



US Department of
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Food and Nutrition
Service
Food Stamp Program

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Food Stamp Nutrition Education Plan Guidance

Federal Fiscal Year 2007



2007 Guidance Change Highlights

These highlights briefly summarize some of the key changes in the Fiscal Year (FY) 2007 Food Stamp Nutrition Education Plan Guidance. This summary is not comprehensive and does not list or discuss changes in detail. State agencies should thoroughly review the actual FY 2007 Guidance before submitting their FY 2007 Plan. We have highlighted modified portions of the Guidance in yellow to reflect changes from last year.

1. **Incorporation of the FSNE Guiding Principles.** Several changes were made to the FY 2007 Guidance based upon the release of the FSNE Guiding Principles on September 9, 2005. These changes include:
 - a. The FSNE Guiding Principles are included in Appendix H of this Guidance. These six principles establish standards of excellence for FSNE.
 - b. The FY 2007 Guidance operationalizes concepts under Guiding Principle Number 1 that address public locations where FSNE can be delivered without an Exclusivity Waiver. In Part II of this Guidance under *Section A: Identifying and Understanding the Target Audience*, the category of *Likely Eligibles* (Category 2) has been expanded to include specific locations where FSNE can be delivered without a waiver. This allows State agencies to provide FSNE, without prior exclusivity waiver approval, at FSP/TANF offices, public housing and food banks, food pantries, or soup kitchens. These locations are defined in Appendix D: Definitions. For food pantries and soup kitchen locations, FSNE must be delivered at a time when low-income persons are receiving food at these sites (i.e., when persons are visiting a food pantry to obtain food). As noted in the FY 2006 Guidance, food distribution costs are not reimbursable FSNE expenditures. Examples of audiences that may be served within Category 2 are included in Table 1 on page 9.
 - c. The FY 2007 Guidance continues to direct States to use their needs assessment to target FSNE effectively and efficiently. As stated in Guiding Principle Number 3, women living in households with children and children themselves comprise, on a national level, the majority of persons receiving FSP benefits. Consequently, FNS recommends that States maximize their investment in FSNE by targeting FSNE to first women and then children in FSP eligible households. However, this Guidance does not limit the provision of FSNE to certain age or gender segments of the FSP eligible population.
 - d. The FY 2007 Guidance (page 4) encourages States to address the three behavioral outcomes presented under Guiding Principle Number 4:
 - i. Eat fruits and vegetables, whole grains, and nonfat or low-fat milk

- or milk products every day.
- ii. Be physically active every day as part of a healthy lifestyle.
- iii. Balance calorie intake from foods and beverages with calories expended.

States may continue to address other nutrition-related behavioral outcomes as long as they are consistent with the Dietary Guidelines for Americans and this Guidance. Appropriate content for FSNE is described in the FSNE Guiding Principles and sections of the Guidance that address the goal, scope, focus and key behavioral outcomes of FSNE. References to the “four core elements” have been eliminated from the 2007 Guidance. Dietary quality, with consideration of the importance of food resource management, food security, and food safety, is encompassed in the above-mentioned sections of the Guidance.

- e. The section of the Guidance entitled *Important Notes About Materials* (pages 13-14) has been revised to communicate that curricula and social marketing campaigns must be science-based and behaviorally focused as defined under Guiding Principle Number 4. This section also encourages States to focus messages on the three behavioral outcomes addressed under letter “d” above.
 - f. Nutrition Education is defined in Appendix D of the FY 2007 Guidance, incorporating the definition of FSNE established in Guiding Principle Number 2.
2. **MyPyramid References.** This Guidance has been updated to reference the USDA Food Guidance System, MyPyramid, which was released on April 19, 2005.
 3. **Reporting of Direct and Indirect Contacts.** Due to the ongoing development of the Education and Administrative Reporting System (EARS), the section of the Final Report requesting Contact Summary Data has been eliminated for 2007 Plans. Templates have been renