act of 2018.

New: New or updated definitions in appendix E: Approaches (p. [164](#)), Direct education (p. [166](#)), EARS (p. [166](#)), Indirect education channel (p. [168](#)), Nonproject activities (p. [170](#)), Nutrition security (p. [170](#)), Outreach (p. [171](#)), Policy, systems and environmental change (p. [171](#)), Project (p. [172](#)), Project monitoring (p. [172](#)), and Social marketing campaign (p. [174](#)) **End of new materials.**

Summary of Regulations and Background

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

The Final Rule adopts the amended interim rule published April 5, 2013, to implement the SNAP Education (SNAP-Ed) provisions of the HHFKA. The rule also implements a provision of the Agricultural Act of 2014 to authorize physical activity promotion in addition to promotion of healthy food choices. Highlights include:

- State SNAP agencies, in consultation with local operators of other Federal and State programs must present a valid and data-driven needs assessment of nutrition, physical activity, and obesity prevention needs of the target population and their barriers to accessing healthy foods and physical activity in the State SNAP-Ed Plan. This helps to ensure SNAP-Ed activities complement the nutrition education and obesity prevention efforts of these programs.
- Under this rule, States must implement two or more of the following complementary approaches to deliver evidence-based nutrition education and

SNAP nutrition education and obesity prevention services per 7 CFR §272.2 (d)(2)(vii)(B), SNAP-Ed services are

“a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, demonstrated to facilitate adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low-income individuals eligible to receive benefits under SNAP or other means-tested programs and individuals residing in communities with a significant low-income population.”

Introduction

obesity prevention activities that are based on the most current Dietary Guidelines for Americans (DGA):

- individual or group-based nutrition education, health promotion, and intervention strategies.
 - comprehensive, multi-level interventions; and
 - community and public health approaches.
- The target audience for SNAP-Ed is defined as SNAP participants and low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs, such as Medicaid or Temporary Assistance for Needy Families (TANF), as well as individuals residing in communities with a significant low-income population.

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

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

Introduction

Determining SNAP-Ed State Allocations

The method for determining State SNAP-Ed allocations is based on State shares of SNAP-Ed expenditures in addition to State shares of SNAP participation. For FY 2018 and each year thereafter, the ratio of expenditures to participation is a 50/50 weighting of expenditures to participation. Estimated FY 2023 allocations to assist States in preparing their FY 2023 Plan budgets will be posted on the SNAP-Ed Connection website's [Funding Allocations](#) page, when available.

SNAP Promotion Rule and SNAP-Ed

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

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

Full text of the regulations and resources listed in this section are at:

- Food and Nutrition Act of 2008, as amended:
<https://www.govinfo.gov/content/pkg/COMPS-10331/pdf/COMPS-10331.pdf>
- Agriculture Improvement Act of 2018, Section 4019:
<https://www.congress.gov/bill/115th-congress/house-bill/2/text?format=txt>
- Healthy, Hunger-Free Kids Act of 2010 (HHFKA):
https://www.fns.usda.gov/sites/default/files/PL_111-296.pdf
- SNAP: Nutrition Education and Obesity Prevention Grant Program Final Rule:
<https://www.federalregister.gov/documents/2016/03/31/2016-07179/supplemental-nutrition-assistance-program-nutrition-education-and-obesity-prevention-grant-program>
- SNAP Promotion Final Rule:
<https://www.federalregister.gov/documents/2016/12/20/2016-30621/supplemental-nutrition-assistance-program-promotion>
- 2020-2025 Dietary Guidelines for Americans (DGA):
https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary_Guidelines_for_Americans_2020-2025.pdf

Section 1: Overview

Section 1: Overview

SNAP is the nation’s first line of defense against hunger and a powerful tool to improve nutrition among low-income people. A USDA study found that participating in SNAP for 6 months is associated with a significant decrease in food insecurity¹. An additional USDA study found that SNAP participants typically spend less on average on food than eligible non-participants and spend more of their food dollars on foods prepared at home². Further studies indicate that overall, there are no major differences between the types of foods purchased by SNAP-participating households and non-participating households³.

New: SNAP-Ed strengthens SNAP’s public health impact by addressing nutrition security to improve nutrition and prevent or reduce diet-related chronic disease and obesity among SNAP recipients. According to USDA, Nutrition Security is defined as the consistent access, availability, and affordability of foods and beverages that promote well-being and prevent (and if needed, treat) disease, particularly among racial/ethnic minority populations, populations living under the Federal poverty line, and rural and remote populations. **End of new material.**

SNAP-Ed is an important priority for the USDA FNS, and the Agency appreciates the leadership demonstrated by States towards this mutual commitment to improve the health of low-income families. The SNAP-Ed requirements mandated by the FNA under Section 28 complement and address the FNS mission and the goal and focus of SNAP-Ed. As part of the FNS mission, [“We work with partners to provide food and nutrition education to people in need in a way that inspires public confidence and supports American agriculture.”](#)

SNAP-Ed Goal

The SNAP-Ed goal is:

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

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

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

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

Section 1: Overview

SNAP-Ed Focus

The focus of SNAP-Ed is:

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

SNAP-Ed Guiding Principles

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

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

The **SNAP-Ed target audience** is **SNAP-Ed eligible individuals**, specifically SNAP participants and other low-income individuals who qualify to receive SNAP benefits or other means-tested Federal assistance programs. It also includes individuals residing in communities with a significant (50 percent or greater) low-income population.

The term “**means-tested Federal assistance programs**” for the purposes of this Guidance is defined as Federal programs that require the income and/or assets of an individual or family to be at or below 185 percent of the Federal Poverty Level (FPL) to qualify for benefits. There may be additional eligibility requirements to receive these programs, which provide cash and noncash assistance to eligible individuals and families.

New: Households certified for SNAP, including those in States with Broad-Based Categorical Eligibility (BBCE) policies with gross income limits up to 200% FPL, are SNAP participants and are therefore eligible for the same programs and services as all SNAP participants – including SNAP-Ed. SNAP-Ed eligibility limits should not exceed the State threshold for BBCE, as listed at <https://www.fns.usda.gov/snap/broad-based-categorical-eligibility>.

Temporary changes to college students’ eligibility for SNAP and expansion to the school lunch program, in response to the public health emergency, are discussed in more detail in Section 2, pages 48 to 50. **End of new materials.**

Section 1: Overview

The Six SNAP-Ed Guiding Principles:

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

REFER TO SECTION 2, WRITING YOUR STATE PLAN

2. SNAP-Ed must include nutrition education and obesity prevention services consisting of a combination of educational approaches. The Social-Ecological Model (SEM) illustrates how all sectors of society, including individuals and families, communities, and organizations; small and large businesses; and policymakers combine to shape an individual's food and physical activity choices.

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

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

Approach Three: Community and public health approaches to improve nutrition

3. The SEM (Figure 1), addresses how SNAP nutrition education and obesity prevention services can be provided to the low-income SNAP-Ed target audience through the three approaches described in the FNA.

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

REFER TO CHAPTER 4 OF THE DGA FOR MORE INFORMATION ABOUT HOW NUTRITION EDUCATION AND OBESITY PREVENTION ACTIVITIES CAN SUPPORT HEALTHY EATING AMONG ADULTS

Section 1: Overview

Figure 1. A Social-Ecological Model for Food and Physical Activity Decisions

A Social-Ecological Model for Food & Physical Activity Decisions

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



Section 1: Overview

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

[Refer to Guidelines for Developing the SNAP-Ed Plan section](#)

4. The Program must use evidence-based, behaviorally focused interventions and maximize its national impact by concentrating on a small set of key population outcomes supported by evidence-based multi-level interventions. Evidence-based interventions based on the best available information must be used. FNS encourages States to concentrate their SNAP-Ed efforts on the program's key behavioral outcomes.
5. The Program can maximize its reach when coordination and collaboration take place among a variety of stakeholders at the local, State, regional, and national levels through publicly or privately funded nutrition intervention, health promotion, or obesity prevention strategies. The likelihood of nutrition education and obesity prevention interventions successfully changing behaviors is increased when consistent and repeated messages are delivered through multiple channels.

[Refer to Coordination and Collaboration requirements section](#)

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

[Refer to SNAP-Ed Roles and Responsibilities](#)

An **evidence-based approach** for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available practice-based evidence. The SNAP-Ed **key behavioral outcomes** align with the DGA key recommendations, found at <https://www.dietaryguidelines.gov/>.

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

Section 1: Overview

Sources of Nutrition and Obesity Prevention Guidance

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

One of the four guidelines from the DGA is to follow a healthy eating pattern across the lifespan at an appropriate calorie level. Doing so helps to support a healthy body weight and reduce the risk of chronic disease. **FNS expects that healthy eating patterns, weight management, and obesity prevention for the low-income population will be key components of SNAP-Ed Plans** due to the focus on nutrition education and obesity prevention of the FNA under Section 28. States are strongly encouraged to use MyPlate, and related resources found at <https://www.myplate.gov/> to support their SNAP-Ed Plans.

CNPP's *Start Simple with MyPlate* campaign was developed to promote healthy eating and physical activity. "No matter your age, healthy eating is important. Small changes matter, so let's help Americans make every bite count. Start Simple with MyPlate today!"

- [Start Simple with MyPlate](#) provides tips and recipe ideas from the five MyPlate food groups (Fruits, Vegetables, Grains, Protein Foods, Dairy) that Americans can easily incorporate into their busy lives no matter their food preferences, cultural traditions, health status, or budget.
- **New:** Start by taking the [MyPlate Quiz](#) to see how your eating habits stack up against the MyPlate recommendations. Based on your answers you'll receive tailored resources, your results level, and a personal quiz results code to sync with the *Start Simple with MyPlate* app. The MyPlate Quiz is now available in Spanish.
- Download the [Start Simple with MyPlate app](#) to set daily, achievable goals to help you eat healthy throughout the day and week. Sync your results from the MyPlate Quiz



Start simple
with MyPlate

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for a personalized experience. Join challenges, see progress, and earn badges to celebrate successes.

- Use [Shop Simple with MyPlate](#) to save money while shopping for healthy food choices by finding savings in your local area and discovering new ways to prepare budget-friendly foods. In the “Savings” area of the tool, enter your zip code to find cost-saving opportunities in your local area, including stores and farmer’s markets that accept SNAP EBT and rewards programs (e.g., GUSNIP incentive programs). In the “Foods” section, get budget-friendly suggestions from each food group, and purchasing and storage tips, serving ideas, recipes, and nutrition information. **End of new material.**

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

- **Physical Activity Guidelines (PAG):** The PAG provide science-based information and guidance on the amounts and types of physical activities Americans 6 years and older need for health benefits. The PAG are intended for health professionals and policymakers and are accompanied by resources to help guide the physical activity of the general public. The DGA provides a key recommendation that encourages Americans to meet the Physical Activity Guidelines (PAG) at <https://health.gov/our-work/nutrition-physical-activity/physical-activity-guidelines/current-guidelines>
- **Healthy People 2030 (HP 2030) Plan:** These objectives are science-based, 10-year national objectives for improving the health of all Americans that include established benchmarks and the monitoring of progress over time. The Nutrition and Healthy Eating and Physical Activity objectives of HP 2030 with related data and information on interventions and resources can assist States in formulating objectives and selecting interventions in these areas. More information on HP 2030 may be obtained at <http://healthypeople.gov/>.
- **U.S. Food and Drug Administration Nutrition Facts Label and Menu Labeling: New:** The U.S. Food and Drug Administration’s public health education campaign “**The New Nutrition Facts Label: What’s in it for You?**” provides consumers, health educators, and other health professionals with key information about the updated label that is based on current scientific information, including the link between diet and chronic diseases. A portfolio of materials and videos are available to help raise awareness about the changes to the Nutrition Facts label, increase its use, and help consumers, health care professionals, and educators learn how to use it as a tool for maintaining healthy dietary practices. More information on the Nutrition Facts label may be found at <http://www.fda.gov/newnutritionfactslabel>.
- Menu Labeling requires calories to be listed on many menus and menu boards of restaurants and other food establishments that are part of a chain of 20 or more locations. In addition to calorie information, covered establishments are also

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required to provide written nutrition information such as saturated fat, sodium, and dietary fiber to consumers upon request. More information on Menu Labeling may be found at <http://www.fda.gov/caloriesonthemenu>. **End of new material.**

Approaches

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

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

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

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

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

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

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

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

- **New:** Conducting nutrition education based on the DGA 2020-2025 including:
 - Follow a healthy dietary pattern at every life stage

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- Customize and enjoy nutrient-dense food and beverage choices to reflect personal preferences, cultural traditions, and budgetary considerations.
- Focus on meeting food group needs with nutrient-dense foods and beverages and stay within calorie limits.
- Limit foods and beverages higher in added sugars, saturated fat, and sodium, and limit alcoholic beverages. **End of new material.**
- Conducting individual or group educational sessions on achieving and maintaining a healthy body weight based on the DGA. These sessions could include measuring height and weight or using self-reported heights and weight to determine body mass index (BMI).
- Integrating nutrition education into ongoing physical activity group interventions based on the Department of Health and Human Services (HHS) Physical Activity Guidelines.
- Implementing classes to build basic skills, such as cooking, menu planning, or food resource management.
- Sponsoring multi-component communication activities to reinforce education, such as interactive Web sites, social media, visual cues, and reminders like text messages. An example would be the Eating Smart Being Active curriculum at <https://snaped.fns.usda.gov/materials/eating-smart-being-active>.

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

Approach Two may address several or all elements of the SEM and may target the individual, the interpersonal (family, friends, etc.), organizational (workplace, school, etc.), community (food retailers, food deserts, etc.), and public policy or societal (local laws, social norms, etc.) levels. **A key tenet of multi-level interventions is that they reach the target audience at more than one level of the SEM and that the interventions mutually reinforce each other.** Multi-level interventions generally are thought of as having three or more levels of influence.

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

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

- Developing and implementing nutrition and physical activity policies at organizations with high proportions of people eligible for SNAP-Ed, such as work-sites that employ low-wage earners or eligible youth- and faith-based organizations.
- Collaborating with schools and other organizations to improve the school nutrition environment, including supporting and providing nutrition education classes as

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well as serving on school wellness committees. Local educational agencies (LEAs) are encouraged to include SNAP-Ed coordinators and educators on local school wellness policy committees (see [Partnering with School Wellness Programs in the Financial and Cost Policy Section and Other Federal Policies Relevant to the Administration of SNAP-Ed](#)).

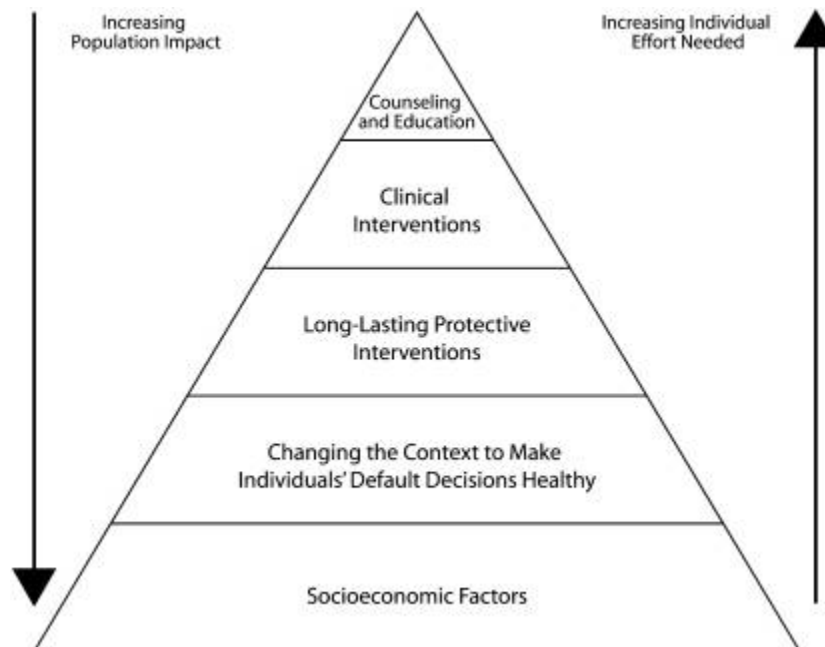
- Coordinating with outside groups to strategize how healthier foods may be offered at sites, such as emergency food distribution sites frequented by the target audience.
- Establishing community food gardens in low-income areas, such as public housing sites, eligible schools, and qualifying community sites, which will benefit at the individual, interpersonal and community levels.
- Providing consultation, technical assistance, and training to SNAP-authorized retailers in supermarkets, grocery stores, a local corner or country store to provide evidence-based, multi-component interventions. SNAP-Ed providers may work with key partners on strategic planning and provide assistance with marketing, merchandising, recipes, customer newsletters, and technical advice on product placement. The retailer could provide produce, healthy nutrition items, and point of sales space for a healthy checkout lane. For more information on how to develop, implement, and partner on food retail initiatives and activities see the Center for Disease Control and Prevention (CDC)'s Healthier Food Retail Action Guide at <http://www.cdc.gov/nccdphp/dnpao/state-local-programs/healthier-food-retail.html>. SNAP is mentioned as a potential partner in CDC's Guide.
- Working to bring farmers markets to low-income areas, such as advising an existing market on the process for obtaining Electronic Benefits Transfer (EBT) machines to accept SNAP benefits.
- Coordinating with WIC to promote and support breastfeeding activities.

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

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

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Figure 2. The Health Impact Pyramid



Source: Frieden TR. Framework for public health action: the health impact pyramid. *Am J Public Health* 2010;100:590–5. doi: [10.2105/AJPH.2009.185652](https://doi.org/10.2105/AJPH.2009.185652)

New: The Health Impact Pyramid (Figure 2) illustrates the relative population impact and individual effort needed for the five tiers of interventions: socioeconomic factors, changing the context to make individuals' default decisions healthy, long-lasting protective interventions, clinical interventions, and counseling and education. In this model, SNAP-Ed is providing nutrition education and intervention strategies to make healthy choice the easier choice for participants. SNAP-Ed also coordinates and collaborates with agencies and community partners that provide healthcare or address social determinants of health. **End of new material.** By focusing PSE efforts on neighborhoods, communities, and other jurisdictions (e.g., cities, towns, counties, districts, and Indian reservations with large numbers of low-income individuals), public health approaches aim to increase the health impact on the SNAP-Ed target audience. **As with Approach Two, PSE change efforts also may be conducted using community and public health approaches.**

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

- Working with local governments in developing policies to improve healthy food access in low-income areas.
- Collaborating with community groups and other organizations, such as Food or Nutrition Policy Councils, to improve food, nutrition, and physical activity environments to facilitate the adoption of healthier eating and physical activity behaviors among the low-income population.

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- Serving on other relevant nutrition- and/or physical activity-related State and local advisory panels, such as school wellness committees and State Nutrition Action Councils (SNAC).
- Delivering technical assistance to a local corner or convenience store to increase healthier offerings and purchases. Corner stores, often referred to as convenience stores, country stores, or bodegas, are small-scale stores that may have a more limited selection of food and other products. The Healthy Corner Stores Guide, which can be accessed at <https://snaped.fns.usda.gov/library/materials/healthy-corner-stores>, provides information, strategies, and resources for organizations interested in making healthy foods and beverages more available in corner stores within their communities. A Spanish language version is also available at the link above.
- Facilitating the reporting of statewide surveillance and survey data on nutrition indicators among the population that is eligible to receive SNAP benefits.
- Providing obesity prevention interventions at settings such as schools, childcare sites, community centers, places of worship, community gardens, farmers markets, food retail venues, or others with a low-income population of 50 percent or greater.
- Conducting social marketing programs targeted to SNAP-Ed eligible populations about the benefits of physical activity.
- Providing low-income individuals with nutrition information, such as shopping tips and recipes, in collaboration with other community groups who provide access to grocery stores through “supermarket shuttles” to retailers that have healthier options and lower prices than corner stores.
- Conducting health promotion efforts, such as promoting the use of a walking trail through a Safe Routes to Schools program or the selection of healthy foods from vending machines.
- Helping local workplaces establish policies for healthy food environments.
- Partnering with non-profits hospitals to coordinate their Internal Revenue Service (IRS)-mandated community benefits program with SNAP-Ed (see https://www.irs.gov/irb/2015-05_IRB for details)

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

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Social Marketing Programs

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

As described by CDC, social marketing is "the application of commercial marketing technologies to the analysis, planning, execution, and evaluation of programs designed to influence voluntary behavior of target audiences in order to improve their personal welfare and that of society."⁴

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

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

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

Reaching SNAP-Ed Eligible Audiences through Social Marketing

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

- Mass media (e.g., television, radio, newspapers, billboards, and other outdoor advertising)
- Social media (e.g., social networks, blogs, and user-generated content)

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

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- Earned media (e.g., public service announcements, letters to the editor, opinion editorials, and press conferences)
- Peer-to-peer popular opinion leaders (e.g., youth or parent ambassadors, local champions, celebrity spokespersons, and faith leaders)
- Promotional media (e.g., point-of-purchase prompts, videos, Web sites, newsletters, posters, kiosks, brochures, and educational incentive items)

Successful SNAP-Ed social marketing programs should be comprehensive in scope using multiple communication channels to reach target audiences with sufficient frequency and reach. Market research and formative evaluation can help identify communication channels and nutrition-and health-information seeking behaviors that will best reach different segments of the SNAP-Ed eligible audience. Examples of market research tools that can help identify audience segment characteristics include:

- CDC's *AUDIENCE INSIGHTS* at <http://www.cdc.gov/healthcommunication/Audience/index.html>
- National Cancer Institute's *HEALTH INFORMATION NATIONAL TRENDS SURVEY* at <http://hints.cancer.gov/>
- Pew Research Center's *INTERNET, SCIENCE, AND TECH* at <http://www.pewinternet.org/>

Policy, Systems, and Environmental Change Interventions

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

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

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

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Policy

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

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

Systems

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

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

Environment

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

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

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Taken together, education, marketing, and PSE changes are more effective than any of these strategies alone for improving health and preventing obesity. This is done by combining reinforcing educational, PSE, and marketing strategies used in SNAP-Ed or conducted by partners such as other FNS or CDC programs.

SNAP-Ed should be seen as a consultant and technical advisor for creating PSE changes that benefit low-income households and communities, rather than the provider of services. SNAP-Ed aids organizations so that they can adopt, maintain, and enforce PSE changes themselves without continuous involvement from SNAP-Ed. This likely will also facilitate sustainable PSE changes as organizations take ownership of the PSE change.

SNAP-Ed programs should work closely with communities and partners to develop PSE changes that are useful and relevant to SNAP-Ed participants, and feasible for PSE activity partners to sustain. Although FNS recognizes that SNAP-Ed resources may be needed on an ongoing basis to support changes as partner organizations build capacity, the organization that receives the consultation and technical assistance is ultimately responsible for adopting, maintaining, and enforcing the PSE change. If a partner organization is not able to sustain PSE changes, this may indicate that the change is not realistic or relevant to community needs.

PSE changes should reflect input from partner organizations and community members served by the organizations. This is indicative of the concept that “no service system can be effective or sustained unless it is grounded in, reflective of, and has the full participation of the community it is designed to serve.”⁵

SNAP-Ed programs may consult and provide technical assistance on PSE changes that support healthy eating and physical activity without taking on or supplanting the responsibilities of Federal, State, and local program operators. For example, as requirements of the HHFKA are implemented in childcare and school settings (<https://www.fns.usda.gov/cn>), SNAP-Ed can build on and complement required changes in menu standards, competitive foods, training, and school wellness policies. Examples of successful SNAP-Ed partnerships implementing PSE changes can be found at <https://snaped.fns.usda.gov/success-stories>.

Evidence-based Approach to SNAP-Ed:

As a reminder, an evidence-based approach for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available practice-based evidence.

⁵ Franz, J. (2008). Planning for and implementing system change using the wraparound process. In E.J. Bruns & J.S.Walker (Eds.), *The resource guide to wraparound*. Portland, OR: National Wraparound Initiative, Research, and Training Center for Family Support and Children’s Mental Health. [https://nwi.pdx.edu/NWI-book/Chapters/Franz-5b-\(system-change\).pdf](https://nwi.pdx.edu/NWI-book/Chapters/Franz-5b-(system-change).pdf)

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FOR RESOURCES THAT ASSIST IN IDENTIFYING WHAT CONSTITUTES AN EVIDENCE-BASED INTERVENTION OR APPROACH, PLEASE REFER TO [Appendix B. Checklist for Evidence-Based Approaches](#).

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

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

Evidence-Based Approach Expectations

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

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

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Finding Evidence-based Materials

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

THE SNAP-ED STRATEGIES AND INTERVENTIONS: AN OBESITY PREVENTION TOOLKIT FOR STATES, which is also known as the SNAP-Ed Toolkit, features evidence-based policy, systems, and environmental changes that support education and social marketing and provides ways to evaluate interventions across various settings. It was developed by the National Collaborative on Childhood Obesity Research (NCCOR) at the request of FNS. Updates to the toolkit will continue to add strategies and interventions that are being used successfully to address nutrition security in communities across the nation. The current interactive SNAP-Ed Toolkit can be found at <https://snapedtoolkit.org/>. The toolkit is not an exhaustive compilation of potential strategies and interventions that are appropriate for SNAP-Ed. Rather, FNS is offering the toolkit as a starting point for ideas that States may use to further their obesity prevention and nutrition security efforts through SNAP-Ed.

Evaluating your Evidence-Based Intervention

When existing, validated evaluation tools or instruments are not available for an intervention, the State or Implementing Agencies may need to adapt existing tools or develop new tools. When developing new tools or adapting existing tools for your target audience, follow the established protocols for instrument development. The process for developing reliable and valid evaluation instruments/tools is provided Chapter 4 of the FNS publication “Addressing the Challenges of Conducting Effective SNAP-Ed Evaluations: A Step-by-Step Guide”⁶.

It is recommended that Implementing Agencies discuss evaluation tool adaptation or development ideas with their State Agency. State Agency staff should discuss with their SNAP-Ed Regional Coordinator to ensure there are no duplications of effort within your State, region or across regions. Please note that evaluations should focus on specific, current SNAP-Ed interventions or initiatives in your State’s SNAP-Ed Plan. Lastly, before modifying any existing evaluation tool(s), contact the specific developer(s) to obtain permission, and to gain insight into whether modifications would affect the validity of the evaluation tool.

⁶ Cates, S., Blitstein, J., Hershey, J., Kosa, K., Flicker, L., Morgan, K. and Bell, L. Addressing the Challenges of Conducting Effective Supplemental Nutrition Assistance Program Education (SNAP-Ed) Evaluations: A Step-by-Step Guide. Prepared by Altarum Institute and RTI International for the U.S. Department of Agriculture, Food and Nutrition Service, March 2014.

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SNAP-Ed Evaluation Framework Priority Indicators

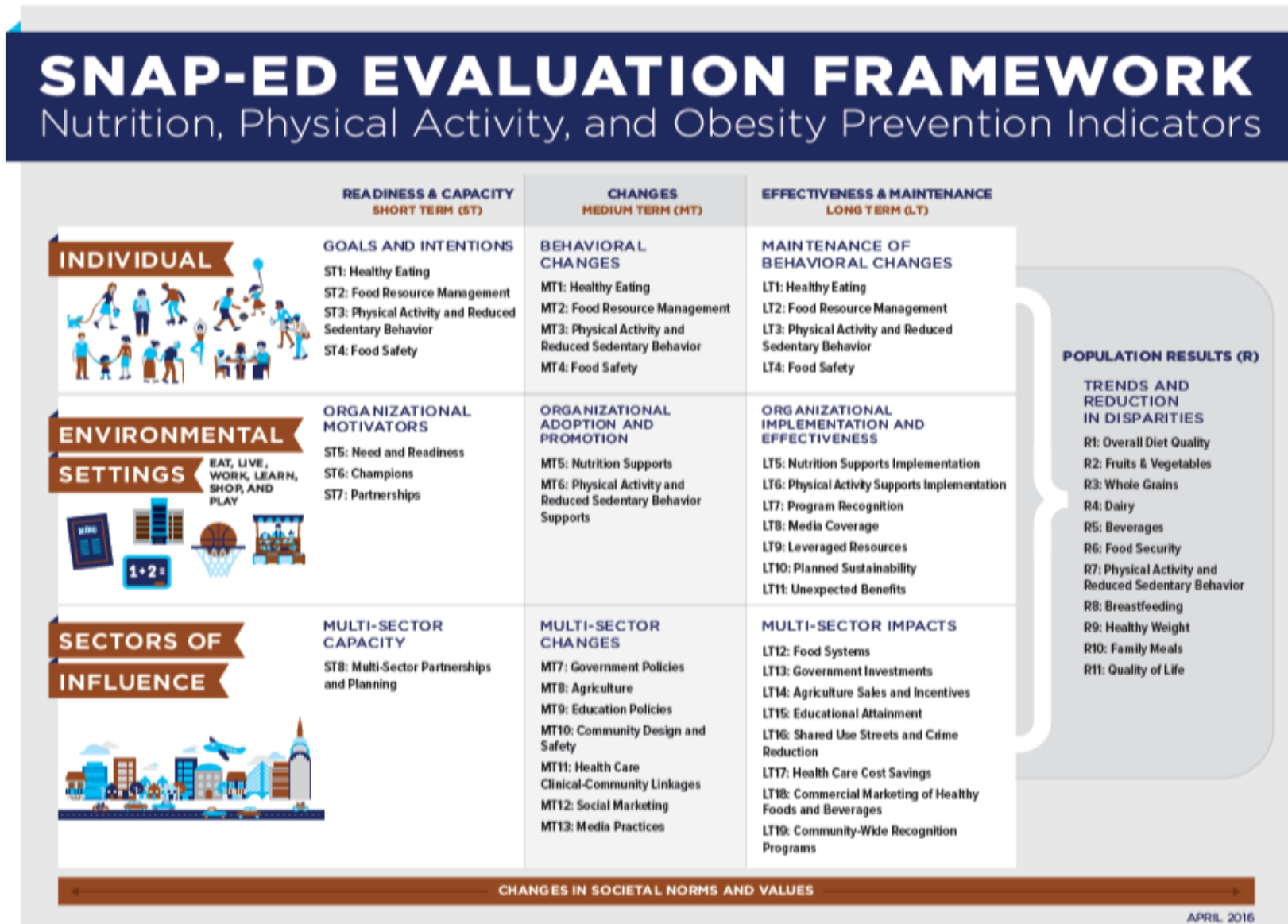
The FNS *SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EDUCATION (SNAP-Ed) EVALUATION FRAMEWORK: NUTRITION, PHYSICAL ACTIVITY, AND OBESITY PREVENTION INDICATORS* (Evaluation Framework, Figure 3) was released in 2013 by the USDA/FNS Western Regional Office, updated in 2014, and finalized with experts and stakeholders' input at the national level in 2016. The Evaluation Framework includes a focused menu of 51 evaluation indicators that align with SNAP-Ed guiding principles. The indicators lend support to documenting changes resulting from multiple approaches for nutrition education and obesity prevention targeted to a low-income audience. A summary graphic of the Evaluation Framework is available on the following page. The interactive SNAP-Ed Evaluation Framework provides more details on evaluation indicators and measurement tools at <https://snapedtoolkit.org/framework/index/>.

States are strongly encouraged to use the SNAP-Ed Evaluation Framework: indicators and report their State outcomes for the seven SNAP-Ed priority indicators. The SNAP-Ed priority indicators are listed below.

- **Medium-Term (MT) 1:** Healthy Eating Behaviors
- **MT2:** Food Resource Management
- **MT3:** Physical Activity and Reduced Sedentary Behaviors
- **MT5:** Nutrition Supports Adopted in Environmental Settings
- **Short-Term (ST) 7:** Organizational Partnerships
- **ST8:** Multi-sector partnerships and planning
- **Population Results (R) 2:** Fruits and Vegetables

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Figure 3. SNAP-Ed Evaluation Framework.



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Types of Evaluation

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

- **Formative Evaluation** provides information that is used during the development of an intervention. It may be used to determine if a target audience understands the nutrition messages or to test the feasibility of implementing a previously developed intervention in a new setting. Formative research results are used to shape the features of the intervention itself prior to implementation.
- **Process Evaluation** systematically describes how an intervention looks in operation or actual practice. It includes a description of the context in which the program was conducted such as its participants, setting, materials, activities, duration, etc. Process assessments are used to determine if an intervention was implemented as intended. This checks for fidelity, that is, if an evidence-based intervention is delivered as designed and likely to yield the expected outcomes.
- **Outcome Evaluation** addresses the question of whether or not anticipated group changes or differences occur in conjunction with an intervention. Measuring shifts in a target group's nutrition knowledge before and after an intervention is an example of outcome evaluation. Such research indicates the degree to which the intended outcomes occur among the target population. It does not provide definitive evidence, however, that the observed outcomes are due to the intervention.
- **Impact Evaluation** allows one to conclude authoritatively, whether or not the observed outcomes are a result of the intervention. In order to draw cause and effect conclusions, impact evaluations incorporate research methods that eliminate alternative explanations. This requires comparing those (e.g., persons, classrooms, communities) who receive the intervention to those who either receive no treatment or an alternative intervention. The strongest impact evaluation randomly assigns the unit of study to treatment and control conditions, but other quasi-experimental research designs are sometimes the only alternative available.

Comprehensive SNAP-Ed Projects and Plans

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

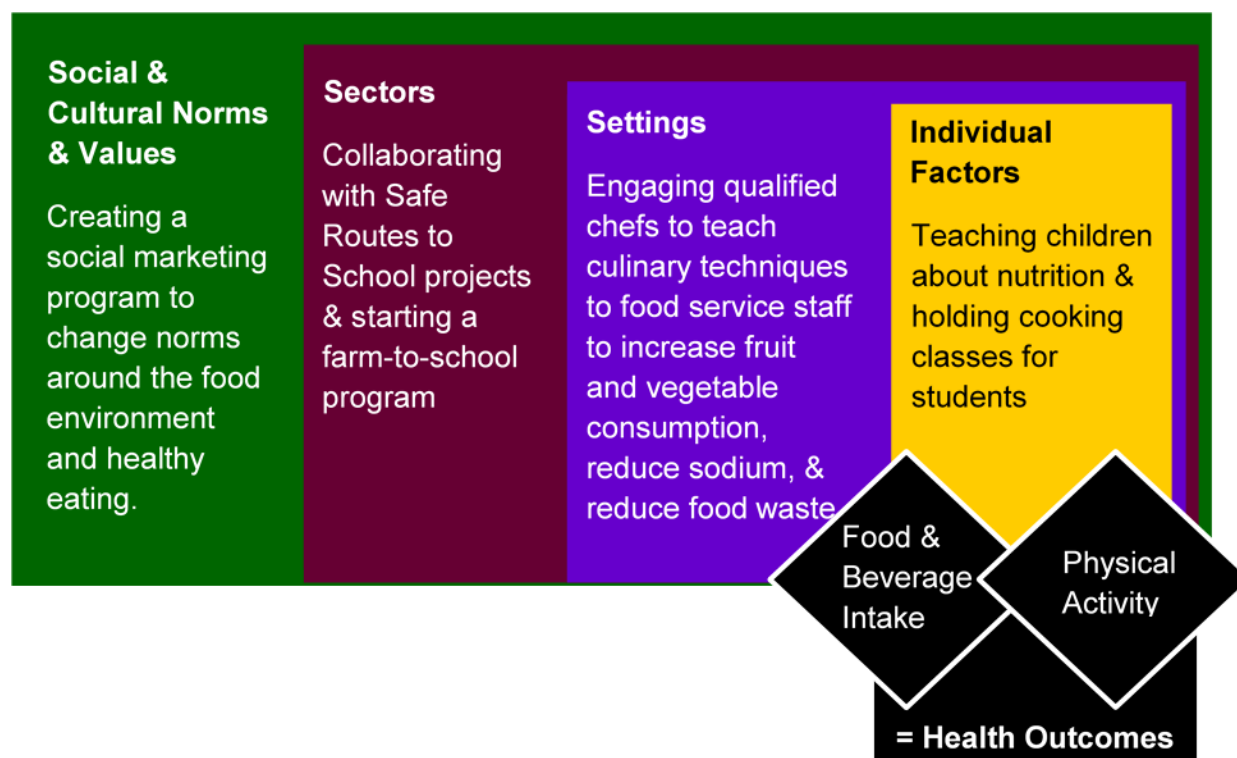
States have opportunities to include a vast array of interventions into comprehensive SNAP-Ed Plans by using the definitions of nutrition education and obesity prevention services and an evidence-based approach, and by using the three approaches identified to deliver nutrition education and obesity prevention interventions described in the FNA. These interventions must comply with the [SNAP-Ed Financial and Cost](#)

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[Policy](#) detailed in [SECTION 3](#), including policy on allowable costs and reasonable and necessary expenditures. For example, while building walking trails in a low-income community would promote physical activity for the SNAP-Ed target audience, this activity would not be an allowable cost since capital expenditures are not permitted. Helping partner groups organize and plan walking trails may be an allowable SNAP-Ed expense. Promoting the walking trail and the benefits of physical activity to address weight management are SNAP-Ed allowable costs and in accordance with the SNAP-Ed goals and principles.

Employing multiple approaches has been shown to be more effective than implementing any one approach. An example of implementing activities from all three approaches including social marketing and PSE change efforts in schools with a majority low-income population could include several of the components described in Figure 4.

Figure 4. Example of implementing activities from all three approaches.



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

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

Coordination and Collaboration Requirements

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

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

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

Data Exchange Guidance

7 CFR §272.1(c)(1), provides the limited circumstances where State Agencies may disclose information obtained from SNAP applicant or recipient households. These provisions permit the disclosure of this information to those directly connected with the administration of SNAP, including SNAP-Ed.

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

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

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

Data exchange examples

Use of participant data for program evaluation

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

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

Contract language for exchange of data

Rhode Island Department of Human Services entered into a contract with Brown University's Rhode Island Innovative Policy Lab to provide contact data, including full name, address, phone number, and email address for SNAP clients, for a pilot survey of food insecurity across the State. A contract was developed and clearly described the

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data to be used, how it would be used, along with a Mitigation Plan. The Mitigation Plan defined what conditions would constitute a data breach and the steps to be taken if such a breach of SNAP participant PII data occurred, as well as who would be responsible for each of these steps. Mitigation Plan steps included lead time for notification and initiation of an investigation of a suspected breach, procedure for outside allegations of a breach, agencies for cooperation, Corrective Action Plan activities, and destruction of participant data. Liabilities were also described. This agreement was approved and signed prior to any exchange of participant data.

Multi-State SNAP-Ed Partnerships Guidance

SNAP-Ed funds may be used to collaborate with other State SNAP-Ed Agencies and Implementing Agencies to leverage resources to deliver education programming or enhance policy, system, and environmental changes to promote healthy eating and active lifestyles. This type of partnership may be beneficial in providing SNAP-Ed services to ITOs, hard-to-reach rural locations, and communities in interstate border areas.

States/Implementing Agencies must have signed MOUs on file detailing each type of contribution from each entity. Details such as funding amounts, responsibilities of each entity, activities, types and methods of evaluation, and timelines should be included.

This type of multi-state partnership should be included in the State SNAP-Ed plan of each entity in the collaboration.

Opportunities for Collaboration with SNAP-Ed

Non-profit Hospitals

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

State Nutrition Action Councils (SNAC)

About 15 years ago, SNAC were established in FNS Regions to maximize nutrition education efforts and improve coordination and cooperation among the State agencies, FNS nutrition assistance programs, public health agencies, and EFNEP. SNAC are now primarily comprised of representatives from FNS programs who develop statewide nutrition education plans across programs. The plans focus on one or more common goals, promote collaboration, and use integrated approaches to connect effort and resources.

A number of States still effectively operate SNAC or similarly named groups today. SNAC can serve as a model for coalescing State programs around nutrition education and obesity prevention efforts. Several States have established SNAP-Ed Advisory

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Committees that include representatives from the FNS nutrition assistance programs but have the SNAP State agency taking the lead role. FNS encourages States to engage in these types of collaborative efforts.

In FY 2016, each FNS Regional Office was charged with establishing a new SNAC (or similar council) in one State with a high obesity rate, as defined by the CDC, to align nutrition and obesity prevention activities across programs. **New:** In FY 2022, FNS Regional Offices were tasked to establish SNACs or similar councils to focus on improving food security. **End of new material.**

Some of these statewide coalitions seek to expand the stakeholders to include interested public, private, and non-profit groups and programs to develop State Nutrition and Food Systems Plans. These plans identify State priorities to combat food insecurity, diet-related disease, and obesity that can help serve as a needs assessment for State SNAP-Ed Plans.

It is appropriate for SNAP-Ed to devote staff time to help fund these pilots and subsequent efforts in the pilot. These groups are encouraged to use the SNAP-Ed Evaluation Framework as a tool to help plan and evaluate SNAC and State level partnerships. States may learn more about initiating and sustaining these types of collaborative efforts by consulting with their FNS Regional SNAP-Ed Coordinators.

New: The Public Health Institute Center for Wellness and Nutrition developed the *STATE NUTRITION ACTION COUNCIL (SNAC) TOOLKIT* to guide SNAC through the process of establishing partnerships to successfully implement obesity prevention initiatives and improve the health of the most at-risk communities.

<https://centerforwellnessandnutrition.org/wp-content/uploads/2018/12/SNAC-Toolkit-Final.pdf> **End of new material.**

Related State and Federally Funded Programs

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

Indian Tribal Organizations

Food Distribution Program on Indian Reservations (FDPIR) provides USDA Foods to income-eligible households living on Indian reservations, and Native American households residing in approved areas near reservations or in Oklahoma. USDA distributes food and administrative funds to participating Indian Tribal Organizations (ITOs) and State agencies to operate FDPIR. Many households participate in FDPIR as an alternative to SNAP because they do not have easy access to SNAP offices or authorized food stores; however, FDPIR participants are considered eligible to receive SNAP-Ed.

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FNS encourages States to collaborate with FDPIR program operators and nutritionists to conduct nutrition education and explore opportunities to increase nutrition education funding and resources to provide the greatest benefit to FDPIR participants. FNS provides nutrition resources to promote and help FDPIR participants make the most of USDA Foods including Product Information Sheets for each USDA food item and an FDPIR Sharing Gallery. To learn more about FDPIR, please visit: <https://www.fns.usda.gov/fdpir/food-distribution-program-indian-reservations>.

To access the FDPIR Foods Available List, please visit: <https://fns-prod.azureedge.us/sites/default/files/resource-files/FDPIR%20FAL%20FY22.pdf>

To access USDA Foods Product Information Sheets, with storage, preparation tips, nutrition information and recipes, please visit: <https://www.fns.usda.gov/usda-foods/household-product-information-sheets-and-recipes>

To access nutrition education materials, recipes, photos, videos, tip sheets and more on the FDPIR Sharing Gallery, please visit: <https://www.fns.usda.gov/fdpir/fdpir-sharing-gallery>

The Commodity Supplemental Food Program (CSFP) works to meet the unique nutritional needs of low-income older adults at least 60 years of age by supplementing their diets with a monthly package of health, nutritious USDA Foods. USDA distributes food and administrative funds to participating States and Indian Tribal Organizations (ITOs). States, ITOs and local agencies determine eligibility of applicants, distribute food, and provide nutrition education. Recipients of this program may be eligible and receive referrals for other nutrition and healthcare assistance programs such as to SNAP, Medicaid, and Medicare.

FNS encourages States to collaborate with CSFP local agencies and ITOs to conduct and evaluate nutrition education activities and explore opportunities to increase nutrition education funding and resources to provide the greatest benefit to low-income older adults. FNS provides information about nutrition including resources to help promote and make the most of CSFP USDA Foods via Product Information Sheets for each USDA food item and a CSFP Sharing Gallery. To learn more about CSFP, please visit: <https://www.fns.usda.gov/csfp/commodity-supplemental-food-program>.

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

FNS reminds States of this requirement as it relates to SNAP-Ed. The consultations must pertain to the unique needs of the members of Tribes. A directory of Tribal Leaders, including contact information, can be found at <https://www.bia.gov/tribal-leaders-directory>. This page also contains an interactive map that allows you to learn more about the Federally recognized Tribes in your State.

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FNS also expects States to consider the needs of Tribal populations in conducting their needs assessments for SNAP-Ed and to consult and coordinate with State and local operators of FDPIR. FNS encourages States to ensure they make every effort to include a focus and devotion of resources to Tribal nutrition education.

States are encouraged to seek out FDPIR programs to help foster relationships at the Tribal level with SNAP-Ed, as well as local health departments, university extension programs, and other organizations experience in working with Tribes to help with on-site nutrition education implementation, especially organizations that may be submitting proposals to the State to receive SNAP-Ed funding. **States are expected to provide technical information and training on how Tribes can best submit such a proposal.**

SNAP-Ed State agencies must explicitly describe how they have consulted with Indian Tribal Organizations in their annual SNAP-Ed plans. FNS SNAP-Ed Regional Coordinators are unable to approve SNAP-Ed plans that do not include the following:

- Name of the Indian Tribal Organization
- Name(s) and title(s) of the individual(s) contacted
- Brief description of the outcome of the consultation and how it will impact the SNAP-Ed plan.

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

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

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- Staff working with Tribal community volunteers to plant a kitchen garden at an FDPIR program site

CDC-Funded Grant Programs

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

Title V MCH Services Block Grant to the States Program

New: FNS recommends that State agencies explore ways to collaborate with the Health Resources and Services Administration’s (HRSA) Title V Maternal and Child Health (MCH) Services Block Grant to the State’s program on nutrition and obesity prevention efforts. Title V is a key source of support for promoting and improving the health and well-being of the nation’s mothers, children, including children with special needs, and their families through supporting the MCH public health system to assure access to quality health care. Two key performance measures for the Title V Block Grant focus on breastfeeding and physical activity. Utilizing evidence-based or – informed strategies, 42 States have selected to address breastfeeding, while 20 States have chosen to work on ways to improve physical activity among children and adolescents. SNAP-Ed providers could potentially partner with State Title V programs on these nutrition and physical activity initiatives. Additional information from HRSA about the Title V MCH Services Block Grant program is available at <https://mchb.hrsa.gov/maternal-child-health-initiatives/title-v-maternal-and-child-health-services-block-grant-program>

MCH Nutrition Training Program

FNS recommends that State agencies explore opportunities for collaboration and technical assistance with HRSA’s MCH Nutrition Training Programs. The MCH Nutrition Training Program establishes nutrition centers of excellence to improve access to comprehensive, community-based, nutrition-centered, and culturally competent coordinated care. The program provides interdisciplinary graduate education and training with a public health focus and provides continuing education and technical assistance to local, State, and national organizations while working in collaboration with State Title V and other MCH programs. Additional information is available at: <https://mchb.hrsa.gov/training/projects.asp?program=12> **End of new material.**

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Collective Impact

States may wish to consider other promising solutions to organize around delivering and achieving their program objectives. A promising approach to increase effectiveness is to move from an isolated impact approach to a collective impact approach.

Collective impact is fundamentally different in that it offers more discipline, structure, and higher-performing approaches to large-scale social impact than other types of collaboration. In partnerships, providing backbone support may be a powerful way for SNAP-Ed providers to achieve nutrition education and obesity prevention objectives. Likewise, SNAP-Ed providers may find that participating in such collective efforts best suits their programs.

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

Although not a direct part of the SNAP-Ed Plan or Annual Report, the information about MEs can assist in the development of SNAP-Ed Plans to remind States of the documentation they must be able to provide during an on-site review.

Selection of SNAP-Ed projects for on-site ME reviews should be based on one or more of the following factors:

- Amount of expenditures over the past fiscal year relative to other States in the region with similar population demographics and program scope;
- Quality of sample documentation used by the State agency to support payment from the State agency to subcontractors;
- Known or suspected difficulties in program administration or operation; and
- Length of time since the State's SNAP-Ed services were last examined.

This review will assess whether:

- The State agency has a process in place to review and monitor grantees' and sub-grantees' program operations.

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

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

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

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

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- Operations are consistent with the terms of the approved Plan.
- Activities are targeted to participating and potentially eligible SNAP clients.
- Nutrition education and obesity prevention activities are being evaluated for effectiveness.
- The State is examining and documenting the progress being made toward reaching the Plan goals.
- Administrative expenses are reasonable, necessary, and properly documented and allocated.
- States are submitting developed materials for sharing on the SNAP-Ed Connection Web site.
- States are adhering to Civil Rights and Equal Employment Opportunity (EEO) requirements.

SNAP-Ed Roles and Responsibilities

FNS, USDA:

- Establishes SNAP-Ed policy and develops related guidelines and procedures, intervention programs, and activities that address the highest priority nutrition problems and needs of the target audiences.
- Allocates to State SNAP agencies 100 percent funding for allowable, reasonable, and necessary SNAP-Ed costs.
- Reviews and approves State SNAP-Ed Plans.
- Monitors State SNAP-Ed projects.
- Leads the coordination of nutrition education and obesity prevention efforts at the national and regional levels, including partnerships with other Federal agencies, appropriate national organizations, and other public and private entities to address national priorities.
- Promotes and supports collaboration across programs and planning at State and local levels to ensure implementation of consistent and effective interventions.
- Consults with the Director of the CDC as well as outside experts and stakeholders.
- Aligns SNAP-Ed messages with all other FNS nutrition assistance program messages.

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- Provides technical assistance to program providers at all levels, including linking staff with appropriate resources, and identify partnership opportunities at the State and regional levels.
- Develops and provides nutrition education and PSE materials for use with the SNAP-Ed target audience.
- Oversees the collection and analysis of national SNAP-Ed data.
- Incorporates the current DGA and the related USDA Food Guidance System into FNS nutrition assistance programs.
- Promotes evidence-based decisions through technical assistance, standards for research, and support for sound and systematic evaluation.

State SNAP Agency:

- Works collaboratively across State agencies, especially those administering other FNS Programs and with other appropriate agencies to promote healthy eating and active living among the SNAP-Ed target population.
- **Develops a coordinated, cohesive State SNAP-Ed Plan based on a State-specific needs assessment of diet-related disease and addresses national and State priorities while linking SNAP-Ed to SNAP benefits.**
- Provides leadership, direction, and information to implementing agencies and entities contracted to provide SNAP-Ed services to ensure that SNAP-Ed appropriately serves the SNAP-Ed audience and is consistent with SNAP-Ed policies.
- Submits a unified State SNAP-Ed Plan to FNS and provides assurances that Plan activities comply with SNAP-Ed policies.
- **Submits a coordinated, cohesive annual SNAP-Ed performance report to FNS each year.**
- **Monitors implementation of the State's approved SNAP-Ed Plan, including allowable expenditures.** State SNAP agencies must monitor performance of implementing agencies which, at a minimum, includes a review of financial integrity to ensure:
 - Proper documentation and identification of costs.
 - Proper allocation of costs.
 - Account for any program income.
 - Appropriate time and effort documents are kept.
 - FNS also encourages State agencies to participate in observations of nutrition education activities to ensure activities are delivered in accordance with the SNAP-Ed Guidance and efforts are targeted toward SNAP-Ed eligible audiences. It is recommended that observations be conducted annually. The review of financial integrity and observation of

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nutrition education activities may be completed as part of the State Management Evaluation (ME) process.

- **New:** Offers training and information to State/local human services office staff or SNAP case workers, so that they can notify SNAP participants and applicants of the availability of SNAP-Ed programs and services. **End of new material.**
- Provides budget information to FNS as required.
- Collects and reports data regarding participation in SNAP-Ed and characteristics of those served.

SNAP-Ed Implementing Agency / Local Provider:

- Works with State SNAP agency, other FNS programs, and other SNAP-Ed providers within the State to develop a single comprehensive State SNAP-Ed Plan. The Plan addresses State-specific SNAP-Ed population needs as well as national/State priorities and includes sound evaluation strategies.
- Works with other State and local agencies and with private agencies to promote healthy eating and active living among the SNAP-Ed population.
- Coordinates and collaborates with other State and local nutrition education and obesity prevention programs, especially those recognized by or receiving support from CDC.
- Implements evidence-based nutrition education and obesity prevention efforts as specified in the approved State SNAP-Ed Plan.
- Helps the SNAP-Ed audience understand how to eat a healthy diet on a limited food budget using SNAP benefits and managing their food resources.
- Uses appropriate evidence-based PSE strategies and interventions to reach the SNAP-Ed population.
- Collects and reports data to the State SNAP agency regarding participation in SNAP-Ed and characteristics of those served.
- Submits required reports according to timelines established by the State SNAP agency.
- Works with the State SNAP agency to provide information to State/local office human services staff, so that they can notify SNAP participants and applicants of the availability of SNAP-Ed programs and services.
- Builds relationships with other local service providers (WIC, local health departments, childcare, school meals programs, etc.) so referrals of SNAP participants to other nutrition and health-related services can be made as appropriate.

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

Local SNAP Office:

- Informs SNAP participants and applicants of opportunities to participate in SNAP services, including SNAP-Ed.
- Builds relationships with other local service providers (WIC, local health departments, and school meals programs) so referrals of SNAP participants to other nutrition and health-related services can be made as appropriate.
- As space and resources allow, makes SNAP-Ed information and services available in the SNAP office.
- Coordinates opportunities between SNAP and SNAP-Ed efforts, as appropriate and available.
- Participates in worksite wellness activities or community-based wellness programs, as appropriate and available.

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

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

SNAP-Ed Plan and Annual Report Requirements

To request SNAP-Ed grant funds, State agencies must submit a SNAP-Ed Plan to FNS for approval. In accordance with 7 CFR 272.2(d)(2), SNAP-Ed Plans must:

- Conform to standards established in regulations, SNAP-Ed Plan Guidance, and other FNS policy. A State agency may propose to implement an annual or multi-year Plan of up to 3 years.
- Include a table of contents and executive summary.
- Identify the methods the State will use to notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities. As an example, States may inform potential SNAP-Ed participants through linkages and referrals with facilities and programs that serve the low-income population, such as county offices, food banks, public housing, or public assistance offices, etc. Agencies may also provide information on bulletin boards or through electronic media.
- Describe methods the State agency will use to identify its target audience. States may propose State-specific targeting strategies and supporting data sources.
- Include an assessment of the nutrition, physical activity, and obesity prevention needs of the target population in addition to barriers to accessing healthy foods and physical activity. State agencies should make certain that the needs assessment considers the diverse characteristics of the target population.
- Ensure interventions are comprehensive in scope and appropriate for communities and the eligible population. The interventions must recognize the population's constrained resources and potential eligibility for Federal food assistance.
- Describe the evidence-based nutrition education and obesity prevention services it will provide and how the State will implement those services, either directly or through agreements with other State or local agencies or community organizations.
- Show how the interventions and strategies meet the assessed nutrition, physical activity, and obesity prevention needs of the target population

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

- Include activities that promote healthy food and physical activity choices based on the most recent [DGA](#).
- Include evidence-based activities using two or more [SNAP-Ed approaches](#), including individual or group-based direct nutrition education, health promotion, and intervention strategies with one or more additional approaches.
- Provide a description of the State's efforts to consult and coordinate activities with publicly or privately funded national, State, and local nutrition education and health promotion initiatives and interventions, including WIC, the CNPs, FDPIR, and EFNEP. States must consult and coordinate with State and local operators of other FNS programs. The State must describe the relationship between the State agency and coordinating organization(s).
- Present an operating budget for the Federal fiscal year with an estimate of the cost of operation for one year for an annual Plan. An updated budget should also be submitted annually for multi-year Plans. As part of the budget process, inform FNS by the end of the first quarter of each Federal fiscal year (December 31) of the amount of its prior year allocation that it cannot or does not plan to obligate for SNAP-Ed activities by the end of the Federal fiscal year.
- Provide additional information as may be required about the nutrition education and obesity prevention strategies and interventions selected along with characteristics of the target population served. This will depend on the content of the State's SNAP-Ed Plan and is necessary to determine whether nutrition education and obesity prevention goals are being met.
- State agencies must also submit a SNAP-Ed Annual Report to FNS by January 31 of each year. The Report must describe SNAP-Ed Plan project activities, outcomes, and budget for the prior year.

State Agency Liability

For SNAP

State SNAP agencies must submit a SNAP-Ed Plan by August 15 for approval. Plans may be submitted earlier to facilitate the review and approval process to assure continuity of program efforts. FNS has 30 days to approve, deny, or request additional information. If additional information is requested, the State agency must provide this expeditiously for FNS's approval within 30 days after receiving the request. FNS notifies the State agency of the Plan approval or denial and the authorized allocation amount after which funds are put in the Letter of Credit for the State agency to draw down to pay the Federal administrative costs.

SNAP regulations at 7 CFR 272.2(b) and 272.2(e)(7) require States to actively engage in Tribal consultations about the SNAP State Plan of Operations, which includes the SNAP-Ed State Plan. The consultations must pertain to the unique needs of the members of Tribes.

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

For SNAP-Ed

The State SNAP agency is accountable for the contents and implementation of its approved SNAP-Ed Plan. It is responsible for making allowable cost determinations and monitoring to ensure that SNAP-Ed operators spend funds appropriately. The State SNAP agency is fully liable for repayment of Federal funds should those costs be determined unallowable. State agencies shall provide program oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts.

FNS Regional Office financial management and program staff are available to provide technical and other assistance to State agencies in developing Plans. The State SNAP agency is responsible for providing technical assistance to any sub-grantees to ensure that all projects support the State's SNAP-Ed goals and objectives and to clarify which expenses are eligible for reimbursement through SNAP.

Record Retention Requirements and Management

According to 7 CFR 272.1 (f) SNAP regulations require that all records be retained for 3 years from fiscal closure. This requirement applies to fiscal records, reports and client information held by the SNAP State agency and all sub-grantees. Supporting documentation may be kept at the sub-grantee level but shall be available for review for 3 years from the date of quarterly claim submittal. Any costs that cannot be substantiated by source documents will be disallowed as charges to SNAP.

Timeline for Plan and Annual Report Submission and Approval

Date	Action
January 31	Due date for Annual Report for previous fiscal year. New: FNS is expected to implement a new electronic reporting system for FY 2023 annual reporting and beyond, which will replace the current EARS and the Annual Narrative Report, and due as one report by January 31, 2024. End of new material.
April 1-August 15	Plan submission period for the coming fiscal year
May 1	Last date for receipt of Plan Amendments for current year
August 15	Due date for receipt of annual Plans or updates to multi-year Plans for the coming fiscal year
October 1	Approval date or Regional Office response to States on Plan
December 31	Provide status of prior year allocation
December 31	New: Due date for submission of EARS data in the Food Program Reporting System (FPRS) online through FY 2022 only. End of new material.

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

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

SNAP-Ed plans and annual reports must be consistent with the mission and focus of FNS, key behavioral outcomes, and the coordination and collaboration policy detailed in the [Overview](#) Section of this Guidance. State agencies are expected to:

- Submit one single SNAP-Ed Plan and annual report per State that will incorporate all SNAP-Ed implementing agencies and local providers that participate.
- The Plan must describe the identified health-related nutrition and physical activity needs of the SNAP-Ed population in the State, and the SNAP-Ed goals and objectives for the State.
- Provide project-specific information as instructed in this Guidance, including information on how projects support State goals and objectives and descriptions of project implementation, staffing, and budget for each project.
- Provide clear and concise descriptions and justifications for requested items.
- Use the modules recommended in this Guidance.
- Concisely describe activities considering the scope of projects and limit the length of the Plan.
- Complete a careful review of the Plan by the State agency program staff and fiscal officer to assure that the Plan is consistent with the current Guidance and budgetary information is accurate.
- Verify that the State SNAP-Ed Nutrition Coordinator or State SNAP Director and a State SNAP agency fiscal reviewer have approved, signed, and dated the Plan.
- Submit the Plan to the respective FNS Regional Office by the August 15 due date.
- Submit Plan Amendments for current year with new or significantly revised activities to the FNS Regional Office by May 1.
- Concisely describe the outcomes of projects, including evaluation findings where indicated, and submit the previous year's annual report to the FNS Regional Office by January 31.

The Plan should be submitted electronically to the Regional SNAP-Ed Coordinator. States must include changes to their State Plans as requested by FNS and resubmit the electronically to FNS before final approval is granted.

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

Annual or Multi-Year Plans

New: State agencies must conduct comprehensive needs assessments that cover a three-year period and set State priority goals and objectives to correspond with the three-year needs assessment cycle. Projects, nonproject activities, evaluation, and coordination and collaboration, however, may be planned annually or on a multi-year basis.

Multi-year Plans may cover a two- or three-year period and include all the projects and nonproject activities to be conducted during that period. FNS recommends that States develop multi-year SNAP-Ed Plans when their planned nutrition education and obesity prevention activities employ a variety of approaches and incorporate PSE change interventions. States may find that planning, implementing, evaluating, and demonstrating progress on these interventions is better reflected over time using a multi-year Plan. Note that all State agencies must submit a budget annually, regardless of the number of years covered by other parts of the Plan. **End of new material.**

When considering the approval of a State's multi-year Plan, FNS will factor in the State agency's:

- inclusion of a limited number of clear, concise, and well-written target population health-related nutrition and physical activity objectives;
- record of fiscal and program integrity;
- demonstration of a high degree of program stability resulting from experienced staff, consistent and reliable partners, and prior demonstration of proven projects; and
- projections indicating the State's estimated future funding can support program activities over the course of a multi-year Plan.

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

Annual Progression to SNAP-Ed Plans

New: State priority goals are established every three years as a part of the comprehensive needs assessment. In the second and third years of this cycle, the SNAP-Ed Plan, whether single or multi-year, must demonstrate a progression and/or flow of program activities in a logical and sequential manner with each year building upon the preceding one. For example, year one can be conducting a needs assessment and performing baseline programming and/or piloting; year two can be program implementation and evaluation; and year three can be a continuation of program expansion and further evaluation.

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The following chart expands on what is required in the SNAP-Ed Plan for each year of the needs assessment cycle.

Plan Module	Year 1	Years 2 and 3
1: Identify the Target Audiences and Their Needs <ul style="list-style-type: none"> Needs assessment State priority goals 	Required	Updates (if applicable)
2: State SNAP-Ed Action Plan <ul style="list-style-type: none"> Objectives Performance indicators Projects SMART Nonproject activities SNAP-Ed Outreach Action plan overview 	Required	SMART objective and performance indicator updates (if applicable) Project, nonproject activity, outreach, and action plan overview updates (if applicable) The action plan overview should describe progress made in the last year and how the current Plan builds upon that progress.
3: Planned Projects	Required	Required. May be updated from the previous year if a project is continuing.
4: Planned Evaluations	Required	Required. May be updated from the previous year if an evaluation is continuing.
5: Coordination and Collaboration	Required	Required
6: Planned Staffing and Budget	Required	Required
7: Assurances and Signatures	Required	Required End of new material

Plan Amendments

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

- The State SNAP-Ed program budget exceeds \$100,000 and there is a change in activities that results in a change of 5 percent or greater of the total program budget.
- An implementing agency SNAP-Ed program budget exceeds \$100,000 and there is a change in activities that results in a change of 5 percent or greater of the total program budget. This includes State reallocations of funds among

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implementing agencies and implementing agency reallocation of funds among subcontractors.

- Budget revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs.

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

In amendments, States should indicate whether the request is for a new or revised project and whether funds will come from unobligated previous FY funds (carry-over) or from a project activity that has been revised. States should provide a full description of the new or revised activities, providing similar information as for a new project. Submit amendments electronically to the FNS Regional Office.

New: Each SNAP-Ed Plan module **section** and **subsection** is discussed below along with **key content**. To the extent possible, external resources are identified in bullet form with live links; these resources and links can also be found on the SNAP-Ed Connection (<https://snaped.fns.usda.gov/>). There are no significant substantive changes to the information collected in the following Plan Modules and Report Modules. However, the format has changed; and some instructions have been expanded to provide clarity and facilitate consistent reporting. Therefore, all Plan and Report Modules should be viewed as new materials. **End of new material.**

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Plan Module 1: Identify the Target Audiences and Their Needs

New: States should deliver SNAP-Ed in a way that maximizes the numbers of the SNAP target audience reached and the potential for behavior change among them. State agencies are required to conduct a comprehensive needs assessment every 3 years. The needs assessment should drive State priority goals, objectives, performance indicators, and SNAP-Ed projects and their target audiences. As such, it must identify the target audiences' needs as well as the strengths and weaknesses of current SNAP-Ed programming in meeting those needs.

Needs assessment findings also provide a benchmark for State and implementing agencies to use in assessing the progress that they have achieved each year. All State agencies should update the needs assessment annually when significant new information becomes available which might warrant modifications of priority goals and objectives.

The Needs Assessment must:

- Be a purposeful, strategic, and data-driven process led by the State agency with the active engagement of its implementing agencies and other stakeholders to identify the SNAP-Ed target audiences and understand their needs;
- Present the nutrition, physical activity, and obesity prevention needs of the target population as well as their barriers to accessing healthy foods, physical activity, and SNAP-Ed programming;
- Consider the diverse characteristics of the target population, including race/ethnicity, language, and other factors;
- Consider the needs of Tribal populations and make efforts to include a focus and devotion of resources to Tribal nutrition education;
- Capture information on whether services are already being delivered to the target audience;
- Present areas for improvement with regards to:
 - SNAP-Ed access and appropriateness for the target audiences;
 - collaborations and partnerships with other agencies and organizations including USDA nutrition programs, Minority Serving Institutions, Indian Tribal Organizations, and organizations from multiple sectors that work with or can impact nutrition and physical activity opportunities for the SNAP-Ed target population;
 - capacity of the SNAP-Ed workforce to deliver programming that addresses the needs and characteristics of its diverse target audiences;
- Describe the program's assets and challenges in having desired impacts.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

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Needs Assessment Process

The SNAP-Ed needs assessment is led by the State SNAP agency and utilize an inclusive and collaborative process that engages diverse stakeholders including implementing agencies, partner entities, Minority-Serving Institutions (MSIs) and other minority-serving organizations, Indian Tribal Organizations, and, to the extent feasible, SNAP-Ed eligible individuals.

In the Plan, State agencies must concisely describe how these groups were engaged to provide input into the needs assessment and/or review and contextualize the results of the needs assessment. They should also describe the process used to apply the needs assessments findings to determine the State's priority goals, develop objectives, and select indicators to track progress.

Needs Assessment Findings

The Needs Assessment findings must integrate data collected outside of SNAP-Ed (e.g., State and national health surveys, health and nutrition needs assessments completed by other agencies in the State), SNAP-Ed Annual Report data, SNAP-Ed program evaluations, and other qualitative and quantitative data collected by SNAP-Ed that can help to identify assets and needs (e.g., focus groups, key informant interviews, community listening sessions, surveys).

To provide this information, **agencies must first review existing information.** Organizational partners and State and local agencies should be considered as a source of relevant data. Many conduct their own needs assessments (e.g., State Health Improvement Plans, hospital community health needs assessments) that provide information that may be useful for SNAP-Ed needs assessments. Data collected as a part of SNAP-Ed projects on SNAP-Ed participants is also an important source of information that may be used to describe the target audience. Other sources of data that may be valuable for SNAP-Ed needs assessments include:

- State WIC program data
- Behavioral Risk Factor Surveillance System (<http://www.cdc.gov/brfss>)
- National Survey of Children's Health (<http://www.childhealthdata.org/learn/NSCH>)
- Youth Risk Behavior Surveillance System (<https://www.cdc.gov/healthyyouth/data/yrbs/index.htm>)
- America's Health Rankings (<https://www.americashealthrankings.org/>)
- State Department of Health data, including State Health Improvement Plan needs assessments

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- USDA Economic Research Service data products (<https://www.ers.usda.gov/data-products/>)
 - Food Consumption Estimates (<https://www.ers.usda.gov/data-products/food-consumption-and-nutrient-intakes/>)
 - American Time Use Survey Eating and Health Module (<https://www.ers.usda.gov/data-products/eating-and-health-module-atus/>)
 - Current Population Survey, Food Security Supplement (<https://www.ers.usda.gov/data-products/food-security-in-the-united-states/>)
- State of Childhood Obesity (<https://www.stateofchildhoodobesity.org/data/>)
- Community Commons Maps and Data (<https://www.communitycommons.org/collections/Maps-and-Data>)
- CDC obesity data and related information (<https://www.cdc.gov/obesity/data/childhood.html>, <https://www.cdc.gov/healthyschools/index.htm>)
- CDC State Indicator Reports, strategies, data, fact sheets, social media tools, and resources on physical activity (<http://www.cdc.gov/physicalactivity/resources/reports.html>)
- County Health Rankings (<https://www.countyhealthrankings.org/>)
- PolicyMap (<https://www.policymap.com/maps>)
- CARES HQ (<https://careshq.org/map-room/>)
- HealthLandscape (<https://healthlandscape.org/>)
- The UDS Mapper (<http://www.udsmapper.org/>)⁷
- SNAP-Ed Engagement Network (<https://snaped.engagementnetwork.org/>)

More general nutrition/food resources from CDC are available at <http://www.cdc.gov/nutrition/resources-publications/index.html>.

Agencies can collect new data selectively if there are significant gaps in the available information. States may develop an objective related to improved needs assessment and propose new (primary) data collection (e.g., focus groups, surveys, and key informant interviews) as a *nonproject activity* in [Plan module 2: State SNAP-Ed Action Plan](#). Plans should describe the questions to be answered in any new data collection and the steps proposed to answer them.

⁷ The UDS Mapper is a comprehensive tool that can be daunting as it contains a lot of data. The Mapper has sliders for threshold levels of interest (i.e., percent of population at or below 100 percent FPL). Unfortunately, there is no pre-set slider for 185 percent. The Mapper is free but requires registration.

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State-Specific Nutrition and Physical Activity-Related Data on Target Population

State agencies are expected to provide information on the nutrition/physical activity, behavioral, and lifestyle characteristics of the State population. These statistics can help to identify the behaviors and health conditions to be addressed by SNAP-Ed programming. Agencies are welcome to include other statistics to enhance their ability to develop, target, and deliver appropriate nutrition education and obesity prevention services (e.g., dietary and food purchasing attitudes and habits; social and cultural values and norms).

Avoid providing similar or duplicative information about the target audiences from different data sources (e.g., obesity rates for a particular age group measured by different surveys). If more than one source is available, State agencies should focus on State-level statistics using the most recent data for Plan module 1.

When possible, State agencies should use the same data source as has been used in previous SNAP-Ed Plans to identify trends more readily. If data are available for populations that overlap (e.g., children 2 – 5, children 2 – 18), both may be reported if they illustrate unique needs related to nutrition, physical activity, and health outcomes. State agencies are not expected to combine or reconcile information across data sources.

Agencies may include statistics on subpopulations that directly inform their goals, objectives, projects, and/or nonproject activities. For instance, local or Tribal nation obesity rates may be uploaded separately to justify programming in a specific location or with a specific target audience.

Community Food Access Data

Upload a table or State-level map describing community food access. The following data sources may be useful for describing food access:

- USDA ERS Food Access Research Atlas and the Food Environment Atlas (<https://www.ers.usda.gov/data-products/food-access-research-atlas/>)
- PolicyMap (<https://www.policymap.com/maps>)
- CARES HQ (<https://careshq.org/map-room/>)

Demographic Characteristics of the SNAP-Ed Target Audience

SNAP-Ed Target Audience

Individuals readily identifiable as members of the target audience include persons referred by the local SNAP office; persons reached through direct marketing to SNAP participants; parents ineligible for SNAP who receive SNAP benefits on behalf of their children; and SNAP participants in a SNAP Job Readiness Training Program. Members of Indian Tribal Organizations participating in FDPIR also are eligible for SNAP-Ed. See [SNAP-ED TARGET AUDIENCE text box](#) and [Coordination and Collaboration Requirements Subsection in Section 1](#).

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Income: Households certified for SNAP, including those in States with Broad-Based Categorical Eligibility (BBCE) policies with gross income limits up to 200% FPL are SNAP participants and are therefore eligible to the same programs and services as all SNAP participants – including SNAP-Ed. SNAP-Ed eligibility limits should not exceed the State threshold for BBCE, as listed at <https://www.fns.usda.gov/snap/broad-based-categorical-eligibility>.

Persons eligible for other means-tested Federal assistance programs such as Supplemental Security Income (SSI), the WIC Program, or TANF. Persons typically not eligible for SNAP, such as incarcerated persons, residents of nursing homes, boarders, or college/university students, are ineligible for SNAP-Ed.

While most able-bodied students ages 18 through 49 who are enrolled in college or other institutions of higher education at least half time are not eligible for SNAP and therefore not eligible to receive SNAP-Ed, a student may be able to get SNAP benefits and participate in SNAP-Ed if otherwise income eligible and he/she:

- Gets public assistance benefits under a Title IV-A program of the Social Security Act
- Takes part in a State or Federally financed work study program.
- Works at least 20 hours a week.
- Takes care of a dependent household member under the age of 6.
- Takes care of a dependent household member over the age of 5 but under 12 and does not have adequate childcare to enable him/her to attend school and work a minimum of 20 hours, or to take part in a State or Federally financed work study program.
- Is assigned to or placed in a college or a certain other school through:
 - A program under the Workforce Innovation and Opportunity Act of 2014.
 - A program under Section 236 of the Trade Act of 1974.
 - An employment and training program under the Food Stamp Act.
 - An employment and training program operated by a State or local government.
- Is a single parent enrolled full time in college and taking care of a dependent household member under the age of 12?

Additional college students are now temporarily eligible under the exemptions created by the Consolidated Appropriations Act, 2021 (CAA). The CAA, created two new temporary exemptions for college students, which expand SNAP eligibility to students who:

- Are eligible to participate in a State or Federally financed work study program during the regular school year, as determined by the institution of higher education; or

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- Have an expected family contribution (EFC) of \$0 in the current academic year.

These students must still meet all other SNAP financial and non-financial eligibility criteria to be eligible for SNAP. The temporary student exemptions remain effective until the first recertification of a household beginning no earlier than 30 days after the COVID-19 public health emergency is lifted.

SNAP-Ed providers can address low-income students' nutrition and food access needs by partnering with campus-based food pantries or social service providers. These interventions can include providing technical assistance and educational resources on healthy donation and nutrient dense food selections to site partners, and in-person or virtual mini lessons with cooking demonstrations utilizing pantry items or on food resource management.

For additional information, please refer to:

SNAP Student Provisions in the Consolidated Appropriations Act 2021 - Questions and Answers | USDA-FNS <https://www.fns.usda.gov/snap/student-provisions-consolidated-appropriations-act-2021-qars>

SNAP Student Eligibility | USDA-FNS <https://www.fns.usda.gov/snap/students>

Qualifying Locations: Persons at qualifying locations that serve low-income individuals are part of the SNAP-Ed target audience. Information on the location of food banks, food pantries, soup kitchens, public housing, SNAP/TANF job readiness program sites, and other such sites may be included to identify where the target audiences live, work, shop, play, eat, and learn. Persons at other qualifying venues are also part of the SNAP-Ed target audience.

To qualify, it must be documented that the location/venue serves generally low-income persons where at least 50 percent of persons have gross incomes at or below 185 percent of poverty guidelines/thresholds. This would include, for example, residents, schools, or childcare centers located in census tract areas or other defined areas where at least 50 percent of persons have gross incomes that are equal to or less than 185 percent of the poverty threshold or children in schools where at least 50 percent of children receive free and reduced priced meals.

As part of the COVID-19 pandemic response, FNS has expanded eligibility for free meals to students at all participating schools for the duration of this emergency. When the school meals program is no longer means tested, SNAP-Ed providers must use different targeting methods to identify low-income schools and ensure they are serving the target low-income population.

Retail Locations Serving Low-Income Populations: Persons shopping in food retailers serving low-income populations are part of the SNAP-Ed target audience. Retail locations must accept WIC and/or SNAP benefits to qualify as a site for SNAP-Ed activities. Although many retailers accept these benefits, States should only approve SNAP-Ed activities in locations which demonstrate significant patronage by low-income individuals and families. Stores located in census tracts where at least 50 percent of

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persons have gross incomes that are equal to or less than 185 percent of the poverty threshold may qualify as SNAP-Ed activity sites.

FNS recognizes that SNAP recipients do not necessarily shop at the stores that are closest to where they live.⁸ Census tracts in some cases may not be the right measure. For example, in rural areas a particular store may be serving much of the SNAP low-income population or be the only grocery outlet in the community for the entire population, including the low-income population.

State and implementing agencies should seek input from low-income individuals and families, and organizations that regularly serve low-income individuals and families, to understand the SNAP and/or WIC retailers that are preferred by low-income members of the community. States may submit proposals to their respective Regional Office with alternate methods for defining grocery stores that serve the low-income target population as potentially eligible for SNAP-Ed.

Demographic Characteristics

Provide data on the race, ethnicity, tribal status, age, primary language, and geographic location (county, parish, or ward) of the [SNAP-Ed target audience](#). Note that 185 percent of the Federal poverty guidelines (or your State's SNAP gross income limit, if higher) may be used as a proxy for the SNAP-Ed-eligible population.

Other population characteristics and demographic data that may help in planning and delivering SNAP-Ed effectively can be provided, including SNAP participation rates; income-relevant census tract information; poverty rates; geographic areas or neighborhoods serving qualifying schools; location of public housing; gender, family composition, and education; and where and how the SNAP-Ed population eats, engages in physical activity, redeems SNAP benefits, lives, learns, works, and plays.

The following data sources may be useful for describing the SNAP-Ed target audience:

- The Bureau of Census data (<https://data.census.gov/cedsci/>)
- State demographic surveys

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

Geographic Information System (GIS) Mapping: In rural or frontier areas, urban residential areas that are economically intermixed, and in certain island States and

⁸ Ver Ploeg, Michele, Lisa Mancino, Jessica E. Todd, Dawn Marie Clay, and Benjamin Scharadin. Where Do Americans Usually Shop for Food and How Do They Travel To Get There? Initial Findings From the National Household Food Acquisition and Purchase Survey, EIB-138, U.S. Department of Agriculture, Economic Research Service, March 2015.

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territories, there may be few or no census tracts with more than half of residents within 185% of the Federal Poverty Level (FPL). States have used GIS mapping to identify census designated places (CDPs), which are concentrations of a population that are recognized by name but are not legally incorporated as cities, towns, or other jurisdictions as defined by the State. One State compared the low-income population in the 10 largest CDPs to the overall State population to identify which CDPs have the greatest percentage of low-income residents for SNAP-Ed programming. SNAP-Ed agencies may find the following mapping tools useful:

- **Capacity Builder:** The Capacity Builder allows users (i.e., FNS staff, State agencies, and partners) to identify areas of need using the percentage of Free and Reduced Price (F/RP) children eligible under the School Meals Program in each census block group. Need can also be assessed by the total number of eligible children in a block group, which can also help to estimate the number of meals needed in each area. Finally, certain traditionally underserved areas can be identified such, as Strikeforce counties, Tribal lands, and land on or near military bases. Once need is assessed, potential partners and site locations can be identified. Users can add information like public and private schools, universities, school districts, Rural Development and HUD housing, libraries, and churches. <https://www.hudexchange.info/resources/>
- **Community Commons:** Community Commons brings together a network of partners who have developed and made publicly available a variety of data and mapping tools among other resources. <http://www.communitycommons.org/>

Community Eligibility Provision (CEP): The CEP provides an alternative to household applications for free and reduced-price meals in local educational agencies (LEAs) and schools in high poverty areas. These schools and communities would be eligible for SNAP-Ed. SNAP-Ed providers implementing this targeting strategy should consider the resource and staffing limitations inherent in providing SNAP-Ed at all eligible schools. To be eligible, LEAs and/or schools must meet a minimum level (40 percent) of identified students for free meals in the year prior to implementing the CEP; agree to serve free lunches and breakfasts to all students; not collect free and reduced-price applications from households in participating schools; and agree to cover with non-Federal funds any costs of providing free meals to all students above amounts provided in Federal assistance.

- Each year, a list of all schools and LEAs eligible for CEP are listed in the Community Eligibility (CEP) database at <https://frac.org/community-eligibility-database/>.

Worksite Wellness Initiatives: To deliver worksite wellness programs, SNAP-Ed providers can work with Human Resource (HR) staff to ensure that 50 percent of the employees at the worksite are at or below 185 percent FPL.

One State used data from the American Community Survey and Bureau of Labor Statistics to determine an hourly wage that would equate to no more than 185 percent FPL for an average SNAP household with at least one member who earns income.

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

- The Bureau of Labor Statistics maintains a website with mean and median wages for different occupations at https://www.bls.gov/oes/current/oes_nat.htm. States can use this website to identify which types of occupations would most likely fulfill SNAP-Ed eligibility requirements.

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

Pro-Rating Expenses for Events with Mixed-Income Audiences: Certain events, such as a State or County Fair, may not be located in low-income areas but have the potential to reach many SNAP-Ed participants and other low-income persons. A State submitted a plan for a pro-rata share of SNAP-Ed funds to pay for the specific costs that would benefit the SNAP-Ed eligible population at the event. FNS calculated a weighted average of the percentage of residents in three target neighborhoods within 185 percent of the FPL, or the gross income required to confer SNAP eligibility.

SNAP Participation

Provide the number of SNAP households in each county, parish, or ward in the State using the most recent SNAP State agency data. SNAP participants are a key part of the target audience for SNAP-Ed. While the SNAP-Ed eligible population include people who are not SNAP participants, examining SNAP participation data helps to further describe where the SNAP-Ed eligible population resides. These local data matched or mapped with SNAP-Ed reach data may help to identify localities where SNAP-Ed is serving high need populations and those where there is particular need for expanded SNAP-Ed reach (see the Plan module 1 subsection on [Gaps in geographic reach of SNAP-Ed and related programs for the target audiences](#)).

Program Access and Appropriateness for Diverse Target Audiences

SNAP-Ed access is defined as SNAP-Ed eligible individuals being able to participate in appropriate SNAP-Ed interventions with reasonable effort. Access therefore includes the physical location of the SNAP-Ed interventions (i.e., programming is offered where the target audiences live, work, shop, play, eat, and learn). It also includes the extent to which the interventions are appropriate. SNAP-Ed appropriateness is defined as an

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intervention meeting the needs of the target audience. Appropriateness includes, but is not limited to:

- Mode of delivery (e.g., online interventions are not appropriate for audiences with limited broadband access, in-person interventions may not be appropriate for people with limited access to transportation)
- Accommodations for people with disabilities
- Languages offered
- Target audience culture
- Time of delivery (e.g., direct education interventions designed for working parents are offered outside of working hours)
- Implementing agency and staff (i.e., implemented by an organization and staff trusted within the target audience community)

State agencies must describe access to and appropriateness of past interventions and make plans to address identified gaps. In their descriptions, State agencies should cite recent SNAP-Ed program data and quantitative and qualitative information collected from partners and SNAP-Ed eligible individuals.

Gaps in geographic reach of SNAP-Ed and related programs for the target audiences

Begin by identifying the availability of other nutrition and/or physical activity programs, services, and social marketing campaigns that target low-income populations in the State. Examples include WIC, Team Nutrition, CNP, FDPIR, EFNEP, food banks, public health services, and obesity prevention programs funded by governmental organizations, such as the CDC or privately funded groups such as the Robert Wood Johnson Foundation. Having information about the work of others that serve a similar population may help to identify potential partners for collaboration and avoid duplication of existing services.

Then, use the most recent Annual Report to identify the places where SNAP-Ed programming has been offered. Compare the locations of SNAP-Ed and other programming to the places with the most SNAP-Ed eligible people and SNAP participants identified through the needs assessment in Plan module 1.

Next, list the areas of your State that have a significant number of SNAP-Ed-eligible individuals but little or no current programming from SNAP-Ed or other nutrition programs. Describe these areas. For example, consider whether they are rural, frontier, suburban, or urban; Tribal communities; or communities with many non-English-speaking groups. Maps may be used to illustrate program availability.

Last, describe factors that limit the geographic reach of SNAP-Ed programming (e.g., lack of implementing agencies serving a location) and the State and implementing

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agency's plans for addressing those gaps (e.g., developing partnerships with new implementing agencies).

Other factors affecting program access for diverse target audiences

Describe how SNAP-Ed programming is reaching all groups within its target audiences. To identify reach among these groups, compare the characteristics of direct education participants from the most recent Annual Report to the characteristics of SNAP-Ed eligible individuals identified in the [Needs Assessment Findings](#) in Plan module 1 and consider: what groups among the target audience are most and least likely to be reached by SNAP-Ed direct education?

State agencies may do additional analyses on Annual Report reach data. For instance, while demographic characteristics of individuals reached by a social marketing campaign or PSE interventions may not be measured, agencies could use Census Bureau data to describe the demographic characteristics of the SNAP-Ed eligible population living in the areas covered. This analysis could help to better understand the segments of the SNAP-Ed eligible population in the State that are least and most likely to be reached by SNAP-Ed.

Use the findings on the groups most and least likely to be reached to consider the barriers and facilitators to SNAP-Ed access. To describe those barriers and facilitators, the State agency are strongly encouraged to obtain input in a structured manner from implementing agencies, community-based partner organizations, SNAP-Ed participants, and SNAP-Ed eligible non-participants (e.g., key informant interviews, focus groups, community listening sessions). Last, describe how the State agency and implementing agencies will address factors limiting program access.

Program appropriateness for diverse target audiences

State agencies must describe the strengths and weakness of SNAP-Ed programming in its appropriateness for diverse target audiences. This part of the needs assessment draws directly from a statutory mandate in Farm Bill statute (Section (c)(2)(B)(ii)), which specifies that the SNAP-Ed Plan should “ensure that the interventions are appropriate for eligible individuals.”

To describe the strengths and weakness of SNAP-Ed programming appropriateness, the State agency should strongly consider obtaining input in a structured manner from SNAP-Ed participants and SNAP-Ed eligible non-participants. This input should focus on the SNAP-Ed programming's strengths or assets and weaknesses related to how well the program's service delivery methods, messages, and other attributes are tailored to support the behavioral change and policy, systems, and environmental change needs of diverse segments of the SNAP-Ed target audience. State agencies must also explain how the State agency and implementing agencies will address factors limiting program appropriateness.

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Coordination and Partnerships With Programs and Organizations From Multiple Sectors

Review the collaboration, coordination, and partnerships described in the most recent SNAP-Ed Annual Report. Consider the programs, multisector partnerships and coalitions, Indian tribal organizations, and minority-serving institutions with which SNAP-Ed coordinated. Then, describe the strengths and areas for improvement in coordination and partnerships.

Agency/Workforce Capacity

Describe the strengths and needs of the SNAP-Ed workforce at the State and implementing agency levels. Agencies may use methods such as surveys or qualitative methods to obtain input from their staff and from SNAP-Ed participants for this part of the needs assessment. State agencies will need to identify strengths and weaknesses or gaps at the State and implementing agency levels. State agencies should also identify resources and steps to strengthen workforce capacity (e.g., staff training, hiring).

- State and implementing agencies may consider using the Society for Nutrition Education and Behavior (SNEB) Nutrition Educator Competencies (<https://www.sneb.org/nutrition-educator-competencies/>) to assess strengths and weaknesses of their nutrition educators.
- Nutrition educators can enhance their nutrition knowledge and teaching skills by completing the National Nutrition Certification Program, a free online learning and certification program available through Utah State University Extension's SNAP-Ed program. (<https://community-nutrition-education.extension.org/national-nutrition-certification-program/>).

Selected State Priority Goals Based on Needs Assessment

State agencies must identify State priority goals that will drive the objectives and projects and other activities to be conducted. Five to seven priorities goals are recommended for each State SNAP-Ed Plan. These priority goals should arise directly from the needs assessment findings, reflecting the most important areas for SNAP-Ed programmatic efforts over the next 3 years and illustrating the overall purpose of SNAP-Ed.

Most goals should be population-based and health-related, focusing on nutrition and physical activity needs of the target population. Goals can focus on specific subpopulations, including expanding program reach to underserved high need populations and improving outcomes at the individual, organization, or community levels. At least one goal is expected to focus on improving program access or appropriateness. States are also encouraged to include at least one priority goal related to (a) expanding or strengthening partnerships and collaborations with other organizations and sectors or (b) strengthening SNAP-Ed workforce capacity.

Goals may be revised on an annual basis to reflect new needs identified from needs assessment updates.

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Plan Module 2: State SNAP-Ed Action Plan

State agencies complete this module to show how the priority goals identified in [Plan Module 1 – Identify the Target Audience and Their Needs](#) based on the needs assessment align with the objectives set to accomplish the goals, performance indicators used to measure progress, and projects and nonproject activities planned to achieve the objectives. FNS encourages States to select 5 to 7 priority goals and create at least one SMART objective for each goal. A well-written and clearly defined SMART objective is:

- **Specific:** Identifies a specific event or action that will take place
- **Measurable:** Quantifies the amount of change to be achieved
- **Appropriate:** Logical and relates to the State's SNAP-Ed goals
- **Realistic:** Practical, given available resources and proposed SNAP-Ed activities
- **Time-specific:** Specifies a time by which the objective will be achieved within the fiscal year(s) of the Plan

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

SMART objectives should be designed to be accomplished within the 3-year needs assessment cycle. A single objective may describe something to be accomplished over the course of two to three years, or they may be written in one-year segments, with each year building upon the previous one. For example:

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

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

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

State agencies must **identify performance indicators to track progress on all objectives from the [SNAP-Ed Evaluation Framework](#)**. For the example objective on establishing collaborative relationships with food banks, “ST7: Organizational

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Partnerships” from the SNAP-Ed Evaluation Framework provides possible performance indicator measurements, such as ST7c (description of partnership accomplishments and lessons learned).

[All SNAP-Ed projects](#) and [Nonproject Activities](#) must be designed to accomplish one or more objectives. In the Annual Report, agencies are required to list the SNAP-Ed Evaluation Framework indicator(s) measured for each project implemented, which must align to the objective(s) the project was designed to accomplish. Agencies must report results for certain priority SNAP-Ed Evaluation Framework indicator(s) (if measured as part of the project), and they have the option to report results for other indicators. As such, it is critical during the planning stage for agencies to **identify the indicators that will be measured for each project and identify the methods that will be used to collect the measurements.**

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Link SNAP-Ed Projects to SMART Objectives

A SNAP-Ed project is an [intervention](#) or a cluster of interventions or activities⁹ executed by a single agency (State agency, implementing agency, or subcontractor) with common goals, intended outcomes, target audiences (e.g., youth), and implementation setting types (e.g., school). State and implementing agencies are strongly encouraged to review [Plan Module 3 – Planned Projects](#) and [REPORT Module 4 – Planned Evaluations](#) to understand the requirements for describing planned projects and reporting the outcomes of projects.

In this part of the Plan, State agencies must provide the name/title of each project, the agency conducting each project, and the SMART objective(s) to be addressed by each project. Planned projects must be:

- Comprehensive in scope and appropriate for communities and the [ELIGIBLE POPULATION](#), recognizing the population’s constrained resources and potential eligibility for Federal food assistance;
- Include activities that promote healthy food and physical activity choices based on the most recent DGA; and
- Include evidence-based nutrition education and obesity prevention intervention strategies and interventions.

An effective program will use interventions across multiple levels of the SEM. State agencies must be sure their Plan includes evidence-based activities using two or more SNAP-Ed approaches, including individual or group-based direct nutrition education, health promotion, and intervention strategies with one or more additional approaches as described under [Comprehensive SNAP-Ed Projects and Plans](#) in the Overview section. States may use the SNAP-Ed Toolkit

⁹ Project activities include planning and reporting.

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(<https://snapedtoolkit.org/interventions/find/>) to find peer reviewed evidence-based interventions which are qualify for use in SNAP-Ed. States may consult with their FNS SNAP-Ed Regional Coordinator on other interventions that may be allowable even if they are not currently featured in the SNAP-Ed Toolkit. FNS recommends that States use FNS, CNPP, or other Federal governmental agency developed or recommended materials when possible.

FNS encourages States to consider applying the Reach Effectiveness Adoption Implementation Maintenance (RE-AIM) framework in selecting SNAP-Ed interventions. The RE-AIM framework is designed to enhance the quality, speed, and public health impact of efforts to translate research into practice. The five RE-AIM steps to translate research into action are listed in the text box. More information on RE-AIM can be found at: <https://re-aim.org/applying-the-re-aim-framework/re-aim-guidance/use-when-planning-a-project/planning-tool/>.

The five RE-AIM steps are:

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

Link Nonproject Activities to SMART Objectives

Nonproject activities are all efforts funded by SNAP-Ed other than projects that are designed to accomplish State priority goals and objectives. Examples include comprehensive needs assessments, general staff training (e.g., civil rights training), technical assistance, and peer-to-peer learning that benefit staff across multiple projects. Other examples include convening of coalitions, contracted services such as evaluation and formative research, and other activities not tied to a specific project. Note that administrative activities, such as procurement, are neither projects nor nonproject activities. Administrative activities will be part of the SNAP-Ed budget in [Plan Module 6: Planned Staffing and Budget](#); they should not be included in Plan module 2.

In this part of the Plan, State agencies must provide a description of each nonproject activity, the agency conducting each nonproject activity, and the SMART objective(s) to be addressed by each nonproject activity.

SNAP-Ed Outreach

All State agencies must conduct SNAP-Ed outreach. Note that outreach specific to a SNAP-Ed project may be described in [Plan Module 3: Planned Projects](#). In Plan module 2, State agencies should summarize only general outreach efforts that are not tied to a specific project. Examples of SNAP-Ed outreach includes linkages and referrals with facilities and programs that serve the low-income population, such as county offices, food banks, public housing, or public assistance offices, etc. State agencies may also provide SNAP-Ed information on bulletin boards or through electronic media.

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Action Plan Overview

Provide a brief overview of how the planned SNAP-Ed efforts across implementing agencies and subgrantees fit together to address the target audiences' needs, accomplish SMART objectives, and complement other programs in the State to support individuals and families with low incomes in improving their healthy eating and physical activity behaviors.

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Plan Module 3: Planned Projects

State and implementing agencies will describe in module 3 the SNAP-Ed projects they have designed to support goals and objectives identified in Plan modules 1 and 2. State and implementing agencies will complete one copy of module 3 for each project.

Keep in mind that projects are a central unit of SNAP-Ed planning and reporting. In the Plan, agencies must provide a budget for each project. In the Annual Report, agencies are expected to report results and expenditures by project. Agencies are strongly encouraged to review [REPORT MODULE 4: PROJECT RESULTS](#) to ensure all data required for annual reporting are collected during project implementation.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Project Name

Provide the project name, year of implementation (e.g., if this will be the project's third year of implementation, enter "3"), and a brief description of the project. When describing the project, give particular attention to:

- Why specific population segments were chosen for intervention(s), such as need; trends; readiness for change; lack of availability of effective interventions with sufficient reach and expected impact; and likely partners
- Behavioral and environmental changes expected
- Key educational messages
- How and where services will be delivered
- Partner organization roles and contributions
- Duration of project
- Projected total number of individuals, sites, or systems that will participate or be reached
- For strategies that include social marketing, include the frequency of messages
- How project delivery will focus nutrition education and obesity prevention efforts on the SNAP-Ed population
- How the project will reflect audience's awareness and access to healthy foods and beverages, and places to be physically active.
- Plans to ensure the project is implemented as designed (i.e., with fidelity)

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Approaches

Indicate the stage(s) of implementation for each approach (i.e., [DIRECT EDUCATION](#); [POLICY, SYSTEMS, AND ENVIRONMENTAL CHANGE](#), [SOCIAL MARKETING](#) that is part of the project. Select all stages of implementation the project is anticipated to enter during the fiscal year.

Priority Populations

Specify the priority populations for the project (age groups, racial groups, ethnic groups, gender groups, disability status).

Languages

Indicate the language(s) in which each project approach will be offered.

Project Outreach (Optional)

Note that SNAP-Ed Outreach across the entire program is described by State agencies in [PLAN MODULE 2: STATE SNAP-ED ACTION PLAN](#). If any outreach efforts specific to a project will be conducted, describe them in this optional part of Plan module 3.

Direct Education and PSE Settings

Indicate the settings in which direct education and PSE interventions will be conducted. For each setting, provide the total planned number of sites (inclusive of those in Tribal jurisdictions and rural locations), the planned number of sites in Tribal jurisdiction, and the planned number of sites in rural locations. Also indicate if direct education, PSE, or both will be implemented in each setting. Agencies may use the [Federal Office of Rural Health Policy \(FORHP\) Data Files](#) to identify rural locations.

Social Marketing Campaign Scale

Accurately describing the geographic scale of social marketing campaigns is important for budget justification and to demonstrate the extent to which SNAP-Ed will reach the areas with the greatest need as identified by the needs assessment in [PLAN MODULE 1: IDENTIFY THE TARGET AUDIENCES AND THEIR NEEDS](#).

To describe the scale of a social marketing campaign, indicate the largest geographic unit used to plan the campaign. The largest geographic unit used for planning is defined as the biggest area to be covered in its entirety by the campaign. For instance, if a social marketing campaign will cover the entirety of four towns/cities, but not the entirety of the county that contains those towns/cities, the largest geographic unit used for planning would be towns/cities. If the social marketing campaign is planned by ZIP Code, census tract, towns/cities, counties/parishes/wards, and/or reservations, select the appropriate options to indicate the where the campaign will be implemented. If the campaign is planned by in-State media markets/metropolitan statistical areas/multicounty regions, multi-State media markets, and/or another means, describe the areas to be covered by the social marketing campaign.

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Evidence Base of Project Interventions

Indicate the number of SNAP-Ed Toolkit interventions the project will use, the number of other previously developed interventions the project will use, and the number of new interventions to be developed and/or implemented for the project. The following text describes the information to be provided for each type of intervention.

SNAP-Ed Toolkit Interventions

For each SNAP-Ed Toolkit intervention that will be used, indicate the intervention name and whether the intervention will be adapted for the project setting(s) or target audience. Briefly describe any planned adaptations and explain how the adaptations will better meet the needs of the target audience and/or better fit the project setting than the original intervention.

If an agency is planning to adapt a SNAP-Ed toolkit intervention, it should work with the original intervention developer to make the adaptations, evaluate the modified intervention to demonstrate effectiveness, and share results with the original intervention developer.

If a SNAP-Ed Toolkit intervention has already been modified and will be used in its modified form, use the open-ended response about adaptations to SNAP-Ed Toolkit interventions to explain how the intervention was adapted and if the adapted intervention has been previously approved for use by FNS. Agencies should also describe the evidence supporting the adapted intervention and the plans to further build the evidence-base if the adapted intervention is not yet considered research-tested (see below for criteria for research-tested interventions).

Other Previously Developed Interventions

For each other previously developed intervention that will be used, indicate the intervention name and whether the FNS Regional Office has granted approval to use this intervention prior to Plan submission.

Use the checklist provided in the Plan form to determine the level of evidence for each of the other previously developed interventions. There are three levels of evidence:

- ***Research-tested:*** The approach is based upon relevant rigorous nutrition and public health nutrition research, including systematically reviewed scientific evidence, and other published studies and evaluation reports that demonstrate significant effects on individual behaviors, food/physical activity environments, or policies across multiple populations, settings, or locales. Agencies may need to provide a citation to demonstrate an intervention is research-tested.
- ***Practice-tested:*** The approach is based upon published or unpublished evaluation reports and case studies by practitioners working in the field; these studies must show positive effects on individual behaviors, food/physical activity environments, or policies. Agencies must provide a citation to demonstrate an intervention is practice-tested.

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- *Emerging*: The approach includes community- or practitioner-driven activities that have the potential for obesity prevention but have not yet been formally evaluated for obesity prevention outcomes. Evaluation indices may reflect cultural or community-informed measures of success. For interventions identified as *emerging*, agencies must describe the foundational evidence base to be developed to establish or grow the evidence base for the emerging intervention.

If the intervention will be adapted for the project setting(s) or target audience, briefly describe any planned adaptations and explain how the adaptations will better meet the needs of the target audience and/or better fit the project setting than the original intervention.

If an agency is planning to adapt a previously developed intervention, it should work with the original intervention developer to make the adaptations, evaluate the modified intervention to demonstrate effectiveness, and share results with the original intervention developer.

New Interventions

The development of a new intervention is sometimes necessary when there are no existing interventions to address the needs of, or is appropriate for a target population. Before developing new interventions, States should conduct thorough literature reviews or environmental scans to justify their needs. For each new intervention that will be used, indicate the intervention name and whether the FNS Regional Office has granted approval to use this intervention prior to Plan submission. Then, describe who will be involved in developing the intervention, the intervention strategies, and materials. Also, explain the foundational evidence base and evaluation plan to be developed for the new intervention.

Agencies should discuss the rationale for developing the new intervention and the contents of the intervention with their Regional Office prior to Plan submission.

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Plan Module 4: Planned Evaluations

FNS recognizes the importance of SNAP-Ed evaluation. State and implementing agencies are required to provide an evaluation plan in module 4 for all formal evaluations that will be led by dedicated evaluation staff (internal or contracted).

Note that an evaluation plan is not required for standard [PROJECT MONITORING](#), which must be conducted for all SNAP-Ed projects. Project monitoring includes the collection and analysis of data on how the project was implemented and the outcomes the project was anticipated to affect. Frequently, the outcomes measured during SNAP-Ed project monitoring are short term and medium term measures from the SNAP-Ed Evaluation Framework. Especially in instances when the measured outcomes differ from what was expected, implementation data can be used to understand the outcomes. If the project was not implemented as planned, quality improvement efforts may focus on implementation. If the project was implemented as planned and the results differed from what was expected, quality improvement efforts might instead focus on project adaptations or even selecting entirely different interventions. Refer to [REPORT MODULE 4: PROJECT RESULTS](#) to see the required and optional reporting for data collected through project monitoring efforts.

Evaluation meets the reasonable and necessary standard when the evaluation:

- Is a systematic process that uses objective data to learn about the strengths and weaknesses of programs and practices
- Is essential to learn what works and how well it works so that you can direct SNAP-Ed resources to the most effective programs. Evaluation is needed for effective project/program management, efficiency, and accountability
- Can help achieve greater positive impact on the nutrition and health of low-income individuals, families, and their communities
- Includes a description of the proposed activity (i.e., has an approved Plan module 4 evaluation plan)
- Status and available results are included in Report module 5

FNS encourages States to publish and disseminate findings from their evaluation of SNAP-Ed projects so that other States with SNAP-Ed initiatives may benefit. However, FNS views publication of a journal article as a value-added activity for project management. Rather than using SNAP-Ed funds to cover direct costs associated with such publications, the Agency recommends State and implementing agencies consider manuscript development and publication as overhead activities that are supported by indirect costs.

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The following types of evaluation are appropriate and may be included in the SNAP-Ed Plan Module 4:

- **Formative:** Formative evaluation is done during the development of an intervention to shape the features of the intervention prior to implementation. It may be used to determine if a target audience understands the nutrition messages or to test the feasibility of implementing a previously developed intervention in a new setting. It may also involve testing of consumer and intermediary elements within program delivery, including consumer communication materials, training and intervention aids, and evaluation instruments. Formative research results are used to shape the features of the intervention itself prior to implementation, including adapting elements of an existing evidence-based intervention to a new audience, geographic area, or setting.
- **Process:** Process evaluation systematically describes how an intervention looks in operation or actual practice. It can involve such measures as tracking the number of materials distributed, counting the number of clients reached, measuring the effectiveness of alternate methods of delivering services, and documenting barriers to implementing the intervention. Process evaluation may also include a description of the context in which the program was conducted such as its participants and setting. Process evaluations are used to determine if an intervention was implemented as intended and is therefore likely to yield the expected outcomes; they may also illuminate strategies for overcoming identified barriers.
- **Outcome:** Outcome evaluation addresses the question of whether or not anticipated group changes or differences occur in conjunction with an intervention. Measuring shifts in a target group's nutrition knowledge before and after an intervention is an example of outcome evaluation. Such evaluation

For more information about evaluation, see [APPENDIX C](#) of this SNAP-Ed Guidance and the following with their associated links:

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

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indicates the degree to which the intended outcomes occur among the target population. It does not provide definitive evidence, however, that the observed outcomes are due to the intervention.

- **Impact:** Impact evaluation allows one to conclude authoritatively, whether or not the observed outcomes are a result of the intervention. In order to draw cause and effect conclusions, impact evaluations incorporate research methods that eliminate alternative explanations. This requires comparing those (e.g., persons, classrooms, communities) who receive the intervention to those who either receive no treatment or an alternative intervention. The strongest impact evaluation randomly assigns the unit of study to treatment and control conditions, but other quasi-experimental research designs are sometimes the only alternative available. Impact evaluations should meet the criteria described in the FNS Principles of Sound Impact Evaluation found at <http://www.fns.usda.gov/nutrition-education-principles-sound-impact-evaluation>.

FNS recommends that agencies discuss major evaluations with their Regional Coordinators prior to Plan submission. Such evaluations include large scale impact evaluations, significant multi-State or multiagency evaluations, and evaluations with budgets over \$400,000.

Whenever a State carries out a SNAP-Ed evaluation activity that costs more than \$400,000 in total, whether these costs are incurred in a single year or across multiple years, FNS strongly recommends that an impact evaluation be conducted. States may consider conducting impact evaluations with partners to assist in cost sharing. They also may submit proposed impact evaluations to their respective Regional SNAP-Ed Coordinators for consideration of related costs.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

For each evaluation to be conducted by dedicated evaluation staff, complete Plan module 4, indicating:

Evaluation Name

Project(s) ***Evaluated***

An evaluation may encompass one or more projects.

Evaluation Type (*formative, process, outcome, impact*)

Evaluation Details

Note that agencies will only describe the types of evaluations they plan to conduct.

- **For formative and process evaluations:**
 - Indicate the project components to be evaluated and evaluation dates. Note that an evaluation may span multiple years.

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- Indicate the data collection methods (e.g., self-administered paper survey, qualitative interview or focus group) and
- Indicate the planned use of results (e.g., intervention design, intervention adaptation or improvement). The planned use of results should help to justify the evaluation.
- **For outcome and impact evaluations:**
 - Indicate the project components to be evaluated
 - List the performance indicators that will be measured
 - Indicate the data collection methods (e.g., self-administered paper survey, qualitative interview or focus group)
 - Indicate the evaluation design. If the evaluation includes randomized assignment to a study group, provide the unit of randomization.
 - List the times measurements will be collected (i.e., pretest, posttest, other) and the evaluation start and end dates. Note that an evaluation may span multiple years.
 - Indicate the planned use of results (e.g., intervention adaptation or improvement, dissemination). The planned use of results should help to justify the evaluation.

Please note:

- Performance indicators to be used in evaluation must come from [PLAN MODULE 2: STATE SNAP-ED ACTION PLAN](#). If an important measure to be used for evaluation has not been specified in Plan module 2 and it is well-aligned to the State priority goals and objectives, consider modifying Plan module 2.
- Agencies conducting formal evaluations must conduct a thorough literature review and environmental scan to ensure the planned evaluation will not duplicate prior work. List prior evaluations done for this project.

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Plan Module 5: Coordination and Collaboration

Coordination between SNAP-Ed and other nutrition and obesity prevention efforts helps States maximize the reach and potential of Federal nutrition education and nutrition assistance programs. Consultation and collaboration with key stakeholders in project planning, implementation, and evaluation also helps to maximize the reach and effectiveness of SNAP-Ed efforts. State and implementing agencies must complete this module.

Note: A written agreement such as a Memorandum of Agreement or Understanding that outlines the responsibilities of all the State agencies involved in the collaboration should be kept on file for SNAP-Ed projects delivered in coordination with another agency when funds are involved. Written agreements are required for all other collaborations that involve any type of financial or budget management issues. States may maintain written agreements in electronic format. The agreement should list the location and the contact information for the responsible person(s) for each project implemented locally. A separate agreement for each local project implemented under it is not necessary. The State agreement is signed by all the State agencies involved. Examples where an agreement would be necessary are school-based projects that collaborate with the State Department of Education or a breastfeeding project that collaborates with the WIC State agency. In the WIC example, there would be one agreement signed between the State WIC agency and the State SNAP agency that would have a list of all the local breastfeeding projects to be implemented under the agreement. For the county governments, if there is no “umbrella” organization that can sign an agreement on behalf of the local entities, then a written agreement for each local project is needed.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Coordination and Collaboration With Other Federal Nutrition, Obesity Prevention, and Health Programs

States must consult and coordinate with State and local operators of other [FNS programs](#), such as the Fresh Fruit and Vegetable Program (FFVP) and FDPIR, when developing their SNAP-Ed Plan, so that SNAP-Ed complements the nutrition education and obesity prevention activities of those programs. Indicate the Federal programs with which SNAP-Ed will coordinate and the purpose of the coordination in Plan module 5. Note that a brief narrative description of how coordination efforts avoid duplication of services should be provided in the action plan overview in [MODULE 2: STATE SNAP-ED ACTION PLAN](#), especially when two IAs are working in the same venue or jurisdiction. See details in [COORDINATION AND COLLABORATION REQUIREMENTS](#).

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In [REPORT MODULE 2 - COORDINATION AND COLLABORATION](#), agencies will complete a nearly identical section on Federal programs. When the electronic reporting is fully implemented, most of the coordination and collaboration information from the plan will auto-populate to the annual report. An important distinction to consider during the planning phase is that in the Annual Report, only the significant coordination and collaboration conducted with other Federal programs is included. To be considered significant, there must be regular ongoing dialogue and information or resource sharing. Only providing space for SNAP-Ed programming or distributing SNAP-Ed materials is not considered significant coordination or collaboration.

Engagement With Multisector Partnerships/Coalitions

Multisector partnerships and coalitions are an important indicator of work at the Sectors of Influence level in the SNAP-Ed Evaluation Framework (e.g., indicator ST8). These partnerships can be at the multi-State, State/Territory, local, or Tribal level and are composed of at least five diverse sector representatives that engage in coordinated planning for changes in policies and/or practices for nutrition, physical activity, food security, and/or obesity prevention. These partners work together as a coalition, such as in a SNAP-Ed State Nutrition Action Council (SNAC) or a local food policy council.

Agencies must indicate the name of the partnership/coalition, the sectors represented, and the geographic level of the partnership/coalition. Agencies must also provide a brief description of key activities planned with the partnership/coalition.

Consultation, Coordination, and Collaboration with Indian Tribal Organizations (ITOs)

SNAP regulations at 7 CFR 272.2(b) and 272.2(e)(7) require States to actively engage in Tribal consultations about the SNAP State Plan of Operations, which includes the SNAP-Ed State Plan. The consultations must pertain to the unique needs of the members of Tribes.

SNAP-Ed States must explicitly describe how they have consulted with Indian Tribal Organizations in their SNAP-Ed Plans. SNAP-Ed Regional Coordinators can only approve SNAP-Ed Plans that include the following:

- Name of the Indian Tribal Organization or Indian Tribal Organization representative
- Nature of planned consultation, coordination, and collaboration
- Brief description of the planned consultation, coordination, and collaboration; and staff time in full-time equivalence (FTE) and funding distribution to ITOs if applicable.

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Coordination and Collaboration with Minority-Serving Institutions (MSIs)

Minority-serving institutions (MSIs) are institutions of higher education that serve minority populations and receive U.S. Department of Interior funding and resources on behalf of their students and communities. MSIs include historically Black colleges and universities (HBCUs), Hispanic-serving institutions (HSIs), Tribal colleges and universities (TCUs), and Asian American and Pacific Islander Serving institutions (AANAPISIs).

Agencies coordinating and/or collaborating with MSIs should provide the MSI name; MSI type; the nature of the planned coordination and collaboration; a brief description of the planned coordination and collaboration; and staff FTE and funding distribution to MSIs if applicable.

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Plan Module 6: Planned Staffing and Budget

State and implementing agencies must complete this module to describe their planned staffing and budgets. Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Planned Staffing

SNAP-Ed funds are used to pay staff who support SNAP-Ed delivery. For each staff person who will be paid using SNAP-Ed funds, provide the position title; full-time equivalents (FTEs) charged to SNAP-Ed; SNAP-Ed salary, benefits, and wages; percentage of SNAP-Ed time spent on management/administrative duties; and percentage of SNAP-Ed time spent on SNAP-Ed delivery.

Position title examples include Nutrition Educator, Project Coordinator, etc. Attach a document with brief job descriptions for each position (i.e., list SNAP-Ed related job duties that demonstrate how the position will support SNAP-Ed activities). Indicate any vacant positions by writing “(vacant)” next to the position title. For example, “Nutrition Educator (vacant).”

Note that for each key management position title, agencies must retain a one-page resume or curriculum vitae (CV) onsite for Management Evaluation (ME) review that demonstrates relevant expertise and experience for the individual proposed to fill the position. Resumes and CVs do not need to be submitted with your State SNAP-Ed Plan. If a position is vacant, retain the CV once the position is filled.

For FTEs charged to SNAP-Ed, States may use the definition of FTE provided in [APPENDIX E: DEFINITIONS OF TERMS](#) or provide their own definition of FTEs for purposes of reporting SNAP-Ed staffing needs. Agencies using their own definition should provide an explanation of how FTEs are calculated.

For the total salary, benefits, and wages that will be paid with SNAP-Ed fund, an estimate may be used for the budget provided in *PLAN MODULE 6 – PLANNED STAFFING AND BUDGET*. For the financial reporting in [REPORT MODULE 3 – SNAP-ED FINANCIAL REPORTING](#), actual time employees spent on SNAP-Ed must be used to determine expenditures.

For each position title, provide the percentage of SNAP-Ed time the position will spend performing management/administrative duties (including training, professional development, required Federal reporting) and the percentage of SNAP-Ed time to be spent on SNAP-Ed delivery. SNAP-Ed delivery includes all approaches described in **Section 1**. The information about time allocation should align with information provided in the attached position descriptions.

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Planned Budget

State agencies should fully account for the planned use of SNAP-Ed funds by providing their total planned budget for each sub-grantee that is a recipient of a Federal grant, cooperative agreement, or contract related to SNAP-Ed; direct costs for each project implemented by the State agency; direct costs for all other State agency SNAP-Ed expenditures; and planned indirect cost expenditures. State agencies should coordinate with sub-grantees to also provide a detailed planned budget for each sub-grantee project and all other sub-grantee SNAP-Ed expenditures.

Direct cost categories

include salary/benefits, contracts/sub-grants/agreements, noncapital equipment/office supplies, nutrition education materials, travel, building space lease or rental, cost of publicly owned building space (commercial rental space charges cannot be used for publicly owned space), maintenance and repair, institutional memberships and subscriptions, and equipment and other capital expenditures.

Planned Implementing Agency Budgets

List each sub-grantee and provide their total planned operating budget for the fiscal year.

Note: Retain a copy of any interagency agreement(s) that identifies how Federal funds will be paid between the State or county agency and/or other agencies. For each contract, grant, or agreement, provide the sub-grantee name, total funding, Federal funding requested, description of services and/or products, and the cost of services and/or products.

Planned Project Budgets

Provide the planned operating budget for each SNAP-Ed project the State agency or State agency sub-grantees will implement during the fiscal year that includes all relevant direct cost categories, including those associated with developing the SNAP-Ed Plan and Annual Report.

Planned Budget for Other SNAP-Ed Expenditures

Provide the planned operating budget for other SNAP-Ed expenditures, if applicable, that includes all relevant direct cost categories. Other SNAP-Ed expenditures may include nonproject activities described in [PLAN MODULE 2: STATE SNAP-ED ACTION PLAN](#) and other activities not accounted for in a project budget (e.g., negotiating sub-grantee contracts/agreements, providing civil rights training, contracted services such as evaluation or formative research).

Planned Total Budget

In addition to the above planned expenditures, to fully account for the planned use of SNAP-Ed funds, provide the following additional information:

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- **Total indirect costs.** Include both a total and the indirect cost rate. Provide assurance that the indirect cost rate is an approved rate as described in Appendix C.
- **Total anticipated Federal cost**
- **Estimated unobligated balances (carry-over) from current FY to next FY, if any.** Please note that funds cannot be obligated the next Federal FY if the funds are in the last year of their two-year period of performance.
- **Total Federal SNAP-Ed budget for current Federal FY (funds requested from current Federal FY allocation)**

Budget narrative

Provide a budget narrative to justify total planned expenditures for each direct cost category:

Salaries/benefits

Contracts/Subcontracts/Agreements

Noncapital Equipment/Office Supplies

Nutrition Education Materials

If there is a cost for using existing educational materials, provide a justification for using proposed materials versus those that are available at no cost. Describe any new materials that you plan to produce or purchase and justify the need and cost.

Travel

When justifying travel, provide the number of in-State and out-of-State trips and describe for each trip the purpose/benefit to SNAP-Ed, travel location, staff positions traveling, and trip details (e.g., number of staff, cost per unit, and number of units for each travel cost category). To be considered for funding, travel requests should provide a direct and clear link to how the training will improve the agency's ability to provide quality SNAP-Ed programming for the target audience.

Building/Space Lease or Rental

Cost of Publicly Owned Building Space

Maintenance and Repair

Institutional Memberships and Subscriptions

Equipment and Other Capital Expenditures

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Plan Module 7: Assurances and Signatures

To assure compliance with policies described in this Guidance, the SNAP-Ed Plan includes specific assurances. For example, a State agency is responsible for civil rights compliance of its sub-grantees, contractors, and sub-recipients. The State SNAP agency (the cognizant agency) is responsible for ensuring the compliance of all funded providers. Refer to [APPENDIX A](#) for the full list of assurances.

- The State SNAP agency is accountable for the content of the State SNAP-Ed Plan and provides oversight of any sub-grantees. The State SNAP agency is fiscally responsible for nutrition education activities funded with SNAP funds and is liable for repayment of unallowable costs.
- Efforts have been made to target SNAP-Ed to the SNAP-Ed target population.
- Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) are claimed under the SNAP-Ed grant. Approved activities are those designed to expand the State's current EFNEP coverage to serve additional SNAP-Ed individuals or provide additional education services to EFNEP clients eligible for the SNAP. Activities funded under the EFNEP grant are not included in the budget for SNAP-Ed.
- Documentation of payments for approved SNAP-Ed activities is maintained by the State and will be available for USDA review and audit.
- Contracts are procured through competitive bid procedures governed by State procurement regulations.
- Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations, including Civil Rights and Office of Management and Budget circulars governing cost issues.
- Program activities do not supplant existing nutrition education programs and, where operating in conjunction with existing programs, enhance as well as supplement them.
- Program activities are reasonable and necessary to accomplish SNAP-Ed objectives and goals.
- All materials developed or printed with SNAP-Ed funds include the appropriate USDA nondiscrimination statement and credit to SNAP as a funding source.
- Messages of nutrition education and obesity prevention as consistent with the Dietary Guidelines for Americans.

The SNAP-Ed Plan shall be signed by the head of the State agency and submitted prior to funding of nutrition education and obesity prevention activities when the State agency elects to request Federal grant funds to conduct these SNAP-Ed activities. The *ASSURANCES AND SIGNATURE FORMS* are in [APPENDIX A](#). The Plan shall be submitted for

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

approval no later than August 15. Approved plans become effective the following FFY October 1 to September 30. **End of new materials.**

Guidelines for Developing the Annual Report

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

- Summarize the nutrition education and obesity prevention projects implemented and related achievements in the fiscal year.
- Using evaluation and outcome results, discuss the effectiveness of the SNAP-Ed projects and interventions and how they might be improved in the upcoming fiscal year.
- Describe annual and longer-term progress toward achieving objectives and otherwise synthesize accomplishments and learnings that are expected to modify current- or future-year objectives, targeting, interventions, and partnerships.
- **New:** Report on relevant SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention Indicators in [Report Module 4: Project Results](#). Performance indicators and measures not captured in the standardized sections of module 4 can be reported at the end of the module. Additional detail information about the SNAP-Ed priority indicators is available at the online [SNAP-Ed Toolkit](#).

Each recommended SNAP-Ed Annual Report module **section** and **subsection** is discussed below along with **key content**. To the extent possible, external resources are identified in bullet form with live links; these resources and links can also be found on the [SNAP-Ed Connection](#). **End of new materials.**

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

Report Module 1: Executive Summary

New: State and implementing agencies are encouraged to familiarize themselves with the contents of this module before completing their Annual Report. However, FNS advises that agencies wait until they have finished all other Report modules before completing Report module 1. The executive summary will be easier to complete after reviewing the details provided in the other Report modules.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Key Successes

The Annual Report executive summary describes the State and implementing agencies' key successes related to their SMART objectives and other important achievements from the fiscal year.

SNAP-Ed Projects and Activities (State agencies only)

State agencies will also provide a summary of the projects and activities implemented. This narrative summary can be an update of the action plan overview from [PLAN MODULE 2: STATE SNAP-ED ACTION PLAN](#). It should describe how the work carried out across implementing agencies and subgrantees fit together to address the target audiences' needs, accomplish SMART objectives, and complement other programs in the State to support individuals and families with low incomes in improving their healthy eating and physical activity behaviors.

Reaching the Target Audience

Review data from [REPORT MODULE 4: PROJECT RESULTS](#) on the places SNAP-Ed was implemented and the demographic characteristics of direct education participants. Use this information to describe the program's geographic breadth and demographic reach statewide across all implementing agencies and all approaches (direct education, PSE change, and social marketing).

Then, review the identified gaps in program reach, access, and appropriateness from [PLAN MODULE 1: IDENTIFY THE TARGET AUDIENCES AND THEIR NEEDS](#). Describe how the implemented projects addressed these gaps.

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Report Module 2: Coordination and Collaboration

State and implementing agencies should review *PLAN MODULE 5: COORDINATION AND COLLABORATION* and update the information to reflect the coordination and collaboration conducted during the fiscal year.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Coordination and Collaboration With Other Federal Nutrition, Obesity Prevention, and Health Programs

Update information provided in the Plan on planned coordination and collaboration with other Federal programs to reflect work done and accomplishments achieved during the fiscal year. Note that only significant coordination and collaboration with other Federal programs should be reported. To be considered significant, there should have been regular ongoing dialogue and information or resource sharing. Only providing space for SNAP-Ed programming or distributing SNAP-Ed materials would not be considered significant coordination or collaboration. Agencies should retain all written agreements outlining roles and responsibilities of entities involved.

Engagement With Multisector Partnerships/Coalitions (ST8)

Update information provided in the Plan about planned multisector partnerships/coalitions to reflect work done and accomplishments achieved during the fiscal year.

Consultation, Coordination, and Collaboration With Indian Tribal Organizations

Update the information provided in the Plan about planned consultation, coordination, and collaboration with Indian Tribal Organizations to reflect work done and accomplishments achieved during the fiscal year.

Coordination and Collaboration With Minority-Serving Institutions

Update the information provided in the Plan about planned coordination and collaboration with MSIs to reflect work done and accomplishments achieved during the fiscal year.

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Report Module 3: SNAP-Ed Financial Reporting

State agencies will use Report module 3 to provide FNS a complete picture of their expenditures, including total expenditures associated with each implementing agency contract; expenditures for each project implemented by the State agency, if applicable; and all other direct expenditures. Implementing agencies will use Report module 3 to provide a complete picture of their expenditures, including expenditures for each of the implementing agency's projects and all other direct expenditures. State and implementing agencies will report expenditures in a format similar to the budget (see [PLAN MODULE 6: PLANNED STAFFING AND BUDGET](#)); refer to the description of that module for additional detail on providing the information. Module **sections** are listed below.

SNAP-Ed Implementing Agency Expenditures (State agencies only)

SNAP-Ed Project Expenditures

Other SNAP-Ed Expenditures

SNAP-Ed Expenditures Total

Program Income

Agencies must report program income if any was generated and describe how the income was generated and how the income was or will be used to support SNAP-Ed.

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Report Module 4: Project Results

State and implementing agencies that conducted projects during the fiscal year must complete Report module 4 to describe the results of those projects. All data required in Report module 4 should be collected through *PROJECT MONITORING* efforts. One copy of Report module 4 must be completed for each project.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Project Detail

Begin by providing an overview of the project, including the:

Approaches

Projects may include *DIRECT EDUCATION*, *PSE CHANGE*, and/or *SOCIAL MARKETING*.

Interventions Used

SNAP-Ed Evaluation Framework Indicators Measured

Note that all of these project elements will already be shown in the Report form as planned; agencies should only need to update the information to reflect the project as implemented.

Project Sites

Information on project sites is used to describe the geographic reach of SNAP-Ed efforts and the diversity of sites. Provide the name of all sites where SNAP-Ed projects were conducted. For each site, indicate the setting type, whether the site is within a Tribal jurisdiction, the intervention approach(es) implemented there, and the address. Note that social marketing campaigns conducted in broader areas (i.e., not specific sites) will be described elsewhere in Report module 4; those areas should not be reported as project sites. If a site could be classified under several settings (e.g., a childcare center located within a faith-based organization), report the setting most relevant to the target audience of the project implemented. If the project focuses on children and parents in the childcare center, report the setting as childcare. If the project focuses on all members of the faith-based organization, report the setting as faith-based organization.

Direct Education

Direct education results focus primarily on intervention development for interventions yet to be implemented and reach and behavior change for interventions that were implemented.

Stage

The type of information reported depends on whether the direct education intervention was implemented. Begin by indicating if the intervention was implemented during the fiscal year.

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Planning and Development Results

For direct education interventions not yet implemented, describe the results of work done this fiscal year to plan and develop direct education. Related activities might include formative research, coordination and collaboration efforts that informed development, material adaptation and the adaptation process, and material development and the development process.

The following module sections are only applicable for direct education interventions that were implemented:

Languages

Reach

Number of SNAP-Ed direct education participants (unduplicated)

Direct education reach should be unduplicated counts, meaning the number of unique individuals reached through the project, regardless of the number of direct education sessions or contacts. Actual counts collected from direct education participants through sign-in forms or other methods should be used whenever possible. Estimated counts may be used in the absence of data collected directly from participants.

Note: When reporting on reach, the categories of age, gender, and ethnicity are mutually exclusive; the total number of people must therefore be the same when broken down by age, gender, and ethnicity. The racial categories, however, are not mutually exclusive. People may identify with more than one race, so the total number of people across all racial categories may be greater than the total number of unique individuals.

Explanation of estimation method(s)

If estimated counts are used, agencies must describe the estimation methods.

Mode of delivery

If direct education sessions are delivered in-person or in a live online format, agencies should report the types of series offered (e.g., single sessions, series of 2-4 sessions) and the total number of sessions delivered. Interactive multimedia may not have discrete sessions, as it is content designed for participants to complete at their own pace. Sessions should not be reported for interactive multimedia.

For all modes of delivery for direct education interventions, agencies must provide an estimate of the total amount of time participants engaged on average. If, for instance, participants attended an average of 3 sessions in a series of 4 60-minute sessions, the average amount of time participants engaged would be 180 minutes. For interactive multimedia, agencies should use an estimation method that matches the intervention. Agencies may be able to directly measure the amount of time participants logged into an interactive multimedia site. Alternatively, agencies may be able to measure the number of web pages visited or activities completed per participant and estimate the amount of time spent on each to derive the total time spent.

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Behavior Change (MT1: Healthy Eating, MT2: Food Resource Management, MT3: Physical Activity and Reduced Sedentary Behavior)

State and implementing agencies should collect data on the health behaviors targeted by their direct education interventions before and after the intervention (i.e., via pretest and posttest). State agencies do not need to track individuals over time to directly measure changes in their health behaviors; doing so may present overly burdensome privacy and data security challenges. Instead, agencies can draw inference about behavior change by comparing group-level data from before and after the intervention. These group-level data include averages and standard deviations for continuous measures (e.g., average cups of fruit consumed per day) and proportions for categorical measures (e.g., the number of people who drink sugar-sweetened beverages no more than once per week out of the total number of people who completed the health behavior assessment).

For continuous measures of health behavior, the AVERAGE and STDEV functions in Microsoft Excel can be used to quickly calculate the mean and standard deviation. Imagine that the cups of fruit consumed each day by five participants were 0, 0.5, 1, 1.5, and 2. The mean would be 1 and the standard deviation would be 0.79. Type “=AVERAGE(0, 0.5, 1, 1.5, 2)” into a cell in Microsoft Excel to find the mean and “=STDEV(0, 0.5, 1, 1.5, 2)” to find the standard deviation.

Other outcomes should be reported as the number of individuals meeting SNAP-Ed health behavior reporting guidelines. Note that these reporting guidelines are to be used exclusively for the purposes of SNAP-Ed reporting; they should not be used in place of dietary or other guidelines. See the following table for the SNAP-Ed health behavior reporting guidelines on these outcomes. For guidance on using responses to common survey items to determine whether a health behavior meets the SNAP-Ed health behavior reporting guidelines, see the supplementary materials published by Ryan-Ibarra et al. (2020) at <https://www.cambridge.org/core/journals/journal-of-nutritional-science/article/us-supplemental-nutrition-assistance-program-education-improves-nutritionrelated-behaviors/800EA36922D8896F89A0FD6FC8C4CF7C#supplementary-materials>.

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Outcome	< 5 years	5-17 years	≥18 years
Eat more than one kind of fruit throughout the day or week (MT1c) ¹	More than one kind per day		
Eat more than one kind of vegetable throughout the day or week (MT1d) ¹	More than one kind per day OR At least five kinds per week		
Drinking fewer sugar-sweetened beverages (MT1h) ²	No more than once/week		
Choose healthy foods for my family on a budget (MT2a)	At least often		
Read nutrition facts labels or ingredients lists (MT2b)	At least often		
Not run out of food before month's end (MT2g)	Never or rarely run out of food		
Compare prices before buying foods (MT2h)	At least often		
Identify foods on sale or use coupons to save money (MT2i)	At least often		
Shop with a list (MT2j)	At least often		
Moderate-vigorous physical activity (MT3b)	Physically active throughout day	60+ min MVPA/day	150 – 300 min MPA/week, or 75 - 150 min VPA/week

1 – The [MyPlate Plan](#) recommends daily intake for vegetable, fruit, grains, protein and dairy groups based on age, sex, height, weight and physical activities level.

2 – The Dietary Guidelines for Americans do not specify a recommended frequency for sugar-sweetened beverage consumption, but they do recommend limiting added sugars.

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Interventions targeting the following priority health indicators should report those outcomes:

Healthy eating behavior changes (MT1)

- Eat more than one kind of fruit throughout the day or week (MT1c)
- Eat more than one kind of vegetable throughout the day or week (MT1d)
- Cups of fruit per day (MT1l)
- Cups of vegetables per day (MT1m)
- Times per day fruits were consumed
- Times per day vegetables were consumed
- Drink fewer sugar-sweetened beverages (MT1h)

Food resource management behavior changes (MT2)

- Choose healthy foods for my family on a budget (MT2a)
- Read nutrition facts labels or ingredients lists (MT2b)
- Not run out of food before month's end (MT2g)
- Compare prices before buying foods (MT2h)
- Identify foods on sale or use coupons to save money (MT2i)
- Shop with a list (MT2j)

Physical activity and reduced sedentary behavior changes (MT3)

- Moderate-vigorous physical activity (MT3b)

State and implementing agencies should indicate the other MT1, MT2, and MT3 indicators measured among direct education participants. Future iterations of the Annual Report form may provide formatted space to report MT1, MT2, and MT3 outcomes commonly measured in SNAP-Ed. In the current Report form, agencies may report these outcomes in the [OTHER RESULTS \(OPTIONAL\)](#) subsection at the end of Report module 4.

Policy, Systems, and Environmental Change Initiatives

Agencies should report the PSE changes maintained and the PSE changes adopted with the support of staff and/or funding from SNAP-Ed.

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PSE Changes (MT5: Nutrition Support and MT6: Physical Activity and Reduced Sedentary Behavior Support)

PSE changes are reported at the site level. For each site with a PSE change, provide:

- **Estimated site reach.** For reference on estimating site reach, see Kansas State University Program Evaluation and Reporting System (PEARS) support on documenting reach: <https://support.pears.io/document-reach/>.
- **Type of PSE change.** Select all PSE change types maintained or adopted using the list of options provided in the online form.
- **Description of PSE change.** Provide a brief description of each change made. If the same PSE change was maintained or implemented in multiple sites, use the same description.

Active Partners (ST7: Organizational Partnerships or ST8: Multi-Sector Partnerships and Planning)

Agencies must also describe the active partners involved in PSE changes. Active partners include individuals or organizations who regularly meet, exchange information, and identify and implement mutually reinforcing activities with SNAP-Ed to contribute to the adoption of one or more PSE changes (such as those listed in MT5 and MT6). For each type of active partner, provide:

- The number of partners (e.g., the number of Indian Tribal Organizations)
- The geographic level of the partners (State/territory, regional, tribal, and/or local)
- The contributions of the partners

Social Marketing Campaigns

Social marketing campaign results focus primarily on intervention development for interventions yet to be implemented and reach for interventions that were implemented.

Stage

The type of information reported depends on whether the social marketing campaign was implemented. Begin by indicating the stage of implementation for the social marketing campaign.

Planning and development results

For social marketing campaigns not yet implemented, describe the results of work done this fiscal year to plan and develop the campaign. Related activities might include formative research, coordination and collaboration efforts that informed development, material adaptation and the adaptation process, and material development and the development process.

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For social marketing campaigns that were implemented, indicate the languages in which the campaign was implemented, the topics of the campaign, the campaign scale, the market segments potentially reached, and the reach and engagement by channel.

Languages

Campaign topics

Campaign scale

Campaign scale is reported in the same format as it is planned; see [PLAN MODULE 3: PLANNED PROJECTS](#).

Market segments (MT12b)

If the social marketing campaign was conducted in specific sites (e.g., schools), use the methods described above for [PSE CHANGES \(MT5 AND MT6\)](#) to estimate site-level reach. Add the reach from each site to estimate the overall reach.

If the social marketing campaign was conducted in a broader area (zip codes, towns/cities), use Census Bureau data or other sources as described for the needs assessment in [PLAN MODULE 1: IDENTIFY THE TARGET AUDIENCES AND THEIR NEEDS](#) to provide the number of SNAP-Ed eligible individuals and the total number of individuals where the social marketing campaign was conducted. As in the needs assessment, 185 percent of the Federal poverty guideline may be used as a proxy for the SNAP-Ed eligible population.

Reach and engagement by channel (MT12b)

Agencies should provide data on reach and engagement for each channel used for the social marketing campaign. Note that agencies are not required to estimate the unduplicated reach across all channels used for the campaign. For instance, if the same 100 individuals are reached through social media as are reached through posters in a community center, 100 can be reported for each of those channels.

Agencies are encouraged to report the estimated SNAP-Ed-eligible reach of their campaign by channel if reliable estimates are available or can be produced. Social marketing reach is the total number of unique individuals exposed at least once to campaign materials during a given period. Methods for determining reach depend on whether the channel is online (e.g., social media, digital advertisements) or offline (e.g., billboards, traditional media advertisements).

- **For online channels**, estimates of reach can be obtained directly from a social media platform or through Google Analytics, a free resource that is relatively easy to use.
- **For offline channels**, vendors (i.e., companies that sell advertisement space) can often provide reach data. Alternatively, agencies can estimate reach based on census tract population data as described in [Market Segments \(MT12b\)](#).

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The following table provides a list of potential reach data sources by social marketing channel.

Channel and Description	Potential Sources of Reach Data
Any channel	<ul style="list-style-type: none"> Survey a sample of the target audience for recall rate; if several channels are used, ask which contributed to the recall; must weight by population data. If the advertisement directs viewers to a unique URL, Google Analytics (or another analytical tool) can be used to estimate reach.
Traditional media advertisements <i>Ads on broadcast or cable TV or radio</i>	<ul style="list-style-type: none"> Commercial data, usually purchased by larger stations, can be used to estimate reach.
Billboards, transit advertising <i>Outdoor billboards and interior/ exterior transit advertising</i>	<ul style="list-style-type: none"> Vendors use formulas to estimate reach using impression data and census tract population data.
Social media <i>Organic, paid, or boosted posts</i>	<ul style="list-style-type: none"> Reach metrics are available for all social media platforms. Facebook and Instagram can deduplicate accounts across platforms.
Digital media advertisements <i>Ads on platforms such as online TV, YouTube, digital radio, and podcasts, and websites</i>	<ul style="list-style-type: none"> Google Ads Manager can report reach based on cookies for up to 90 days. If an advertisement directs viewers to a unique URL, Google Analytics (or another analytical tool) can be used to estimate reach. Vendors may be able to provide other data to estimate unique reach.
Websites <i>Websites used only for campaign materials</i>	<ul style="list-style-type: none"> Google Analytics (or another analytical tool) can be used to estimate reach.

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Channel and Description	Potential Sources of Reach Data
YouTube channel <i>Channel displaying campaign materials as videos</i>	<ul style="list-style-type: none">• Unique viewers can be used to estimate reach for a 90-day period.
Site-level assets <i>Posters, banners, a-frames, recipe cards, etc.</i>	<ul style="list-style-type: none">• A percentage of the total promotional resources distributed can be used to estimate reach.
Email updates <i>Messages sent to a list of subscribers via email</i>	<ul style="list-style-type: none">• The number of individuals who open an email can be used to estimate reach.

Agencies are encouraged to report on engagement with their campaign if reliable estimates are available or can be produced. Engagement is a measure of actions, including comments, likes, clicks, and shares on digital platforms. Some engagement measures may be obtained directly from social media platforms or through Google Analytics.

Agencies are required to report campaign impressions by channel. Impressions represent the total number of times content is displayed to an audience during a given period. This metric is commonly used and readily available for most channels.

Indirect Education Channels

For SNAP-Ed purposes, *INDIRECT EDUCATION CHANNEL* is defined as the distribution or display of information and resources, including any mass communications, public events (such as health fairs), and materials distribution, which involve no participant interaction with an instructor or multimedia. If any indirect education was done outside of social marketing campaigns, report the language(s) and channel(s) used.

Language

Channels

Other Results (Optional):

State and implementing agencies may use this space to provide results not already captured in Report module 4.

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Report Module 5: Evaluation Reports

State and implementing agencies that conducted evaluations with dedicated evaluation staff (internal or contracted) should complete an evaluation report. Note that an evaluation report is not required for standard *PROJECT MONITORING*, which must be conducted for all SNAP-Ed projects.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Project Evaluation Overview

Begin by indicating the project(s) included in the evaluation and the type(s) of evaluations conducted.

Project(s) Evaluated

Evaluation Type

Formative and Process Evaluation Summary

For formative and process evaluations, indicate the project components evaluated, the data collection methods, the data collection tools, the results and conclusions, and the use of the results. For formative evaluations, the results and conclusions should describe how interventions will be adapted or developed to meet the needs of the target audience(s).

- For process evaluation results and conclusions, consider the reach, adoption, implementation, and maintenance aspects of RE-AIM (<https://ebccp.cancercontrol.cancer.gov/reAimCriteria.do>) as well as other implementation outcomes (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3068522/>).

Outcome and Impact Evaluation Design

The online Annual Report form will show the information provided in [PLAN MODULE 4: PLANNED EVALUATIONS](#) on planned outcome and impact evaluations. Update the information as necessary to reflect the outcome and/or impact evaluation conducted.

Outcome and Impact Evaluation Objectives, Analysis, Results, Conclusions, and Dissemination Plan

Describe the objective(s) and analytic methods for the evaluation. Include specific research questions and hypotheses and the way data will be analyzed to answer those questions or test the hypotheses.

Then, provide the number of individuals in the comparison or control group and the number in the intervention group. Indicate how many individuals in each study group completed the pretest and posttest assessments and how these samples were selected (e.g., a random sample, census of all project participants). If data were collected at

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more than two timepoints, explain the timing of other rounds of data collection and the sample included in the data collection.

Next, summarize the evaluation results and conclusions. Begin this summary by providing data on intervention participation and the sample analyzed. For intervention participation, indicate the number of participants who received the intended intervention dose (e.g., completed a target number of direct education sessions). For the sample analyzed, describe why any individuals (or other analytic units) who were part of the study were not part of the sample analyzed (e.g., lost to follow-up). Then, provide quantitative and qualitative results for the SNAP-Ed evaluation performance indicators selected in *PLAN MODULE 2: STATE SNAP-ED ACTION PLAN* for the projects evaluated.

Last, indicate how the results of the evaluation will be used (e.g., intervention adaptation or improvement, conference presentation, peer-reviewed or other paper).

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Report Module 6: Major Challenges and Modifications from Plan

State and implementing agencies should complete Report module 6 to describe major challenges implementing SNAP-Ed as planned, how the challenges limited progress toward the State priority goals, any modifications made or planned for the next fiscal year to address the challenges, and potential solutions in the future to prevent or overcome the challenges.

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Report Module 7: Success Stories

State and implementing agencies are encouraged to provide at least two success stories from the reporting year. Agencies are expected to include success stories from PSE or multilevel projects and efforts involving diverse partners in collaborative work to achieve the State's goals and objectives. Other topics include staff/partner trainings, conference presentations and/or other journal publications, curriculum development, partnership activities, and awards. For each success story, provide background information and the story itself. Files may be attached as part of the success story.

Additional guidance and instructions are presented below by module **section** and **subsection**; **key content** is outlined where relevant.

Background

Before providing the story, give the following information. Many of these pieces of information will be entered into prior Report modules; agencies will merely need to select the piece of information relevant for the success story.

Story title

Choose a short, descriptive title.

Site(s) or organization(s)

Location (region, county, Tribal jurisdiction, city, or neighborhood)

Activity name

The success story can be about a project or a nonproject activity.

Project Target Population(s)

Related framework indicators

Types of partners involved

The Story

The story itself should describe what was done and the impact it had.

Activity description

Story narrative

Favorite quotes

File Attachments (Optional)

Agencies may attach pictures, graphics, media coverage, or other materials related to the success story. **End of new materials.**

Section 3: Financial and Cost Policy

The Financial and Cost Policy Section describes policies as required by Section 28 of the Food and Nutrition Act of 2008, as amended. This section also describes the impact of these policies on various funding-related SNAP-Ed activities. Where applicable, changes have been made to comply with 2 CFR 200 - *UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS (UNIFORM GUIDANCE)*, <https://www.govinfo.gov/content/pkg/CFR-2018-title2-vol1/xml/CFR-2018-title2-vol1-part200.xml>.

State Agency Requirements

A State Agency must submit a SNAP-Ed Plan should it decide to request grant funds to conduct SNAP-Ed activities. If a State agency does not submit an approvable Plan, FNS may reallocate the State's grant among other States with approved Plans. The SNAP-Ed Plan must include an operating budget for the Federal fiscal year with an estimate of the cost of operation for one or more years. The State agency must identify the uses of funding for State or local projects and show that the funding will remain under its administrative control when coordinating activities with other organizations. The State Agency must inform FNS by the end of the first quarter of each Federal fiscal year (December 31) of any portion of its prior year allocation that it cannot or does not plan to spend for SNAP-Ed activities by the end of the Federal fiscal year.

Federal Financial Participation and Allocation of Grants

SNAP-Ed grants have the following characteristics:

- Require no State contribution or match
- Are available each fiscal year and have a 2-year period of performance
- Are the only source of Federal SNAP funds available for SNAP-Ed activities
- Will not cover costs incurred in excess of the SNAP-Ed grant amount

From 2018 and beyond, SNAP-Ed funding allocation is 50 percent based on a State's FY 2009 SNAP-Ed expenditures, and 50 percent based on the State's share of national SNAP participants for the previous 12-month period ending January 31. The amount is also adjusted to reflect any increases in the Consumer Price Index for All Urban Consumers published by the Bureau of Labor Statistics of the Department of Labor for the 12-month period ending the preceding June 30th.

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

FNS strongly encourages States to spend the entirety of their SNAP-Ed allocations and to spend prior year funding before beginning to spend current year funds. Per 7 CFR 272.2(d)(2)(x)(F), a State agency must notify FNS by the end of the first quarter of each Federal fiscal year (December 31) if it will not or cannot spend any portion of its prior year allocation, in which case FNS may recover the unobligated, unexpended funds. FNS may reallocate these funds to other participating State agencies that have

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approved SNAP-Ed Plans during that fiscal year or the following fiscal year. Funds surrendered by a State will be removed from its base 2009 allocation, which is used to determine the next fiscal year funding allocation. The reallocated funds received by a State will be added to its base 2009 allocation for the next fiscal year to determine allocation.

Fiscal Recordkeeping and Reporting Requirements

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

1. **7 CFR 277.11(c), SF-425, Federal Financial Report:** This quarterly report captures the State agency's expenditures of Federal SNAP-Ed funds during the report quarter, and the amount of obligations for SNAP-Ed costs that remain unliquidated at the end of the report quarter. This report is submitted quarterly, 30 days after the end of each quarter. An annual report is due 90 days following the end of the Federal fiscal year.
2. **7 CFR 272.2 (d)(2)(xi-xiii), Fiscal Recordkeeping, Reporting Requirements and SNAP-Ed Annual Report: New:** When implemented for FY 2023, the national electronic data collection system will streamline SNAP-Ed annual reporting in one report due January 31. The system will capture the numbers of SNAP-Ed participants, their characteristics (such as ages, racial/ethnic identities, etc.), the types of SNAP-Ed services provided, intervention characteristics, partnerships developed, project outcomes and expenditures for the prior year, to determine whether SNAP-Ed goals are met. **End of new materials.**
3. **7 CFR 272.2 (d)(2)(ix), Unobligated Funds Report:** The State must inform FNS by December 31 if and how much of its prior year allocation it cannot or does not plan to obligate or expend for SNAP-Ed activities by the end of that Federal fiscal year.
4. **7 CFR 272.1 (f), Record Retention:** SNAP regulations require that all records be retained for 3 years from fiscal closure.

Allowable Costs

How can a State agency determine if costs are allowable?

Allowable costs are those for which FNS will reimburse the State agency that incurred them. To be allowable, a cost must:

1. Support an activity within the scope of SNAP-Ed, included in an approved SNAP-Ed State Plan
2. Conform to Federal Government-wide and SNAP-specific cost principles
3. Conform to Government-wide and SNAP-specific rules for specific items of cost

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

The most fundamental Federal cost principle is that a cost must be necessary and reasonable for the performance of the Federal program or program component in order to be reimbursable from Federal funds. A cost that supports an activity that is outside the scope of SNAP-Ed is unallowable, even if it otherwise conforms to the Federal cost principles. To be allowable, all costs charged to SNAP-Ed must be valid obligations of the State, local government or other sub-grantee, and must support activities described in an approved SNAP-Ed Plan. The diversity of SNAP nutrition education and obesity prevention activities makes it impossible to compile a comprehensive listing of all allowable and unallowable costs. FNS will make all final judgments on what activities support the delivery of SNAP-Ed. As examples, such activities may include, but are not limited to, the following:

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

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

1. Medical nutrition therapy. [APPENDIX E, MEDICAL NUTRITION THERAPY](#)
2. Providing SNAP-Ed services to persons not eligible for SNAP-Ed.
3. Clinical health assessments of SNAP-Ed eligible individuals. Such assessments include the measurement of cholesterol, blood glucose, or iron levels.

What Federal cost principles apply to SNAP-Ed costs?

The Federal cost principles identify certain criteria that an allowable cost must satisfy. These criteria include, but are not limited to, the following:

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

Reasonable costs:

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

Necessary costs:

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

Areas that, in general, fall outside the Agency's "reasonable and necessary" criteria and would not be allowed include funding for infrastructure changes, like purchasing capital equipment or building sidewalks. Organized efforts to influence elected officials or

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lobbying for legislative/policy changes are not considered reasonable or necessary for SNAP-Ed. Initiatives that include educating policymakers can be appropriate.

2 CFR 200.405, Allocable Costs: A cost is allocable to SNAP-Ed if the goods or services involved are chargeable (assignable) to SNAP-Ed in accordance with the relative benefits obtained by the SNAP-Ed program. If a cost item benefits only SNAP-Ed, then 100 percent of it is allocable to SNAP-Ed. If a cost benefits multiple programs or activities, a portion of the cost is allocable to each program. The portion allocated to SNAP-Ed must be proportionate to the benefit SNAP-Ed received.

2 CFR 200 Appendix IV (4), Prorating Costs

A broader audience may benefit from a nutrition education effort whose cost is otherwise allowable under SNAP-Ed. In this case, FNS may allow prorated costs that reflect SNAP-Ed's proportionate share of the total cost. The calculation of SNAP-Ed's share of the total cost is based on the number of the SNAP-Ed eligible individuals that will receive the activities relative to the total population to be reached. For example, if a SNAP-Ed project will reach 100 persons and 20 of these persons are SNAP-Ed eligible, then 20 percent of the total costs may be counted as SNAP-Ed costs. FNS will consider other reasonable methodologies that States describe in their SNAP-Ed Plans for determining the proportion of the SNAP-Ed target audience that will be reached.

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

States must show how prorated costs were calculated, fully describe the nature of such costs, and demonstrate the value of the proposed activity to SNAP-Ed. Since activities that target general audiences are often not designed with the needs of the SNAP-Ed target audience in mind, the State must justify how the activity is a good vehicle for reaching the SNAP-Ed audience and influencing their nutrition-related behaviors.

Costs Requiring Prior Approval in SNAP-Ed

Expenditures for Capital Equipment. The State agency must obtain prior Federal approval before procuring or requesting payment for equipment valued at more than \$5,000 per item. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous years' equipment purchases for the same project. Inventory records must be maintained for equipment that is paid for with Federal funds. A physical inventory is required, and the results must be reconciled with property records, at least once every 2 years or more often.

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Costs Related to State SNAP-Ed Plan Amendments. Should a State agency make changes to a SNAP-Ed Plan, the State must submit a Plan amendment for Federal approval prior to incurring the related expenses in order to ensure that costs meet all criteria for allowability. Further, if the scope of the activities in a Plan change, regardless of the impact on the planned expenditures, a State must submit a Plan amendment for FNS approval as required by 7 CFR 272.2(d)(2). See instructions regarding *PLAN AMENDMENTS* in the *GUIDELINES FOR DEVELOPING THE SNAP-ED PLAN*.

Where are the Federal cost principles located?

Additional guidance can be found at the following sources:

OMB Guidance:

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

USDA departmental regulations:

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

Program-specific guidance:

- SNAP regulations at 7 CFR 277

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

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

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

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Federal minimum hourly wages established by the United States Department of Labor.

- The wages and salaries shall be commensurate to the task an individual is actually performing for SNAP-Ed, as opposed to reflecting other positions for which he/she is credentialed. For instance, if a doctor or physician is teaching a SNAP-Ed course as a Nutrition Classroom Educator, pay will be commensurate with the activity of nutrition education in a classroom rather than that of a physician.
 - Staff must record time as specified in this Guidance and the underlying regulations and OMB circulars. For more information, see [DOCUMENTATION OF STAFF TIME AND EFFORT IN THE FINANCIAL AND COST POLICY SUPPLEMENT](#) following this section.
- *Office equipment, supplies, postage, and duplication costs* that are necessary to carry out the project's objectives
- *Charges for travel necessary to fulfill the approved Plan.* The travel must conform to official State, local, or agency travel regulations. Allowable travel costs are subject to restrictions, such as prohibiting the charging of commercial airfare in excess of coach or its equivalent. For more information, see [COST OF TRAVEL AND CONFERENCE ATTENDANCE](#) in the [FINANCIAL AND COST POLICY SUPPLEMENT](#) following this section.
- *Development and production of SNAP-Ed materials* when no other appropriate materials exist.
- *Memberships, subscriptions, and professional activities.* Costs of institutional memberships in technical and professional organizations necessary to effectively implement an approved State SNAP-Ed Plan are allowable. Costs of individual memberships in such organizations for personnel that work in SNAP-Ed are not allowable. Professional registration or license fees paid by individuals are unallowable costs because the fees would be considered personal expenses, not institutional expenses.
- *Lease or rental costs*
- *Maintenance and repair expenses*
- *Indirect costs.* See [INDIRECT COSTS](#) in the [FINANCIAL AND COST POLICY SUPPLEMENT](#) following this section
- *Nutrition Education Reinforcement Materials (NERI).* See [NUTRITION EDUCATION REINFORCEMENT MATERIALS](#) in the [FINANCIAL AND COST POLICY SUPPLEMENT](#) following this section
- *Cost of using publicly-owned building space.* Includes depreciation based on the building's original acquisition cost, and such building-related costs as maintenance and utilities; must not include costs of maintenance, utilities, etc. directly if they are already charged as indirect costs.

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What administrative expenses are not allowable for SNAP-Ed?

Unallowable administrative expenses include, but are not limited to:

- **Advertising and public relations:** Costs incurred to publicize the organization, as opposed to SNAP-Ed activities, are unallowable, except when incurred for SNAP-Ed social marketing campaigns, recruitment of staff, acquisition of material for the grant, or publishing the results or accomplishments of the grant.
- **Alcoholic beverages**
- **Bad debts:** Includes losses represented by accounts or claims written-off as uncollectible and related costs. The related costs associated with delinquent debts for which the State continues to pursue collection are allowable.
- **Contingencies:** Contributions to an emergency reserve or similar provision for events whose likelihood or magnitude cannot be forecast with certainty. These are not insurance payments, which are allowable.
- **Contributions and donations:** Usually these are political in nature.
- **Entertainment:** Costs that are primarily for amusement or social activities. 2 CFR 200.438 states that entertainment costs are unallowable “except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.” One example of this could be meals as provided during SNAP-Ed staff training events (see [COSTS OF TRAVEL AND CONFERENCE ATTENDANCE](#) within [ADMINISTRATIVE EFFORTS](#)). Other related costs require a “reasonable judgment” based on program purpose and why/when the activity takes place.
- **Fines and penalties:** Includes fiscal penalties, damages, and other settlements resulting from failure to comply with Federal, State, Tribal, local or Foreign laws and regulations.
- **General government costs:** Include costs of the Governor’s Office, the State Legislature, the Judiciary, etc. While such costs are generally unallowable, some may be charged as direct costs to a Federal grant if they clearly benefit that grant. For example, if a person assigned to the Governor’s Office devotes 100 percent of his/her time to SNAP-Ed, the cost of his/her compensation may be allowable. Each situation must be judged on its own merit.
- **Goods and services for private use**
- **Indemnification:** Payments to third parties and other losses not covered by insurance.
- **Lobbying**

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- **Losses not covered by insurance:** See Indemnification above. These costs are similar, but not the same.
- **Medical equipment:** Used in clinical health assessment.
- **Pre-agreement costs:** Costs incurred prior to the effective date of the grant award are unallowable unless approved in advance by FNS.
- **Under recovery of costs under Federal grants:** A shortfall in one Federal grant cannot be recovered by charging it to another Federal grant. This is not the same as charging two Federal grants for a share of the costs of the activity if both funding agencies benefit from the activity funded. However, an allocations basis must be established for sharing the costs in proportion to the benefit each receives.
- **Volunteer services:** Under 7 CFR 277.4(e), the value of volunteer services does not represent any State expenditure or outlay, is therefore not a program cost, and is unallowable.

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

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

Federal Royalty Rights

Under 2 CFR 200.315, FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use, or authorize others to use videos, photocopies, illustrations, computer programs such as DVDs, CD-ROMs, and related source codes, literature, or other products produced with SNAP funds for Government purposes.

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The State and local agencies may sell videos, photocopies, illustrations, or literature to other States for SNAP-Ed purposes at the cost of reproduction, plus shipping and handling. If a State agency or local agency realizes Program Income from the sale of nutrition education materials such as videos, literature, etc. paid with Federal dollars, it shall report the amount to FNS as program income on the SF-425 form.

Any program income earned through the sale of print and audiovisual materials produced under the grant must be used to reduce the cost of the grant to FNS. The gross amount of program income may be reduced by the cost of producing that income. For example, re-production costs may be deducted from the gross amount of program income.

Partnering With Health Care Organizations

Financial Considerations

The allowability of this type of partnership for the delivery of SNAP-Ed depends on whether the organization is public or private. The organization's profit or non-profit status is not relevant. There are three areas to consider carefully when initiating a new contract or managing an existing SNAP-Ed program that utilizes a health care organization:

1. Procurement regulations in some States or counties prevent awarding a contract to a private health care organization without a public notice allowing other health care organizations an opportunity to bid on the work. In addition, once a grantee moves beyond using other governmental services, procurement requirements become mandated. These include items such as the method of procurements and dollar limits.
2. While the nature of a public health care organization may mean that SNAP participants and eligible households will be involved, the health care organization should still validate that it meets target audience categories described in this Guidance. Additionally, the health care organization should meet the provisions of allowable SNAP-Ed activities, i.e., health promotion and primary prevention of disease should be the focus and aim of SNAP-Ed activities. The purpose of public health care organizations is generally for secondary prevention and medical nutrition therapy, which are not allowable SNAP-Ed expenditures.
3. Private, non-profit health care organizations receive the majority of their funding from Medicare/Medicaid. Costs of activities funded under one Federal grant may not be billed to another Federal grant. Unless the State involved is dedicated in tracking these expenditures, it could be difficult in this environment to clearly document costs and ensure they are charged to the correct grant or other cost objectives.

Potential Partnerships with Non-Profit Hospitals

SNAP-Ed focuses exclusively on community-based, non-medical primary prevention, while health care providers, hospitals and insurance systems typically provide secondary and tertiary prevention. Secondary prevention focuses on individuals by

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

Increasingly, large health systems are focusing on primary prevention as a means of slowing the rise of health care costs and preventing readmissions. The Affordable Care Act (Section 9007) community health benefits provision links hospitals' tax-exempt status to the development of a triennial needs assessment and implementation strategy. This provision applies to not-for-profit hospitals that seek Federal tax-exempt status. As a result, FNS encourages States to seek opportunities to partner with these hospitals for their support of SNAP-Ed Plans and activities.

SNAP-Ed providers may identify opportunities for sustainable partnerships with these groups to identify and implement evidence-based interventions and evaluations for low-income populations. For example, hospitals' community benefit programs can cover costs of gardening project infrastructure and equipment or community meals beyond what is allowable for SNAP-Ed. Hospitals and clinics can become sites for summer meals, or pop-up or mobile farmers markets for SNAP-Ed PSE projects. For more information on this process States may refer to CDC's Resources for Implementing the Community Health Needs Assessment Process <http://www.cdc.gov/chinav/index.html> and New Requirements for 501(c)(3) Hospitals Under the Affordable Care Act https://www.irs.gov/charities-non-profits/charitable-organizations/new-requirements-for-501c3-hospitals-under-the-affordable-care-act?_ga=1.49972196.378713778.1477075620.

Partnering With School Wellness Programs

The Child Nutrition and WIC Reauthorization Act of 2004 (Pub. L. 108–265), required each local educational agency (LEA) participating in the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP) to establish a local school wellness policy by School Year 2006. Local school wellness programs are intended to empower local communities to work together to promote and reinforce healthy eating and lifestyle behaviors. SNAP-Ed helps contribute to community health and wellness goals by providing and supporting nutrition education and obesity prevention services within eligible schools and other eligible venues. These activities help low-income students and their families make healthy eating and physical activity-related decisions in accordance with the DGA and MyPlate. While SNAP-Ed may pay for activities directed to the SNAP-Ed target audience, it is not within its scope to pay for local initiatives that are directed to the entire community. Such initiatives are the financial responsibility of the community.

The Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 Proposed Rule would require all LEAs participating in the NSLP and/or the SBP to meet expanded local school wellness policy requirements, establish the

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framework for the content of these policies, ensure stakeholder participation in the policy development, and require periodic assessment of compliance and reporting on the progress toward achieving wellness policy goals¹⁰. The rule also requires LEAs, as part of the local school wellness policy, to implement policies for the marketing of foods and beverages on the school campus during the school day consistent with nutrition standards. LEAs are encouraged in the rule to include SNAP-Ed coordinators and educators among others on local school wellness policy committees. Many SNAP-Ed providers already provide nutrition education in classrooms and may be able to broaden the reach of a school's local school wellness activities through SNAP-Ed collaborative efforts with other publicly or privately funded national, State, and local nutrition education and health promotion initiatives and interventions. Working within school wellness policy committees affords opportunities for SNAP-Ed providers to expand the scope of the activities conducted in the school setting using PSE efforts.

SNAP-Ed providers may participate on — but not lead — school wellness committees. Leadership in developing, implementing, maintaining, and enforcing the local wellness policy remains the responsibility of the LEA. SNAP-Ed providers may offer consultation on strategies that will help schools become community nutrition and wellness hubs. Examples of other school wellness policy committee activities for which SNAP-Ed providers may contribute expertise and/or funds to assist in:

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

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

States are reminded that SNAP-Ed funds may not be used for school-based food service activities including school meals preparation and distribution, paying food service workers, or any efforts focused on implementing new meal patterns for reimbursable meals or snacks.

¹⁰ Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 Proposed Rule, February 26, 2014

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SNAP-Ed might be able to assist in some areas of school food service, as long as the SNAP-Ed rules are followed. For example, SNAP-Ed might be able to help train school food service personnel in culinary techniques to support healthy eating; such as reducing sodium, preparing fruit and vegetables, or promoting students' participation in developing and taste testing healthy menu items, if such expenses do not duplicate other FNS program and are targeted at SNAP-Ed eligible populations.

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

More Examples of Allowable and Unallowable Costs

Literature/Materials/Audiovisuals

Allowable

- The nutrition education/promotion materials that address SNAP-Ed topics and are for use with or distribution to the SNAP-Ed audience.
- The purchase of other nutrition education materials, when there are no FNS or CNPP materials available, that address SNAP-Ed topics and will be used with or distributed to the SNAP-Ed target audience.
- The production of State SNAP-Ed materials, for which no other comparable materials exist that support the State's goals and objectives for SNAP-Ed and will be used with or distributed to the SNAP-Ed audience. States are encouraged to collaborate with other FNS programs on the messages conveyed in SNAP-Ed materials and in sharing the production costs.

Unallowable

- Costs for any nutrition education materials that have already been charged to another Federal or private program or source.
- Any material that endorses or promotes brand name products or retail stores. If a State or implementing agency chooses to use an evidence-based curriculum or validated evaluation tool that includes brand name products as illustrations, the agency must blur or otherwise obscure brand names and clearly identifiable logos.
- Manufacturer or store (cents off) coupons.
- Purchase or production of written or visual material for purposes of lobbying or influencing Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum, or initiative.
- Purchase or production of written or visual nutrition education messages that are not consistent with the current DGA and MyPlate.

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Social Marketing Programs

Allowable

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

Unallowable

- Social marketing that targets the general population. In some instances, prorated costs based upon the number of the SNAP-Ed target audience that will be reached with the campaign may be allowed. FNS may consider alternate methods with justification.
- Publication or dissemination of nutrition education and obesity prevention messages that are inconsistent with the current DGA and MyPlate
- Television and radio announcements/advertisements that contain messages about SNAP, its benefits, and how to apply.

Equipment

Allowable

- Purchase of office equipment. A State can donate equipment and use fair market value. However, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment.
- Equipment shared with non-SNAP users when cost-shared with those users or used by non-SNAP users when not needed for SNAP-Ed purposes as long as such use is incidental.
- Kitchen appliances, only with justification of need.
- Cell phones may be purchased for staff who work predominantly in the field, or away from a desk location with a land line. Cell phone purchases should be limited, and efforts to share cell phones among staff only as needed for remote

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work are encouraged. If a cell phone is purchased for staff that works on multiple grants, a cost allocation plan for the cell phone is required. Cell phones are “theft sensitive” items and should be kept under close watch. Requests for cell phones must be approved in advance by the FNS regional office.

- Tablets/iPads are to be used for program delivery purposes, such as delivering nutrition education or collecting data for evaluation. Tablets/iPads must be shared with all staff that works remotely in the field. Devices must be checked out and returned according to the non-Federal entity’s existing policies. Tablets/iPads are “theft sensitive” items and should be kept under close watch, and reasonable security measures must be developed if participant information is collected. Requests for tablets/iPads must be approved in advance by the FNS regional office.
- A one-time purchase of a Wi-Fi hotspot to support tablet/iPad function is allowable.

Unallowable

- Expenditures for equipment that exceeds prior approval thresholds, i.e., \$5,000 per unit, unless prior approval is received from FNS.
- Medical equipment except for inexpensive equipment such as anthropometric measuring tools that can be used to measure height and weight to determine and discuss BMI and calorie balance/physical activity.
- Purchases of cell phones and tablets/iPads without prior approval from the FNS regional office.
- Purchases of tablets/iPads for purposes other than program delivery or data collection for evaluation.

Food Samples, Supplies, and Provisions

Allowable

- Cost of food for recipe/taste testing purposes.
- Cost of kitchen equipment and supplies necessary for food storage, preparation, and display of food prepared for demonstration purposes.
- Food samples associated with educational lessons.

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

Unallowable

- Ongoing snack or food service.
- Meal sized portions or complete meal service.

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- Cost of food provided as groceries or supplemental food.

Nutrition Education and Obesity Prevention

Allowable

- Classroom setting (salaries, space, equipment, materials) for SNAP Ed audience. Primary purpose of class shall be to provide nutrition and obesity prevention education. If nutrition and obesity education is included with other topics, only that portion of class pertaining to these topics is an allowable cost.
- Physical activity demonstration, promotion, and referral that includes a nutrition-related message based on DGA connected to the intervention.
- Classes on calorie balance (nutrition and physical activity) to manage weight consistent with the DGA.
- Activities that assist in advancing a nutrition education or obesity prevention-related community or environmental change for the low-income population.
- The pro rata share of costs of classes that are provided in conjunction with another program, such as WIC, provided the State agency describes the method for allocating costs between the programs.
- Breastfeeding education, promotion, and support which is coordinated with WIC and which supplements and complements WIC services, rather than duplicating or supplanting them.
- Messages that teach how to compare ingredients and nutrients among foods and beverage products.
- Diabetes prevention education, promotion, and support that focuses on obesity prevention and is coordinated with multi-level interventions and/or public health approaches.
- Nutrition and food safety education for individuals impacted by disasters and eligible for the Disaster Supplemental Nutrition Assistance Program (D-SNAP).

Unallowable

- Classes that are designed to provide case management or “life skills” training such as classes on English as a second language, parenting, child development, crisis management, rental information
- Medical nutrition therapy and secondary prevention interventions. [APPENDIX E, DEFINITIONS](#)
- Weight loss classes specific to individuals, individualized meal plans, obesity treatment programs, etc.

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- Gym memberships, trainers, gym equipment, or facilities. [APPENDIX E, PHYSICAL ACTIVITY](#)
- Clinical health screening (i.e., cholesterol testing, and blood glucose testing, etc.).
- Distribution of nutrition education and physical activity reinforcement items costing over \$5.00 each.
- Nutrition education costs that are charged to another Federal program such as WIC, EFNEP, Head Start.
- Breastfeeding education, promotion, and support that duplicates or is provided through WIC, EFNEP, or Head Start funding.
- Education provided to incarcerated or institutionalized persons who are not eligible for SNAP.
- SNAP-Ed activities delivered to most able-bodied students, ages 18 through 49, enrolled in college or other institutions of higher education at least half time. For information on students that may be eligible: <https://www.fns.usda.gov/snap/students>

Space Allocation

Allowable

- Space allocated to SNAP-Ed and other programs under a plan whereby the method of space/cost allocation between programs is documented and the costs are tracked.
- Space donated by local school districts, but only the cost of the space based on depreciation.

Unallowable

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

Staff and Training Costs

Allowable

- SNAP-Ed-related training for program delivery staff
- Staff time spent delivering nutrition education and obesity prevention activities to the SNAP-Ed target audience. Time must be charged at a rate commensurate with the duties being performed.
- General briefings to community health care providers serving low-income communities about food insecurity assessments and SNAP-Ed activities in the community

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- Compensation for State agency staff to plan, oversee, and/or monitor the use of SNAP-Ed funds
- **New:** Training for State agency staff on SNAP-Ed programs and services, so that they can maximize notification of SNAP-Ed availability to participants and applicants. **End of new material.**
- Orientation of school, child care, or appropriate worksite food service staff on collaborative PSE change efforts.

Unallowable

- The time volunteers of a non-public agency, e.g., faith-based organizations, many food banks, etc. spend performing SNAP-Ed specific duties.
- A physician's or other professional time spent conducting SNAP-Ed activities when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing.
- University courses that are not relevant to the practical delivery of SNAP-Ed to the SNAP-Ed target population.
- Training or development costs of food service workers or others not directly associated with delivery of SNAP-Ed.

Policy, Systems, and Environmental Changes (PSEs)

Allowable

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

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- Resource kits with strategies for adopting, implementing, maintaining, and evaluating policy, systems, and environmental changes.
- Consultation with partner organizations on measures to address and reduce food waste and maximize utilization and consumption of available healthy food resources.

Unallowable

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

Costs Associated with Other Activities

Allowable

- Reimbursement for personal costs such as childcare, meals, lodging, and transportation for recipients of SNAP-Ed to actively participate in focus groups, needs assessment, and advisory groups to inform and improve SNAP-Ed effectiveness. Allowable costs for focus group participants are intended to reimburse for incurred costs, not to provide a financial incentive for participation.
- If reimbursement is given in the form of a gift card, it is recommended that the reimbursing organization issue gifts cards restricted from alcohol, tobacco and gambling purchases.
- Interventions that promote the selection of healthy foods from vending machines.
- Participation on relevant nutrition education and obesity prevention related State and local advisory panels focusing on the interests of the SNAP-Ed target audience.

Unallowable

- Organized efforts to influence elected officials and lobbying for legislative/policy changes.

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- Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely SNAP-Ed population.
- Money, vouchers, or passes provided to SNAP-Ed recipients to offset personal costs incurred so that they may attend nutrition education and obesity prevention classes, e.g., for childcare and transportation expenses.
- Childcare or transportation services provided for SNAP-Ed recipients in conjunction with SNAP-Ed activities.

Financial and Cost Policy Supplement

Costs Associated with Program Efforts

Physical Activity

THE 2018 PHYSICAL ACTIVITY GUIDELINES FOR AMERICANS (<https://health.gov/our-work/nutrition-physical-activity/physical-activity-guidelines/current-guidelines>) provide Guidance to help Americans improve their health through appropriate physical activities. FNS encourages States to include the related *2020-2025 DIETARY GUIDELINES FOR AMERICANS (DGA)* key recommendation, to meet the Physical Activity Guidelines for Americans, in the SNAP-Ed Plans. Efforts to improve the health and fitness of program participants could include:

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

The provisions of 2 CFR 200 Subpart E allow FNS to make reasonable judgments as to what is necessary and reasonable to deliver SNAP-Ed. Section 4028 of the 2014 Farm Bill (Public law 113-79) reinforced the physical activity dimension of SNAP-Ed by inserting “and physical activity” into section 28(b) of the FNA. This action recognizes physical activity promotion as an integral part of SNAP-Ed. Costs incurred for that purpose are allowable, subject to the following guidance.

Allowable costs include activities that educate participants and promote physical activity, such as providing the SNAP-Ed audience with information and encouragement to make physical activity part of their lifestyle. Allowable purchases may include inexpensive physical activity equipment such as stability balls, hand weights, jump ropes, and hula-hoops to use in ongoing physical activity in conjunction with nutrition education provided to the low-income target audience. States should consult their Regional SNAP-Ed Coordinator about reasonable physical activity-related interventions for SNAP-Ed.

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The following form the basic principles of SNAP-Ed policy on physical activity:

- Educational and program materials developed to promote and reinforce physical activity for all target audiences should include messages that link nutrition and physical activity, and explain the associated health benefits of active lifestyles.
- All programming such as workshops, conferences, and trainings for SNAP-Ed that encourages physical activity also should include promotion of healthy eating patterns. Activities may include physical activity demonstration for the SNAP-Ed audience and training for staff to develop skills to help SNAP-Ed participants.
- FNS program State and implementing agencies may use nutrition education funds to develop nutrition education and physical activity material that is reasonable and necessary for SNAP-Ed purposes. Physical activity materials should include a nutrition education message that promotes healthy eating and link nutrition with physical activity. FNS encourages the use of existing materials, especially existing FNS and CNPP materials, and ones available through the SNAP-Ed Connection, CDC, and other Federal Government agencies. Using or adapting successful interventions developed by others is preferable to developing new materials.
- FNS program State and implementing agencies are encouraged to coordinate with community, faith-based, youth, recreational, and other organizations, whose primary mission is to make regular opportunities for physical activity accessible and actively promote and coordinate such activities.
- FNS encourages PSE interventions that promote and support physical activity.

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

Examples of unallowable costs include, but are not limited to, costs incurred for:

- Health club, gym, or fitness class membership fees
- Large expenditure equipment (e.g., bicycles, treadmills, ellipticals, weight sets, etc.)
- Facilities (rental or modifications)
- Instructors for continuing exercise classes.

Examples of Acceptable Physical Activity Education and Promotion Costs

SNAP State agencies may make physical activity education and promotion coupled with nutrition education available to the SNAP-Ed audience in a variety of ways. States may develop or adapt existing educational materials to teach physical activity concepts coupled with nutrition-related messaging or collaborate with partners on physical activity PSE change efforts in schools, childcare, or communities as examples.

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

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

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

Gardening

Food-based gardening is a beneficial activity that leads to the economical production and consumption of healthy and fresh food. **New:** Gardening projects funded by SNAP-Ed are intended to serve schools and communities eligible for SNAP-Ed, to teach food gardening and promote physical activities benefits of gardening. They are not meant to create gardens whose primary purpose is to donate food into the emergency food system.

Costs for the rental or purchase of garden equipment (tractors, rototiller, cultivator, etc.) or the purchase or rental of land for garden plots are not allowable. The purchase of non-edible plants and items used for non-edible pollinator gardens are not allowable

The purchase of seeds, plants, small gardening tools and supplies such as fertilizer and potting soil to assist in developing school and community food gardening projects are allowable SNAP-Ed costs. These costs should be done in partnership with other funding mechanisms to ensure sustainability of the project. **End of new material.** Educational supplies, curricula, and staff salaries to teach food gardening concepts that reinforce the beneficial nutrition and physical activity aspects of food gardening are allowable costs.

Staff salaries to establish and maintain community food gardens, such as in low-income housing projects or schools may be allowable but should be submitted to FNS for prior approval. Provision of time for food garden maintenance is an example of an opportunity for community participation in addition to SNAP-Ed funding. Participants may use program benefits to purchase seeds and plants for individual food gardening purposes.

FNS encourages State agencies to coordinate with the Federal, State, local, and private initiatives that create sustainable food gardens as PSE efforts to benefit schools and communities through collaborative efforts. SNAP-Ed providers can play an instrumental role in community food gardening for the low-income population. More information about community gardening is available here:

<http://www.cdc.gov/healthyplaces/healthtopics/healthyfood/community.htm>

New: It is a requirement that all SNAP-Ed garden activities include nutrition education at the gardening site. This can include indirect education channels, but direct education at the gardening site is recommended. **End of new material.** For sites where this is logistically infeasible, and/or in sites not located in low-income communities, where

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produce is being distributed at a partner site serving SNAP-Ed eligible individuals and families, nutrition education must be provided at the point of distribution. Nutrition education should be related to the produce being distributed from the garden, and inclusion of information about gardening and health is recommended.

All efforts should be taken to establish community garden sites in areas where they are easily accessible for SNAP-Ed eligible individuals. In rare instances other sites may be approved, though we leave this to regional discretion to approve based on the rationale provided for the site – the rationale should be thoroughly documented and reasonable to your judgment.

If a State intends to implement this type of intervention, their nutrition education efforts must be evaluated. Some State and local agencies have only evaluated pounds of food distributed and volunteer contributions, and this is not sufficient for SNAP-Ed.

Farmers Markets

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

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

Note that SNAP-Ed funds may not be used to provide the cash value of financial incentives nor the cost EBT equipment, but SNAP-Ed funds can be used to engage farmers markets and retail outlets to collaborate with other groups and partner with them.

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

Breastfeeding

All SNAP-Ed activities that address the topic of breastfeeding must be planned and implemented in collaboration with the State WIC agency and State Breastfeeding Coordinator. The WIC Program should have the lead and primary role in all

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

Nutrition Education Reinforcement Materials

New: Nutrition education reinforcement materials refer to products given to the SNAP-Ed audience or those closely associated with SNAP-Ed and are meant to reinforce the objectives of the education provided to the participants. These items must have a direct relationship to the desired nutrition or physical activity behavior change, and are not meant to be provided just as an incentive. **End of new material.** Terms used to describe these items include enhancement items, home reinforcements, and educational extenders. Such items are allowable costs only if they are reasonable and necessary, contain or reinforce nutrition and physical activity messages, and are of nominal value.

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

- Have a clear, relevant, and useful connection to particular FNS/SNAP nutrition education or obesity prevention messages.
- Contain an educational message or have a use that is directly relevant to reinforce behaviors among the SNAP-Ed target audience.
- Have nutrition education and obesity prevention messages.
- Have value as nutrition education and obesity prevention aids, for example measuring cups to determine portion size or pedometers to track physical activities.
- Be offered only after weighing and assessing other relative needs and cost effectiveness.
- Be of nominal value of \$5.00 or less per item.
- Not be used solely for marketing or staff morale boosters.

If the reinforcement material is designed for physical activity promotion, it should be provided in conjunction with relevant nutrition and physical activity messages. Items that would be considered not allowable include:

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- Celebratory items and items designed primarily as staff morale boosters.
- Items that are not reasonable or necessary and/or have no nutrition education message.
- Any program reinforcement item intended for persons who are not SNAP-eligible or potentially SNAP-eligible.

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

Administrative Efforts

College and University Students

Scholarships and Tuition

2 CFR 200.466 makes a distinction between scholarships, fellowships and other similar financial transactions, and tuition remission and similar work/study payments. For scholarships, costs may only be charged if (1) the purpose of the scholarship is for training of selected students, and (2) approval is granted by the grantor agency. There would need to be a necessary and reasonable judgment for approval of any scholarship payment shown as a cost to SNAP-Ed. In general, this is not a necessary and reasonable cost for the purposes of SNAP-Ed.

In the event the scholarship is based on research activity, FNS would normally not accept the cost as being necessary and reasonable. The primary function of SNAP-Ed is teaching nutrition education to the SNAP-Ed target audience. While basic research may be a commendable activity for developing new methods or data, it is beyond the basic purpose of this grant.

Tuition remission on the other hand may be allowable in whole or in part, depending on the situation. The criteria for approval are:

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

Students who are working on SNAP-Ed under a tuition remission situation shall account for their time, as would any full-time or part-time staff. The financial review of this charge shall take into account both the type of work performed and the number of hours worked. As with any charge, tuition remission can only be charged by the percentage of time that the student or employee worked on SNAP-Ed. If the student is working 50 percent of their time on SNAP-Ed, only 50 percent of the tuition may be charged to

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FNS. Again, a necessary and reasonable judgment should be made as to the purpose of the work and its impact on SNAP-Ed.

Documentation of Staff Time and Effort

Time and effort reporting is required by staff (cost share and salaried staff) devoting less than 100% of their time to SNAP-Ed. Employees devoting 100% of their time to SNAP-Ed do not need to maintain weekly time sheets; however semi-annual time and effort certification by a supervisor is required. For personnel activity reporting, States may use methods approved by FNS Regional SNAP-Ed Coordinators to account for time spent working on FNS programs. Time documentation forms must reflect after the fact reporting and may not be completed in advance of the activity and later certified by the employee. Implementing agencies must additionally comply with all State laws and regulations regarding staff time and effort documentation.

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

Standards for documenting Staff time also come from 2 CFR 200.430, which is excerpted below.

(i) Standards for Documentation of Personnel Expenses

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

- (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- (ii) Be incorporated into the official records of the non-Federal entity;
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities (for Institute of Higher Education {IHE}, this per the IHE's definition of Institutional Base Salary {IBS});
- (iv) Encompass both Federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
- (v) Comply with the established accounting policies and practices of the non-Federal entity (See paragraph (h)(1)(ii) above for treatment of incidental work for IHEs.); and
- (vi) [Reserved]
- (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using

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different allocation bases; or an unallowable activity and a direct or indirect cost activity.

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

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

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

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

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

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

For States, local governments, and Indian Tribal Organizations, substitute processes or systems for allocating salaries and wages to Federal awards may be used in place of or in addition to the records described above if approved by the cognizant agency for indirect cost.

State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS Regional Office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy of the time estimate. Time records need not be submitted with the Plan but should be maintained by the project for audit.

Indirect Costs

Indirect cost is a general term for certain types of costs that are incurred by the grantee or sub-grantee in support of other allowable activities that are charged directly to sponsoring Federal or State funding agencies. These indirect costs (also called overhead costs) are determined through a variety of rates or "cost allocation plans" that detail how the costs are to be shared by the funding agencies.

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Indirect cost rates are documented through an indirect cost plan, which is approved by a cognizant agency. A cost allocation plan, also approved by a cognizant agency, is a more extensive plan that combines many different allocations.

Historically indirect cost plans were reviewed and approved by a cognizant agency officially assigned by OMB. Typically, OMB assigned cognizance to the Federal funding agency that had the largest dollar amount involvement with the specific grantee. Within that agency there was an office known as the Division of Cost Allocation or DCA. Due to budget cuts, the DCA no longer reviews or approves indirect costs for sub-grantees. Recently, these costs were claimed without any Federal review. FNS has determined that under the new Uniform Guidance, the primary grantee (normally the State agency) is responsible for review of indirect costs submitted by their sub-grantees. This policy is currently implemented by other Federal agencies, including the Departments of Education, Labor, and Health and Human Services.

FNS will accept indirect costs established through an indirect cost plan approved by the appropriate State agency. We retain the right to review any and all such plans. In the event a State agency has approved a plan that is determined to be unacceptable, indirect costs charged through that plan may be disallowed.

If a cost can be directly attributed to one grant, then that cost may not be included in either an indirect cost plan computation or any cost allocation plan. Indirect cost rates are normally computed through a process where all indirect costs are added together and then divided by the Modified Total Direct Costs. This results in a percentage that is applied to each grant as its share of the indirect or overhead costs. For example, if indirect costs total \$16,000 and the Modified Total Direct Costs total \$100,000, then the indirect cost rate would be 16 percent. Each grant would then be charged 16 percent of the total direct costs chargeable to that grant. In a cost allocation plan, usually meant for a larger grantee, various costs are pooled and then allocated to the various grants operated. Indirect costs may be claimed by grantees for the cost of activities operated by sub-grantees. This would result in two indirect cost rates being applied to the grant. In most cases, the rates are restricted to the first \$25,000 of any flow through grants or contracts. This is provided for in the construction of the Modified Total Direct Costs used in development of the indirect cost rates.

If a grantee has an approved indirect cost plan or cost allocation plan, it should note the indirect cost rate agreement in its SNAP-Ed Plan. FNS may request documentation in support of the submitted indirect cost rate. The State agency should ensure that documentation from either the Federally assigned cognizant agency or the State review process will be available for FNS review if requested.

FNS will accept indirect cost rates for colleges and universities that have been approved by the appropriate cognizant entity. Unless justification is provided, only the off-campus rates may be used. If additional categories such as “other sponsored activities” are covered, FNS will not accept “instructional rates” without justification. In most SNAP-Ed Plans, only one rate may be used for each program charged. As a result, any justification for using either the “on-campus” or “off-campus rate” should be based on where the majority of the allowable activities take place. In the case of SNAP-Ed, the

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allowable activities are defined as those activities that provide nutrition education to the SNAP eligible population. Other activities, such as research and data analysis, are not the primary purpose of SNAP-Ed and should not be used in determining where the majority of the activities take place. Indirect costs at colleges and universities are limited to 26 percent of Modified Total Direct Costs, based on 2 CFR 200 Appendix III.

Small local agencies may not have staff with the expertise to develop indirect cost rates. Local agencies that do not have a cognizant agency to review and approve their rates may apply to the State agency for approval to use a rate developed either by or for the local agency. They may obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs and may be included in the Plan budget as either direct or indirect costs. The State agency should indicate, within the SNAP-Ed plan, its acceptance of the indirect cost rate. The FNS Regional Office may accept or reject use of the rate based on the rate computation documents. If the State agency does not accept the responsibility for approving the indirect cost rate, or disapproves the rate, the FNS Regional Office will not accept the rate.

State agencies are responsible for ensuring that indirect costs included in the State SNAP-Ed Plan are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement.

Cost of Travel and Conference Attendance

Travel expenditures are a variable cost. Per 2 CFR 200.432, a conference is “a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award.” In order to be considered for funding, the request shall provide a direct and clear link to providing quality SNAP-Ed programming for the SNAP-Ed audience. The CFR also states that “Conference hosts/sponsors must exercise discretion and judgement in ensuring that conference costs are appropriate, necessary, and managed in a manner that minimizes costs to the Federal award.” States are reminded that they may use a portion of their SNAP-Ed allocation for State agency travel for the same purpose.

Agencies must provide the following information for all travel included in the SNAP-Ed budget:

Travel Destination: Travel requests should be identified for in-state and out-of-state purposes. States should note the destination of the meeting, training, or conference attendance.

Travel Purpose and Justification

- Justify the purpose of the travel request.
- Describe how attendance is necessary to achieve SNAP-Ed program goals and objectives and how the travel request supports the State’s SNAP-Ed goals and objectives.

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- Demonstrate how information will be disseminated to in-state educators, collaborators, and SNAP office staff.
- Number of staff attending.
- Identify and justify the number and type of staff making the travel request.
 - For attendance at national level conferences, the request should be limited to no more than four (4) staff persons per State. When travel to a national conference is similar in cost to local travel due to locality, States may submit a request to their respective Regional Office for consideration of limited attendance beyond four staff.
 - For attendance at regional conferences or meetings, with attendance invitations limited to a specific area, no more than six (6) staff persons are allowed per State.
 - For attendance at State or local conferences or meetings with attendees limited to persons working within State borders (such as SNAC meetings), no more than eight (8) staff persons are allowed per State.
 - For attendance at any conference held virtually or remotely, additional flexibilities may apply around the maximum number of allowable attendees. Contact your Regional Office if you require specific flexibilities for attending virtual conferences.
 - If the attendance Guidance provided above does not allow you to meet the needs of your SNAP-Ed activities, please contact your Regional Office to determine if an alternative number of attendees is allowable.

Per Diem Rates: The standard State or Federal per diem rates shall be applied. These can be found at <https://www.gsa.gov/travel/plan-book/per-diem-rates>. In addition, all travel restrictions found in the OMB regulations (e.g., no per diem for travel status less than 12 hours, no first-class tickets, etc.) shall be followed. If meals are provided to minimize cost and time lost to local travel for meals, costs must be reasonable and per diem must be reduced for meals provided in accordance with OMB regulations. Additional detail can be found at <https://www.ecfr.gov/current/title-41/subtitle-F>.

Appendix A: SNAP-Ed Plan and Annual Report Modules

New: The following tables provide recommended modules for consistent and streamlined submission of the Plan and Annual Report, which are discussed in detail in *Section 2*. These modules are subject to change. Refer to [APPENDIX E DEFINITIONS OF TERMS](#) for terms used in these templates.

Plan Modules Summary

SNAP-Ed Plan Modules
<p>1: Identify the Target Audiences and Their Needs</p> <ul style="list-style-type: none">• Needs Assessment<ul style="list-style-type: none">– State-Specific Target Population Data– Community Food Access Data– Demographic Characteristics of SNAP-Ed Target Audience– SNAP Participation– Program Access for Diverse Target Audiences– Coordination and Partnerships– Agency/Workforce Capacity• State Priority Goals<ul style="list-style-type: none">– 5 to 7 priority goals based on needs assessment
<p>2: State SNAP-Ed Action Plan</p> <ul style="list-style-type: none">• SMART Objectives• Performance indicators• Projects• Nonproject activities• SNAP-Ed Outreach• Action plan overview
<p>3: Planned Projects</p> <ul style="list-style-type: none">• Brief description• Link to SMART objectives• Approaches (Direct Education, PSE and/or Social Marketing)• Priority Population• Project Outreach• Direct Education and PSE Settings• Social Marketing Campaigns• SNAP-Ed Toolkit Interventions• Other Previously Developed interventions• New Interventions

SNAP-Ed Plan Modules

4: Planned Evaluations

- Evaluation Name
- Project(s) Evaluated
- Evaluation Type (Formative, Process, Outcome or Impact)
- Evaluation Details
 - Component to be evaluated
 - Date range
 - Data collection methods
 - Planned use of results

5: Coordination and Collaboration

- Federal Nutrition, Obesity Prevention, and Health Programs
- Multisector Partnerships/Coalitions
- Indian Tribal Organizations
- Minority-Serving Institutions

6: Planned Staffing and Budget

- Planned Staffing
- Implementing Agency Budgets
- Project Budgets
- Other SNAP-Ed Expenditures
- Other Non-SNAP-Ed Funding
- Travel
- Indirect Cost
- Unobligated Balance from Previous Year
- Total Budget

7: Assurances and Signatures

End of new material.

Appendix A: SNAP-Ed Plan and Report Modules

Staffing Plan Form

Provide the following summary by SNAP-Ed project for all paid staff in the budget. Complete a summary for each project. Provide the Full Time Equivalents (FTE), describe staff responsibilities as they relate to SNAP-Ed, and note the funding amounts that will be paid by State and/or Federal funds. Add rows as needed.

Project Name:

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

Appendix A: SNAP-Ed Plan and Report Modules

Project Budget Form

For each sub-grantee, provide the Federal cost for each planned nutrition project. Provide a detailed breakdown that includes, at a minimum, the information contained in the following table. An Excel version of this form is available online at the SNAP-Ed Connection. Please note the clarification of some cost categories below in order to comply with the Agriculture Improvement Act of 2018.

Federal Fiscal Year:

State: Sub-grantee Name:

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

Signature of Responsible Official: _____

Date: _____

Appendix A: SNAP-Ed Plan and Report Modules

Assurances and Signatures Forms

State Agency completion only: To assure compliance with policies described in this Guidance, the SNAP-Ed Plan shall include the following assurances. Mark your response to the right.

SNAP-Ed Plan Assurances	Yes	No
The State SNAP agency is accountable for the content of the State SNAP-Ed Plan and provides oversight to any sub-grantees. The State SNAP agency is fiscally responsible for nutrition education activities funded with SNAP funds and is liable for repayment of unallowable costs.		
Efforts have been made to target SNAP-Ed to the SNAP-Ed target population.		
Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) are claimed under the SNAP-Ed grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional SNAP-Ed individuals or to provide additional education services to EFNEP clients who are eligible for the SNAP. Activities funded under the EFNEP grant are not included in the budget for SNAP-Ed.		
Documentation of payments for approved SNAP- Ed activities is maintained by the State and will be available for USDA review and audit.		
Contracts are procured through competitive bid procedures governed by State procurement regulations.		
Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB circulars governing cost issues.		
Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.		
Program activities are reasonable and necessary to accomplish SNAP-Ed objectives and goals.		
All materials developed or printed with SNAP Education funds include the appropriate USDA nondiscrimination statement and credit to SNAP as a funding source.		
Messages of nutrition education and obesity prevention are consistent with the Dietary Guidelines for Americans.		

Appendix A: SNAP-Ed Plan and Report Modules

Supplemental Nutrition Assistance Program Annual Plan for SNAP-Ed

State SNAP Agency:

Date:

Federal Fiscal Year:

Certified By:

Date:

SNAP STATE AGENCY FISCAL REVIEWER

Date:

Annual Report Modules Summary

SNAP-Ed Annual Report Modules (for FY2023 reporting)
<p>New: 1: Executive Summary</p> <ul style="list-style-type: none">• Key Successes• SNAP-Ed Activities Review• Reaching the Target Audience
<p>2: Coordination and Collaboration</p> <ul style="list-style-type: none">• Federal Nutrition, Obesity Prevention, and Health Programs• Multisector Partnerships/Coalitions• Indian Tribal Organizations• Minority-Serving Institutions
<p>3: SNAP-Ed Financial Reporting</p> <ul style="list-style-type: none">• Implementing Agency Expenditures• Project Expenditures• Other SNAP-Ed Expenditures• Indirect Cost• Program Income (if applicable)• Unobligated Balance• SNAP-Ed Total Expenditure
<p>4: Project and Activity Results</p> <ul style="list-style-type: none">• Nonproject Activities• Project Results<ul style="list-style-type: none">– Approach– Interventions Used– SNAP-Ed Indicator Measured– Project Sites– Direct Education<ul style="list-style-type: none">▪ Stage▪ Languages▪ Reach (race, ethnicity, gender, age)▪ Mode of delivery▪ Outcome Indicators Results– PSE Initiatives<ul style="list-style-type: none">▪ PSE Change Maintained▪ PSE Change Adopted▪ Active Partners– Social Marketing<ul style="list-style-type: none">▪ Stage▪ Market Segments

Appendix A: SNAP-Ed Plan and Report Modules

SNAP-Ed Annual Report Modules (for FY2023 reporting)

- Reach and Engagement by Channel
- Indirect Channels
 - Language
 - Channel
- Other Results

5: Evaluation Reports

- Introduction
 - Project(s) Evaluated
 - Evaluation Type
- Design and Summary
 - Component(s) Evaluated
 - Data Collection Methods
 - Results and Conclusions
 - Use of Results (citation if applicable)
- Outcome and Impact Evaluation Objectives, Analysis, Results, Conclusions, and Dissemination Plan

6: Major Challenges and Modifications

- Describe major challenges
- Describe how projects and nonproject activities will be modified to address challenges
- What solutions can help prevent or overcome these challenges

7: Success Stories

- Background
 - Title
 - Site(s) or organization(s)
 - Location
 - Activity name
 - Related SNAP-Ed Evaluation Framework Indicators
 - Partners involved
- The Story
 - Activity description
 - Story narrative
 - Favorite quotes

End of new materials.

Appendix B: Supplementary Checklists and Templates

The Checklist for Evidence-Based Approaches and the Checklist for Public Health Approaches were developed by the Western Region and are used by some other Regions. They provide detailed descriptions, steps, and examples that may assist States as they consider approaches for delivery of nutrition education and obesity prevention services.

The [Budget Detail Template](#) developed and used by the Mountain Plains Region is completed in addition to the *BUDGET SUMMARY FOR SUB-GRANTEES* to gather budgetary information in another format. States may wish to contact their Regional SNAP-Ed Coordinators with questions about using these materials.

- Reviewing State SNAP-Ed Plans Checklist
- Checklist for Evidence-Based Approaches
- Checklist for Public Health Approaches
- Budget Detail Template

Reviewing State SNAP-Ed Plans Checklist

Reviewing State SNAP-Ed Plans Checklist

This checklist is used to review SNAP-Ed Plans and may be helpful to consider during the planning process.

Elements considered when reviewing SNAP-Ed Plans:

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

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

Reviewing State SNAP-Ed Plans Checklist

Goals and Objectives	Yes	No
Are the State goals and objectives consistent with SNAP-Ed Plan Guidance?		
Are objectives written in the SMART format?		
Are the key messages included?		
Do the objectives relate to the State goals and objectives?		
Do the activities target the SNAP-Ed target audience?		
Are the activities adequately described?		
Are the activities supported by research?		
Are the activities consistent with Dietary Guidelines for Americans, MyPlate, and the Physical Activity Guidelines for Americans?		
Are materials to be used defined and appropriate?		
Is there justification for development of new materials (if any)?		
Is there a plan to capture behavior change (SNAP-Ed Evaluation Framework indicators)?		
Does the Plan incorporate public health approaches?		
Does the Plan demonstrate a coordinated approach using the SEM?		

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

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

Reviewing State SNAP-Ed Plans Checklist

Staffing	Yes	No
Are administrative FTEs and program delivery FTEs appropriate for described activities?		
Do salaries relate appropriately to the work being performed?		
Is the math in the template, correct?		

Budget	Yes	No
Is there a budget justification for all Implementing Agencies?		
Are costs reasonable and necessary?		
Does the salary line item match the salary total on the staffing template?		
Are indirect costs limited to 26 percent for Federal reimbursement (applies to colleges and universities only)?		
Is an indirect cost rate agreement included?		
Is the math correct?		

Assurances	Yes	No
Are assurances included?		

Checklist for Evidence-Based Approaches

The purpose of this 4-step checklist is to help States and Implementing Agencies meet SNAP-Ed evidence-based program and practice requirements. An evidence-based approach for nutrition education and obesity prevention is defined as “the integration of the best research evidence with the best available practice-based evidence.” Evidence-based allowable uses of SNAP-Ed funds include conducting and evaluating direct education, PSE, and social marketing interventions.

An evidence-based approach may include a mix of strategies (broad approaches to intervening on obesity prevention target areas) and interventions (specific set of evidence-based, behavior-focused activities and/or actions to promote healthy eating and active lifestyles). *THE SNAP-ED TOOLKIT INTERVENTIONS* at <https://snapedtoolkit.org/> contains an interactive listing of peer-reviewed evidence-based interventions at various setting, for various target populations, using the direct education, PSE and social marketing strategies. The Toolkit is the starting point for choosing evidence-based obesity prevention programs for SNAP-Ed.

Categories of Evidence-Based Approaches

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

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

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

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

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

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

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

Checklist for Evidence-Based Approaches

Intervention or Strategy Name:

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

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

Checklist for Evidence-Based Approaches

Step 2	Search for evaluation results for your intervention or strategy with a university or public health partner using the following guidelines.	Yes	No
A	Is there at least one peer-reviewed ¹¹ , scientific journal article that concludes your approach has significant positive impacts on individual behaviors, food/physical activity environments, or obesity prevention policies? Journal, article title, publication date: _____		
B	Was the approach tested and compared against some type of control condition present (e.g., a similar venue or population that does not receive the intervention or strategy) with significant positive effects?		
Notes/Comments (including applicable supporting files to be attached with submission):			

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

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

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

¹¹ Peer-reviewed articles have been critiqued by the author's peers, who are experts in a given field or academic discipline. Articles published in peer-reviewed journals meet standards of excellence in scientific research. Examples of peer-reviewed journals with SNAP-Ed articles include: *JOURNAL OF NUTRITION EDUCATION AND BEHAVIOR* and *PREVENTING CHRONIC DISEASE*.

Checklist for Evidence-Based Approaches

Step 3	Many strategies or interventions have the potential for	Yes	No
A	Does the approach align with the <i>Dietary Guidelines for Americans</i> https://health.gov/our-work/nutrition-physical-activity/dietary-guidelines , the <i>Physical Activity Guidelines for Americans</i> , https://health.gov/our-work/nutrition-physical-activity/physical-activity-guidelines and/or <i>Healthy People 2030 objectives for Nutrition and Healthy Eating</i> https://health.gov/healthypeople/objectives-and-data/browse-objectives/nutrition-and-healthy-eating?		
B	Does the approach reflect the budgetary and time constraints of the low-income population?		
C	Does the approach reflect solutions that would make healthy eating and physically active lifestyles easier and more appealing to SNAP-Ed participants? (Solutions that make healthy choices easier may include changes in food retail, food distribution, or recreation facilities, including hours of operation, price, promotion, placement, marketing, communication, and related operations and policies)		
D	Will the approach be evaluated for changes in individual behaviors, food/physical activity environments, or obesity prevention policies?		
If you answered yes to items A – D, go to item E. Else, your approach is not considered emerging for SNAP-Ed.			
E	Does the approach reflect the social, cultural, and/or linguistic needs and resources of the low-income population(s) served?		
F	Does the approach address the results and implications of a State or community needs assessment?		
G	Does the approach address State or local priorities/strategic plans?		
Notes/Comments (including applicable supporting files to be attached with submission):			
<i>If you answered yes to items E, F, or G (any one of them), your approach</i>			
<u>Designate which category of</u> <hr style="width: 20%; margin-left: 0;"/>			

Checklist for Evidence-Based Approaches

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

Checklist for Evidence-Based Approaches

References:

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

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

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

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

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

Checklist for Public Health Approaches

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

Categories of Public Health Approaches

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

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

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

Checklist for Public Health Approaches

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

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

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

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

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

Checklist for Public Health Approaches

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

Checklist for Public Health Approaches

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

Checklist for Public Health Approaches

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

Examples of Policy Systems, and Environmental (PSE) Approaches

Examples of PSE approaches that complement direct or indirect nutrition education. Check the corresponding box for those that have the potential to fit your project. This list is not exhaustive; please write-in other proposed approaches for review.	Yes	No
Use community or place-based messaging to promote access and appeal for healthy foods, beverages, and/or physical activity.		
Use digital or social media to promote access and appeal for healthy foods, beverages, and/or physical activity.		

Checklist for Public Health Approaches

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

Budget Detail Template

Budget Detail Template

FNS Strongly recommends the use of the Budget Detail Template. The Budget Detail Templates below (Figures B1 – B6) are for illustrative purposes only, please use the fillable Excel version of this template available at the SNAP-Ed Connection at <https://snaped.fns.usda.gov/program-administration/guidance-and-templates>. Template was developed by Mountain Plains Region.

Figure B1. In-State Travel Budget Table.

In-State Travel															
Agency Name: _____															
Fiscal Year: _____															
Trip	# Staff	Staff Positions Travelling	Trip Purpose	Travel Location	# Days	Mileage (Cost per Mile)	Miles Roundtrip	Total Mileage Cost	Lodging Cost per Day	Total Lodging Cost	Per Diem Cost per Day	Total Per Diem Cost	Registration Fee (if applicable)	Total Registration Cost	Total Cost per Trip
Trip #1								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #2								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #3								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #4								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #5								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #6								\$ -		\$ -		\$ -		\$ -	\$ -
Total In-State Travel	0					\$ -	0	\$ -		\$ -		\$ -		\$ -	\$ -

Figure B2. Out-of-State Travel Budget Table

Out-of-State Travel															
Agency Name: _____															
Fiscal Year: _____															
Trip	# Staff	Staff Positions Travelling	Trip Purpose	Travel Location	# Days	Mileage (Cost per Mile)	Miles Roundtrip	Total Mileage Cost	Lodging Cost per Day	Total Lodging Cost	Per Diem Cost per Day	Total Per Diem Cost	Registration Fee (if applicable)	Total Registration Cost	Total Cost per Trip
Trip #1								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #2								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #3								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #4								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #5								\$ -		\$ -		\$ -		\$ -	\$ -
Trip #6								\$ -		\$ -		\$ -		\$ -	\$ -
Total Out-of-State Travel	0					\$ -	0	\$ -		\$ -		\$ -		\$ -	\$ -

Budget Detail Template

Figure B3. Non-Capital Equipment Budget Table

Non-Capital Equipment				
Item	Explanation (if needed)	Price per Item	Quantity	Total
				\$ -
				-
				-
				-
				-
				-
				-
				-
Total			0.00	\$ -

Figure B4. Office Supplies Budget Table

Office Supplies				
Item	Explanation (if needed)	Price per Item	Quantity	Total
				\$ -
				-
				-
				-
				-
				-
				-
				-
Total			0.00	\$ -

Budget Detail Template

Figure B5. Salary and Fringe Budget Table

Total Salary and Fringe for Each Position					
Title	Name (if requested by Regional Coordinator)	FTE	Salary	Fringe	Total
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
Total		0.00	\$ -	\$ -	\$ -

Figure B6. Nutrition Education Materials Budget Table

Nutrition Education Materials						
Item	Audience	Use	Message	Cost per Item	Number of Items	Total Cost
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
Total					0.00	\$ -

Appendix C. SNAP-Ed Connection and SNAP-Ed Toolkit Websites

SNAP-Ed Connection

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

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

SNAP-Ed Success Stories

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

SNAP-Ed Library

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

- Curricula
- Evaluation tools
- State impact reports

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

SNAP-Ed Connection e-Bulletin

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

Photo Gallery

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

Appendix C: SNAP-Ed Connection and SNAP-Ed Toolkit Websites

SNAP-Ed Program Administration Resources

SNAP-Ed Plan Guidance and Plan Templates can be found at

<https://snaped.fns.usda.gov/program-administration/snap-ed-plan-guidance-and-templates>

State SNAP-Ed Information

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

SNAP-Ed Toolkit

SNAP-Ed Interventions

The Interventions component of the SNAP-Ed Toolkit helps State and implementing agencies identify and select evidence-based obesity prevention and policy, systems, and environmental change (PSE) interventions to include in SNAP-Ed Plans. These interventions help agencies comply with the requirement that State SNAP-Ed Plans must include multi-level interventions or public health approaches that reach low-income households most impacted by health disparities.

<https://snapedtoolkit.org/interventions/find/>

SNAP-Ed Evaluation Framework

The SNAP-Ed Evaluation Framework gives SNAP-Ed professionals the powerful ability to collectively share successes. The Evaluation Framework is SNAP-Ed's opportunity to produce cumulative results using standardized, evidence-informed methods to share with our clients, partner organizations, stakeholders, and policy makers.

<https://snapedtoolkit.org/framework/index/>

Trainings

The Trainings component of the SNAP-Ed Toolkit includes access to online webinars, courses, and other training material (e.g., how-to guides) for State and implementing Agencies. The various trainings provide guidance on program development, delivery, and evaluation as well as on equity and professional development. Continuing education credits are available for some trainings. Identification of training material for inclusion in the Toolkit is reviewed by the SNAP-Ed Toolkit team.

<https://snapedtoolkit.org/training/about-the-trainings/>

Appendix D. Guidelines for Nutrition Education Materials

State agencies should design SNAP-Ed materials to address the cultural, literacy, language, and income needs of the SNAP-Ed target audience.

State agencies should submit media messages and materials prior to their release to FNS Regional Office staff for review, particularly when States are planning large media campaigns and productions.

FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use, or authorize others to use photographs, videos, recordings, computer programs and related source codes, literature, or other products produced, in whole or in part, with SNAP funds for Government purposes. Please review *OTHER FEDERAL POLICIES RELEVANT TO ADMINISTRATION OF SNAP-ED: FEDERAL ROYALTY RIGHTS* for additional information and CFR citation.

Materials with subject matter that is beyond the scope of SNAP-Ed, including the screening for diseases and the treatment and management of diseases, are not allowable costs.

FNS encourages State agencies to submit their materials to the SNAP-Ed Connection for consideration and inclusion in the SNAP-Ed Library at https://snaped.fns.usda.gov/node/add/library_material

Guidelines for Duplicating or Editing SNAP-Ed Materials

If the materials will be reproduced as is, nothing needs to be done.

When any changes or additions are made to the content or design of SNAP-Ed materials, the SNAP and USDA logos must be removed and the following statement must be added:

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

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

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

Guidelines for Use of the USDA and SNAP Logos

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

Appendix D: Guidelines for Nutrition Education Materials

Use of the SNAP logo must follow requirements as stated in the *SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) USING THE SNAP LOGO* guide. The guide is located at <https://www.fns.usda.gov/snap/logo-guidance>.

Nondiscrimination Statement Use

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

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

The nondiscrimination statement should be made available in English or other languages appropriate for the local population served or directly affected by any USDA program or activity. Please be sure to use the provided USDA translations, rather than have the statement translated for you. Translated versions of the nondiscrimination statement will be available in the following languages:

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

Appendix D: Guidelines for Nutrition Education Materials

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

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

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

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

- is not funded by the USDA/SNAP-Ed;
- only contains content that provides general information for the public (examples are menus, calendars, and recipes); and
- has no SNAP or SNAP-Ed program information or reference to SNAP application or eligibility.

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

Appendix D: Guidelines for Nutrition Education Materials

Example Documents

Example 1: Since the handout below includes program information, such as goals and objectives, it would require the short nondiscrimination statement, “This institution is an equal opportunity provider.”

What does SNAP-Ed provide?

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

Participants receive...

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

Participants learn how to...

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

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

What participants had to say...

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

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

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

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

Example 2: The Farmer's Market Stir-Fry recipe does not provide SNAP-Ed program information or use a USDA or MyPlate logo, so nondiscrimination statement is *not* required.

Farmer's Market Stir-Fry ^[1]

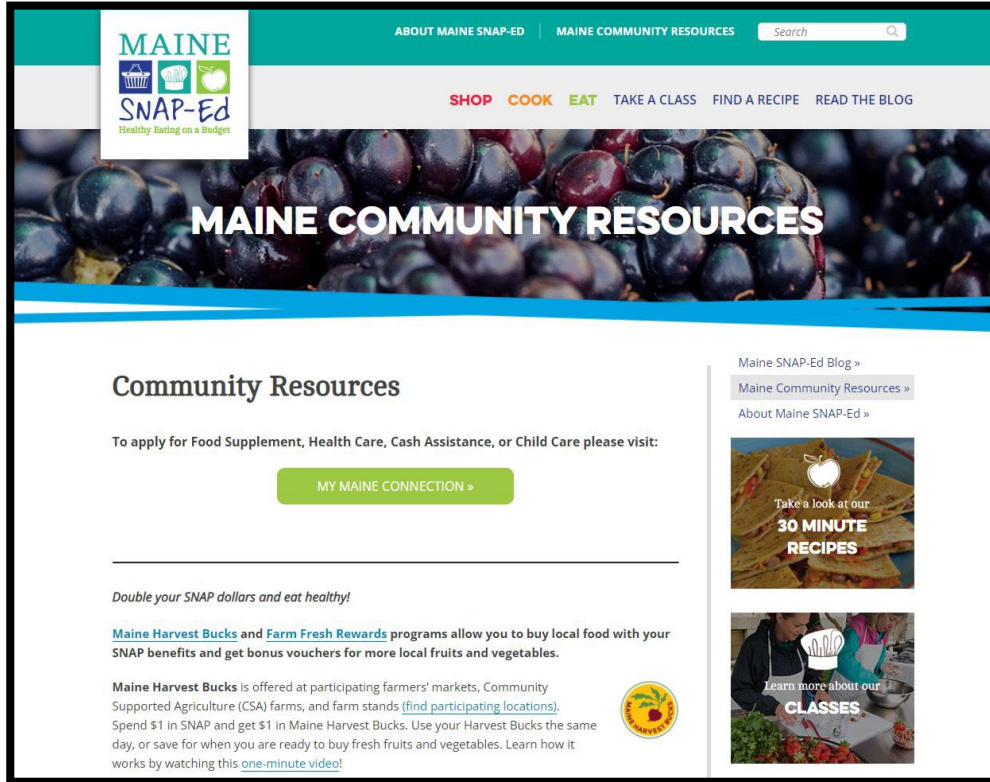
Serves: 8

Ingredients:

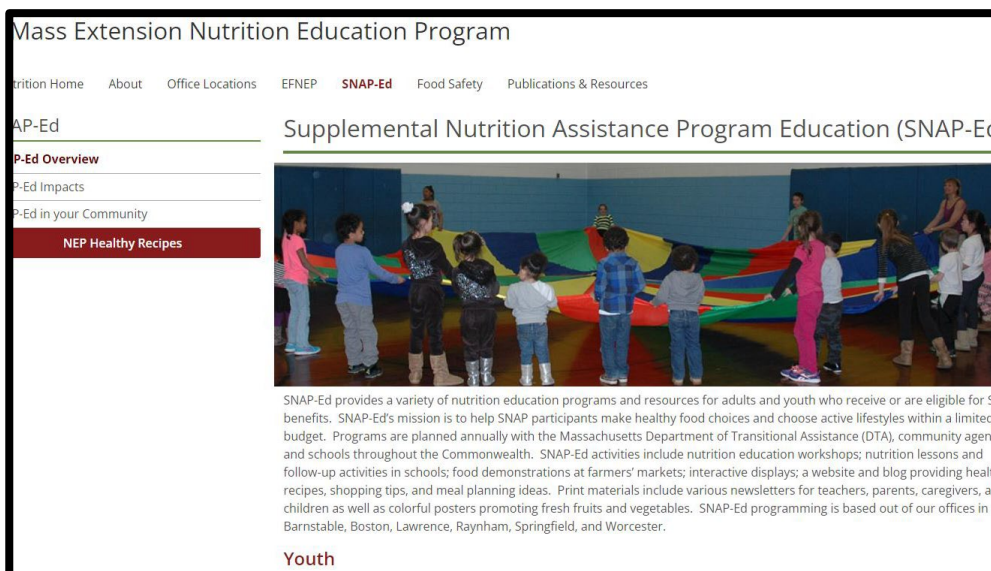
- 2 cups cooked brown rice
- vegetable oil cooking spray
- 3 gloves garlic or $\frac{1}{2}$ teaspoon garlic powder
- 1 teaspoon fresh ginger or $\frac{1}{2}$ teaspoon ground ginger
- 1 cup onion, diced
- 1 cup broccoli, cut into bite-sized pieces
- 1 cup carrots, sliced
- 1 cup cabbage, chopped
- 1 cup cauliflower, cut into bite-sized pieces

Appendix D: Guidelines for Nutrition Education Materials

Example 3: The web page pictured below includes a link to application forms for SNAP benefits; therefore, it requires the full nondiscrimination statement from the USDA website at <https://www.fns.usda.gov/usda-nondiscrimination-statement>. The link to the appropriate statement can be placed in the footer.



Example 4: The website pictured below does not link to or feature SNAP benefit information or applications, so the short nondiscrimination statement suffices.



Appendix D: Guidelines for Nutrition Education Materials

Example 5: This participant recruitment flyer would require the short nondiscrimination statement since it includes SNAP-Ed program information, such as locations and contact details. Although the program is not explicitly referred to as a “SNAP-Ed” activity, the short nondiscrimination statement is required because the program provides nutrition education using SNAP-Ed funding

Eat Well, Live Well

FREE nutrition & lifestyle classes with Food \$ense

What: FREE cooking and nutrition classes! At each class you will enjoy FREE FOOD SAMPLES and learn new, tasty recipes that won't break your budget!

Where: Cache County Administration Building multi-purpose room. (179 North Main St, Logan)

Who: Everyone! Out of respect for the hearing impaired, room space and others attending, no children and/or babies permitted.

Sign Up: Call 435-752-6263 or email cachecountyfoodsense@gmail.com to reserve your spot. *Please register 24 hours in advance.*



Appendix D: Guidelines for Nutrition Education Materials

Full Nondiscrimination Statement

English:

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

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

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

1. mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410
2. fax: (202) 690-7442 or
3. email: program.intake@usda.gov

This institution is an equal opportunity provider.

Spanish

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

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

Appendix D: Guidelines for Nutrition Education Materials

Las personas con discapacidades que necesiten medios alternativos para la comunicación de la información del programa (por ejemplo, sistema Braille, letras grandes, cintas de audio, lenguaje de señas americano, etc.), deben ponerse en contacto con la agencia (estatal o local) en la que solicitaron los beneficios. Las personas sordas, con dificultades de audición o con discapacidades del habla pueden comunicarse con el USDA por medio del Federal Relay Service [Servicio Federal de Retransmisión] llamando al (800) 877-8339. Además, la información del programa se puede proporcionar en otros idiomas.

Para presentar una denuncia de discriminación, complete el Formulario de Denuncia de Discriminación del Programa del USDA, (AD-3027) que está disponible en línea en: <https://www.usda.gov/sites/default/files/documents/USDAProgramComplaintForm-Spanish-Section508Compliant.pdf>, y en cualquier oficina del USDA, o bien escriba una carta dirigida al USDA e incluya en la carta toda la información solicitada en el formulario. Para solicitar una copia del formulario de denuncia, llame al (866) 632-9992. Haga llegar su formulario lleno o carta al USDA por:

1. correo: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
2. fax: (202) 690-7442; o
3. correo electrónico: program.intake@usda.gov.

Esta institución es un proveedor que ofrece igualdad de oportunidades.

Edits and size requirements

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

Credit

Credit should be provided to SNAP as a funding source on newly developed and reprinted materials. FNS recommends the following statements:

English: “This material was funded by USDA's Supplemental Nutrition Assistance Program - SNAP.”

Spanish: “Este material se desarrolló con fondos proporcionados por el Supplemental Nutrition Assistance Program (SNAP en inglés) del Departamento de Agricultura de los EE.UU. (USDA siglas en inglés).”

About Team Nutrition Materials

Team Nutrition is an initiative of the US. Department of Agriculture's Food and Nutrition Service that supports the Child Nutrition Programs through training and technical assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity. The goal of Team Nutrition is to improve children's lifelong eating and physical activity habits through nutrition education based on the principles of the Dietary Guidelines for Americans and MyPlate. SNAP-Ed and Team Nutrition materials may be used to deliver direct nutrition education and physical activity through Approach One.

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

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

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

Articles about the Team Nutrition approach include:

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

The development process for Team Nutrition materials includes the following:

- Review of peer-reviewed nutrition education literature
- Application of Social Cognitive Theory and development of behaviorally focused objectives
- Formative research with the target audience to test concepts, nutrition education messages, and images

Appendix D: Guidelines for Nutrition Education Materials

- Alignment with educational standards, such as math, science, English, and health
- Formative research of draft materials with the target audience (e.g., piloting of materials in classrooms, focus group testing of parent materials, teacher interviews, etc.)
- Review by Child Nutrition experts and stakeholders
- Review by U.S. Department of Agriculture and the Department of Health and Human Services via a Dietary Guidelines Work Group for consistency with the Dietary Guidelines for American and technical accuracy

Examples of Team Nutrition materials (<https://www.fns.usda.gov/tn>) include:

- Grow It, Try It, Like It! (Pre-K)
- Discover MyPlate: Nutrition Education for Kindergarten
- Serving Up MyPlate: A Yummy Curriculum (Grades 1-6)
- The Great Garden Detective Adventure (Grades 3-4)
- Dig In! Nutrition Education from the Ground Up (Grades 5-6)
- Fueling My Healthy Life (Grades 6-8)

Start Simple with MyPlate

CNPP's *Start Simple with MyPlate* campaign was developed to promote healthy eating and physical activity. No matter your age, healthy eating is important. Small changes matter, so let's help Americans make every bite count. Start Simple with MyPlate today!



- *START SIMPLE WITH MYPLATE* (www.MyPlate.gov) provides tips and recipe ideas from the five MyPlate food groups (Fruits, Vegetables, Grains, Protein Foods, Dairy) that Americans can easily incorporate into their busy lives no matter their food preferences, cultural traditions, health status, or budget.
- The goal of Start Simple is to help consumers meet their food group targets and eat healthy.
- Start by taking the MyPlate Quiz to find out what food group recommendations you are meeting and where you might need more help.
- Download the Start Simple with MyPlate App to set daily, achievable goals to help you eat healthy throughout the day and week.

Food and Drug Administration (FDA) Nutrition Label Educational Materials

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

Appendix E: Definitions of Terms

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

Administrative Costs refers to the financial costs characterized by the following types of activities:

- Dollar value of salaries and benefits associated with staff time dedicated towards the administration of SNAP-Ed
- Cost of training for performing administrative functions like record keeping and accounting, etc.
- Cost of reporting SNAP-Ed activities
- Operating costs
- Indirect costs for those administrative staff not covered above
- Other overhead charges associated with administrative expenses (i.e. space, human resource services, etc.)

Allowable Cost refers to costs that are reimbursable from Federal program funds because they support SNAP-Ed and conform to Government-wide and SNAP-specific cost policy.

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

New: Approaches are types of intervention strategies. There are three SNAP-Ed approaches. Plans must include approach 1. Plans also must include approach 2 or 3; both may be included.

1. Individual or group-based direct nutrition education, health promotion, and intervention strategies
2. Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels
3. Community and public health approaches to improve nutrition and obesity prevention **End of new material**

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 nutrition or physical activity issues, for example encouraging breast feeding practices; (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

Appendix E: Definitions of Terms

discounts, and purchasing in bulk; and (e) food security such as applying for nutrition assistance programs (i.e. WIC, SNAP, Child Nutrition Programs, Food Distribution Programs, etc.).

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

Capital Equipment is non-expendable property having a value of \$5000 or more per item at the time of acquisition. Capital equipment shall (7CFR 277 (OMB Circular A-87)) be inventoried and accounted for every 2 years by a physical inventory process. Capital equipment shall be disposed of in accordance with Federal property management requirements.

Census Tracts are small, relatively permanent geographic entities within counties (or the statistical equivalent of counties) delineated by a committee of local data users. Generally, census tracts have between 2,500 and 8,000 residents and boundaries that follow visible features. Census tract data may be used in targeting audiences for delivery of SNAP-Ed.

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

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

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

Collective Impact is the commitment by a group of actors from different sectors to a common agenda to solve complex social problems such as healthy eating or obesity prevention. Collective impact requires five conditions for success: a common agenda, shared measurement, mutually reinforcing activities based on a common action plan,

Appendix E: Definitions of Terms

continuous communication, and backbone support to guide the group's actions, provide technical support, and mobilize resources.

Commodity Supplemental Food Program (CSFP) is the program that works to improve the health of low-income persons at least 60 years of ages by supplementing their diets with nutritious USDA foods.

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

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

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

New: Direct education is an evidence-based, behavior-focused nutrition education and physical activity intervention conducted at the individual and interpersonal levels with an intensity and duration that supports behavior change and allows for active engagement in-person or through interactive media. **End of new material**

Education and Administrative Reporting System (EARS): an annual data and information collection process completed by SNAP State agencies. It collects uniform data and information on nutrition education activities funded by SNAP during the prior fiscal year. **New:** This reporting system for SNAP-Ed will be phased out after FY 2022 reporting. **End of new material.**

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

EFNEP is the **Expanded Food and Nutrition Education Program** of the National Institute of Food and Agriculture, U.S. Department of Agriculture. EFNEP is conducted by Cooperative Extension, through a Federal, State, and local (community-based) partnership. It serves youth and families with limited financial resources in all States and U.S. Territories. 1862 and 1890 Land-Grant Universities provide State-level leadership for local programming. EFNEP employs paraprofessionals to deliver evidence-based, hands-on, interactive lessons to participants. State and local EFNEP leadership also contribute to policy, systems, and environmental change efforts through their Extension and University connections. EFNEP staff work collaboratively with SNAP-Ed staff to increase reach and facilitate improved nutritional well-being among low-income populations nationwide. For more information on EFNEP and supporting resources, see <https://nifa.usda.gov/program/about-efnep>.

Emerging Strategies or Interventions are community- or practitioner-driven activities that have the potential for obesity prevention, but have not yet been formally evaluated

Appendix E: Definitions of Terms

for obesity prevention outcomes. Emerging strategies or interventions in SNAP-Ed require a justification for a novel approach and must be evaluated for effectiveness.

Evidence-Based Approach for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available practice-based evidence. The best research evidence refers to relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence. Practice-based evidence refers to case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential.

Evidence may be related to obesity prevention target areas, intervention strategies, and/or specific interventions. The target areas are identified in the *2020-2025 DIETARY GUIDELINES FOR AMERICANS* (see <https://www.dietaryguidelines.gov/resources/2020-2025-dietary-guidelines-online-materials>). SNAP-Ed services may also include emerging strategies or interventions, which are community- or practitioner-driven activities that have the potential for obesity prevention, but have not yet been formally evaluated for obesity prevention outcomes. Emerging strategies or interventions require a justification for a novel approach and must be evaluated for effectiveness. Intervention strategies are broad approaches to intervening on specific target areas. Interventions are a specific set of evidence-based, behaviorally-focused activities and/or actions to promote healthy eating and active lifestyles. Evidence-based allowable use of funds for SNAP-Ed include conducting and evaluating intervention programs, and implementing and measuring the effects of policy, systems, and environmental changes in accordance with SNAP-Ed Guidance.

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

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

Food Bank means a public or charitable institution that maintains an established operation involving the provision of food or edible commodities, or the products of food or edible commodities, to food pantries, soup kitchens, hunger relief centers, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to feed needy persons on a regular basis.

Food Distribution Program on Indian Reservations (FDPIR) provides USDA foods to income-eligible households living on Indian reservations, and to Native American households residing in approved areas near reservations or in Oklahoma.

Food Pantry/Food Shelf: a public or private nonprofit organization that distributes food to low-income and unemployed households, including food from sources other than the Department of Agriculture, to relieve situations of emergency and distress.

Full-Time Equivalent (FTE) employment, as defined by the Federal government, means the total number of straight-time hours (i.e., not including overtime pay or holiday

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hours) worked by employees divided by the number of compensable hours (2,080 hours) in the fiscal year. According to this definition, annual leave, sick leave, compensatory time off, and other approved leave categories are considered “hours worked” for purposes of defining FTE employment. States may define FTEs differently than the Federal standard. States may use their own definition of FTEs in their SNAP-Ed Plan, but shall clearly state the definition and the basis for the calculation.

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

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

Grantee means the agency of the State responsible for administering SNAP. Federal funds are paid to this agency for all food costs, and for 100 percent of all non-food expenditures, including program administration and nutrition education. The grantee in turn takes agreements with local agencies (sub grantees) to conduct SNAP-Ed activities. Federal funds are made available to pay for 100 percent of all allowable nutrition education costs on a payment basis.

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

Indirect Cost Rate is a rate typically computed by summing all indirect costs then dividing the total by the Modified Total Direct Costs. The resulting percentage is applied to each grant to determine its share of the indirect or overhead costs. Indirect cost rates applied in the SNAP-Ed plan shall be documented through an indirect cost plan that is approved by a cognizant agency. If the rate is not approved, the computation of the rate shall be acceptable to FNS.

New: Indirect Education Channel or Indirect Channel is the distribution or display of information and resources, including any mass communications, public events (such as health fairs), and materials distribution, which involve no participant interaction with an instructor or multimedia. **End of new material**

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

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

Low-Income Persons are people participating in or applying for SNAP, as well as people with low financial resources defined as gross household incomes at or below 185 percent of poverty. National School Lunch Program data on the number of children eligible for free and reduced-price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where low-income persons reside, are examples of available data sources that can be used to

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identify low-income populations. Participation in other means-tested Federal assistance programs may also be used as a proxy for low-income since these individuals have gross family incomes below 185 percent of poverty.

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

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

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

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

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.
- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; parenteral nutrition delivered via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients.

Medical nutrition therapy services are outside the scope of SNAP-Ed, and their cost is unallowable. Allowable SNAP-Ed activities focus on primary prevention of disease. Accordingly, they include activities to help the SNAP-Ed population to prevent or to postpone the onset of chronic disease by establishing more physically active lifestyles and healthier eating habits. By contrast, medical nutrition therapy is a secondary intervention that focuses on helping people already afflicted with the disease and its effects and to prevent additional disability. Medical nutrition therapy services are not allowable SNAP-Ed costs.

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

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

Non-capital Equipment is property having a value of less than \$5,000 per item at the time of acquisition. This equipment is generally treated as supplies and is not required to be included in any property management system. Treatment and disposition of non-expendable equipment should be done in accordance with State or local property management requirements.

Non-Federal Public Agency is a State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such as organizations that are chartered by State or local governments for public purpose.

New: Nonproject activities are all efforts funded by SNAP-Ed other than projects that are designed to accomplish State priority goals and objectives. Examples include comprehensive needs assessments, general staff training (e.g., civil rights training), technical assistance, and peer-to-peer learning that benefit staff across multiple projects. Other examples include convening of coalitions, contracted services such as evaluation and formative research, and other activities not tied to a specific project. Note that administrative activities, such as procurement, are neither projects nor nonproject activities. **End of new material**

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

New: Nutrition Security is defined as the consistent access, availability, and affordability of foods and beverages that promote well-being and prevent (and if needed, treat) disease, particularly among racial/ethnic minority populations, populations living under the Federal poverty line, and rural and remote populations. **End of new material.**

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

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

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

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New: Outreach: “SNAP Outreach” is a the SNAP functional area which provides information or assistance to individuals who might be eligible for SNAP (<https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap>) in order to help them make an informed decision whether to apply for the Program. State SNAP agencies seeking Federal funding for outreach activities may annually submit an Outreach plan to FNS for approval. “SNAP Outreach” is not an allowable SNAP-Ed expense. SNAP-Ed may conduct outreach activities to inform potential participants or community partners of SNAP-Ed nutrition education, PSE, and social marketing interventions. “SNAP-Ed outreach” is not the same as “SNAP Outreach.” **End of new material.**

Period of Performance means the total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. (2 CFR 200.77).

Plan Confirmation means a time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of plan confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of plan confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS (normally this will not be an issue since audits normally occur at least every 2 years). For further information refer to 2 CFR 220 (OMB Circular A-21). If approval through the audit process has not occurred, the Division of Cost Allocation, DHHS, should be contacted as follows:

The U.S. Department of Health and Human Services
Office of the Secretary
Division of Cost Allocation
200 Independence Ave, S.W.
Washington, D.C. 20201
Telephone: 202-401-2808
Toll Free: 1-877-696-6775

New: Policy, systems, and environmental (PSE) change initiatives for SNAP-Ed are interventions that have the potential to improve a community's health by making healthy food and physical activity choices more accessible, easier, and the default option. For more information, see <https://psechange.org/>, <https://snapedtoolkit.org/framework/index/environmental-settings/>, and <https://snaped.fns.usda.gov/snap-ed-works/policy-systems-and-environmental-change>.

End of new material

Poverty Guidelines are an administrative version of the Federal poverty measure and are issued annually by the Department of Health and Human Services in the Federal Register. Sometimes referred to as the Federal Poverty Level, these guidelines are often used to set eligibility for certain programs. <https://aspe.hhs.gov/poverty-research>.

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Poverty Thresholds are the statistical version of the Federal poverty measure and are released annually by the Census Bureau. They are used to estimate the number of persons in poverty in the United States or in States and regions.

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

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

New: Project is defined as an intervention or a cluster of interventions or activities executed by a single agency (State agency, implementing agency, or subcontractor) with common goals, intended outcomes, target audiences (e.g., youth), and implementation setting types (e.g., school). Project activities include planning and reporting. **End of new material**

New: Project monitoring is required for all SNAP-Ed projects. It includes the collection and analysis of data on how the project was implemented (e.g., attendance at nutrition education sessions) and the outcomes the project was anticipated to affect (e.g., fruit and vegetable consumption). Project monitoring data are used to complete the SNAP-Ed Annual Report. **End of new materials**

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

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

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

https://www.hud.gov/topics/rental_assistance/phprog

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

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

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

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

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

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

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

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

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

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

SNAP-Ed Plan is an official written document that describes SNAP-Ed services States may provide. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

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

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

SNAP Nutrition Education and Obesity Prevention Services are a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, demonstrated to facilitate adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants, and low-income individuals eligible to receive benefits under SNAP or other means-tested Federal assistance programs, and individuals residing in communities with a significant low-income population. Nutrition education and obesity prevention services are delivered through multiple venues, often through partnerships, and involve activities at the individual, interpersonal, community, and societal levels. Acceptable policy level interventions are activities that encourage healthier choices based on the current *DIETARY GUIDELINES FOR AMERICANS* (DGA). Intervention strategies may focus on increasing consumption of certain foods, beverages, or nutrients as well as limiting consumption of certain foods, beverages, or nutrients consistent with the DGA.

Social-Ecological Framework for Nutrition and Physical Activity Decisions

illustrates how all elements of society, including individual factors (demographic factors, psychosocial, knowledge, and skills, etc.), environmental settings (schools, workplaces, faith-based organizations, food retail establishments, etc.), sectors of influence (government, industry, media, public health and health care systems, etc.), and social and cultural norms and values (belief systems, religion, heritage, body image, etc.) combine to shape an individual's food and physical activity choices, and ultimately one's calorie balance and chronic disease risk.

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

New: Social Marketing Campaign is defined as a coordinated set of communications delivered to one or more SNAP-Ed market segments to a particular population across a large geographic area. It is typically branded, communicates a common call to action, is delivered in multiple complementary settings and channels, and focuses on one or more priority behavior changes. Please visit the social marketing page on SNAP-Ed Connection (<https://snaped.fns.usda.gov/snap-ed-works/social-marketing>) for additional information and examples of SNAP-Ed social marketing. **End of new material**

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Soup Kitchen: a public or charitable institution that, as an integral part of the normal activities of the institution, maintains an established feeding operation to provide food to needy homeless persons on a regular basis.

State Agency means the agency of State government, including the local offices thereof, which is responsible for the administration of the Federally aided public assistance programs within the State, and in those States where such assistance programs are operated on a decentralized basis; it includes the counterpart local agencies, which administer such assistance programs for the State agency.

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

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

Sub-grantee means the organization or person to which a State agency, as grantee, takes an agreement to conduct nutrition education and obesity prevention activities. Federal funds pay the grantee for 100 percent its allowable administrative costs. The grantee in turn generally will pay sub grantees for 100 percent of their allowable costs. The subgrantee is accountable to the grantee for the use of funds provided, and the grantee is accountable to the Food and Nutrition Service for the use of all Federal funds provided.

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

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

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

Team Nutrition is an initiative of the Food and Nutrition Service to support the Child Nutrition Programs through training and technical assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity. Team Nutrition makes resources available to schools and childcare at <https://www.fns.usda.gov/tn>.

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

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

Appendix F. Acronyms

APD - Advance Planning Document

CFR - Code of Federal Regulations

CACFP - Child and Adult Care Food Program

CFR - Code of Federal Regulations

CDC - Centers for Disease Control and Prevention

CNP - Child Nutrition Programs

CNPP - Center for Nutrition Policy and Promotion

DGA - Dietary Guidelines for America

DNPAO - Division of Nutrition, Physical Activity, and Obesity

EARS - Education and Administrative Reporting System

EFNEP - Expanded Food and Nutrition Education Program

FDPIR - Food Distribution Program on Indian Reservations

FFY - Federal Fiscal Year

FM - Financial Management

FNS - Food and Nutrition Service

FNSRO - Food and Nutrition Service Regional Office

FPRS - Food Program Reporting System

FY - Fiscal Year

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

IA - Implementing Agency

ITO - Indian Tribal Organization

ME - Management Evaluation

MOU - Memorandum of Understanding

NAL - National Agricultural Library

NCCOR - National Collaborative on Childhood Obesity Research

NEOP – Nutrition education and obesity prevention

Appendix F: Acronyms

NIFA - National Institute of Food and Agriculture

OMB - Office of Management and Budget

PAG - Physical Activity Guidelines

PDF - Portable Document Format

PHA - Public health approaches

PSA - Public Service Announcement

PSE - Policy, systems, and environment

SA - State Agency

SEM - Social-Ecological Model

SNAP - Supplemental Nutrition Assistance Program

SNAP-Ed - Supplemental Nutrition Assistance Program Education

TA - Technical Assistance

TANF - Temporary Assistance for Needy Families

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

USDA - Department of Agriculture

Appendix G. SNAP-Ed Management Evaluation Guide

SNAP-ED Management Evaluation Guide for State Agencies

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

Citations	Questions for Determining Compliance	Yes	No
Per SNAP-Ed Guidance	Has the State agency (SA) identified clear population health-related nutrition and physical activity goals for its SNAP-Ed target population such as percent reductions in childhood obesity rates, and in prevalence of diet-related diseases such as diabetes?		
§272.1(c)(1)	<p>Has disclosure of information obtained from SNAP applicant households been restricted to persons directly connected with the administration or enforcement of the Food Stamp Act or regulations?</p> <ul style="list-style-type: none"> • Do any data sharing agreements specify the data to be exchanged, the procedures used to exchange the data, how the data will be stored and who will have access, steps to be taken in case of a data breach, and how data will be securely destroyed? • Is participant information protected through the use of encrypted servers? 		
§272.2(d)(2)(ii)	Does the SA notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities?		
§272.2(d)(2)(iii)	Does the SA describe methods used to identify its target audience that follow approved targeting strategies and supporting data sources included in the SNAP-Ed Plan Guidance and alternate targeting strategies approved by FNS?		

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Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(iv)	<p>Does the SA have a valid, data-driven needs assessment on the nutrition, physical activity, and obesity prevention needs of the target population and the barriers to accessing healthy foods and physical activity?</p> <p>Does the needs assessment consider the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, and transportation/mobility needs?</p>		
§272.2(d)(2)(v)	<p>Does the SA ensure that interventions are appropriate for low-income individuals eligible to receive SNAP benefits? Do interventions recognize the population's constrained resources and potential eligibility for Federal food assistance?</p>		
§272.2(d)(2)(vi)	<p>Does the SA provide evidence-based nutrition education and obesity prevention services either directly or through agreements with IAs and community organizations?</p>		
§272.2(d)(2)(vii)(A)	<p>Does the SA use the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan?</p> <p>Does the SA provide oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts?</p> <ul style="list-style-type: none"> • Are costs allowable, necessary, and reasonable? • Are costs in accordance with 2 CFR 200 Subpart E "Cost Principles" 		
§272.2(d)(2)(vii)(B)	<p>Does the SA's SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports?</p>		

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Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(vii)(B)	Are the activities designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors?		
§272.2(d)(2)(vii)(B)	Are the nutrition education and obesity prevention services delivered through multiple venues?		
§272.2(d)(2)(vii)(B)	Are activities delivered at the individual, community, and appropriate policy levels? Note, acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans		
§272.2(d)(2)(vii)(B)	Are all strategies and interventions evidence-based?		
§272.2(d)(2)(vii)(B)	Are there research-based strategies and interventions that reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence?		
§272.2(d)(2)(vii)(B)	Are there practice-based strategies and interventions that reflect case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential? Is the State providing sufficient justification for the use of emerging strategies and evaluating all emerging strategies for effectiveness?		
§272.2(d)(2)(vii)(C)	Do the SA's SNAP-Ed activities promote healthy food and physical activity choices based on the most recent Dietary Guidelines for Americans and Physical Activity Guidelines?		

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Citations	Questions for Determining Compliance	Yes	No
Per SNAP-Ed Guidance	Has the State agency (SA) identified clear population health-related nutrition and physical activity goals for its SNAP-Ed target population such as percent reductions in childhood obesity rates, and in prevalence of diet-related diseases such as diabetes?		
§272.1(c)(1)	<p>Has disclosure of information obtained from SNAP applicant households been restricted to persons directly connected with the administration or enforcement of the Food Stamp Act or regulations?</p> <ul style="list-style-type: none"> • Do any data sharing agreements specify the data to be exchanged, the procedures used to exchange the data, how the data will be stored and who will have access, steps to be taken in case of a data breach, and how data will be securely destroyed? • Is participant information protected through the use of encrypted servers? 		
§272.2(d)(2)(ii)	Does the SA notify applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities?		
§272.2(d)(2)(iii)	Does the SA describe methods used to identify its target audience that follow approved targeting strategies and supporting data sources included in the SNAP-Ed Plan Guidance and alternate targeting strategies approved by FNS?		

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Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(iv)	<p>Does the SA have a valid, data-driven needs assessment on the nutrition, physical activity, and obesity prevention needs of the target population and the barriers to accessing healthy foods and physical activity?</p> <p>Does the needs assessment consider the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, and transportation/mobility needs?</p>		
§272.2(d)(2)(v)	<p>Does the SA ensure that interventions are appropriate for low-income individuals eligible to receive SNAP benefits? Do interventions recognize the population's constrained resources and potential eligibility for Federal food assistance?</p>		
§272.2(d)(2)(vi)	<p>Does the SA provide evidence-based nutrition education and obesity prevention services either directly or through agreements with IAs and community organizations?</p>		
§272.2(d)(2)(vii)(A)	<p>Does the SA use the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan?</p> <p>Does the SA provide oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts?</p> <ul style="list-style-type: none"> • Are costs allowable, necessary, and reasonable? • Are costs in accordance with 2 CFR 200 Subpart E "Cost Principles" 		
§272.2(d)(2)(vii)(B)	<p>Does the SA's SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports?</p>		

Appendix G: SNAP-Ed Management Evaluation Guide

Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(vii)(B)	Are the activities designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors?		
§272.2(d)(2)(vii)(B)	Are the nutrition education and obesity prevention services delivered through multiple venues?		
§272.2(d)(2)(vii)(B)	Are activities delivered at the individual, community, and appropriate policy levels? Note, acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans		
§272.2(d)(2)(vii)(B)	Are all strategies and interventions evidence-based?		
§272.2(d)(2)(vii)(B)	Are there research-based strategies and interventions that reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence?		
§272.2(d)(2)(vii)(B)	Are there practice-based strategies and interventions that reflect case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential? Is the State providing sufficient justification for the use of emerging strategies and evaluating all emerging strategies for effectiveness?		
§272.2(d)(2)(vii)(C)	Do the SA's SNAP-Ed activities promote healthy food and physical activity choices based on the most recent Dietary Guidelines for Americans and Physical Activity Guidelines?		

Appendix G: SNAP-Ed Management Evaluation Guide

Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	<p>Does the SA provide annual civil rights training for all SNAP-Ed agencies?</p> <ul style="list-style-type: none"> • Civil Rights training is current and accurate? • Civil Rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance? 		
FNS Instruction 113-1	<p>Is annual civil rights training provided for all front-line personnel?</p> <ul style="list-style-type: none"> • Civil Rights training is current and accurate? • Civil Rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance? <p>Civil Rights training includes the nine mandatory topics (Collection and use of data; effective public notification systems; complain procedures; compliance review techniques; resolution of non-compliance; requirements for reasonable accommodation for persons with disabilities; requirements for language assistance; conflict resolution; and customer service)?</p>		
FNS Instruction 113-1	<p>Does the SA monitor IA civil rights compliance as part of SNAP-Ed reviews?</p> <ul style="list-style-type: none"> • Civil Rights review questions or prompts are included on SA standard review forms? 		

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Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	<ul style="list-style-type: none"> • Nutrition education and related services/benefits are provided free from discrimination? • Materials developed and used are appropriate for audience • The education provided and materials used are culturally appropriate • In-person education is provided at accessible locations (convenient to public transportation, free parking, etc.) and on days/times that are convenient for audience participation • Bilingual staff are provided as needed; minimally, the presenter/educator has a way to communicate with all participants 		

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

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SNAP-ED Management Evaluation Guide for Implementing Agencies

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

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

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

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Citations	Questions for Determining Compliance	Yes	No
§272.2(d)(2)(xi)	<p>Does the IA meet FNS fiscal recordkeeping and reporting requirements, including:</p> <ul style="list-style-type: none"> All SNAP-Ed expenditures are reported on the Financial Status Report SF-425 <p>SA collects and reports State and private contributions to the SNAP-Ed activities through the EARS via FNS-759</p>		
§272.2(d)(2)(xii)	<p>Does the IA seek additional information regarding the type of nutrition education and obesity prevention activities offered and the characteristics of the target population served to determine whether nutrition education goals are being met?</p> <p>Does the IA periodically evaluate whether or not its meeting nutrition education goals?</p>		

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Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	<p>IA provides annual civil rights training for all front-line personnel?</p> <ul style="list-style-type: none"> • Civil Rights training is current and accurate? • Civil Rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance? <p>Civil Rights training includes the nine mandatory topics (Collection and use of data; effective public notification systems; complain procedures; compliance review techniques; resolution of non-compliance; requirements for reasonable accommodation for persons with disabilities; requirements for language assistance; conflict resolution; and customer service)?</p>		
FNS Instruction 113-1	<p>Nutrition education and related services/benefits are provided free from discrimination?</p> <ul style="list-style-type: none"> • Materials developed and used are appropriate for audience • The education provided and materials used are culturally appropriate • In-person education is provided at accessible locations (convenient to public transportation, free parking, etc.) and on days/times that are convenient for audience participation • Bilingual staff are provided as needed; minimally, the presenter/educator has a way to communicate with all participants 		
FNS Instruction 113-1	<p>Materials contain the required USDA non-discrimination statement in accordance with the SNAP-Ed Guidance. If other statements are also used, they are listed separately, and the USDA statement is listed first?</p>		
FNS Instruction 113-1	<p>Nondiscrimination (“And Justice for All”) posters are posted whenever and wherever SNAP-Ed services/education/interventions are provided?</p>		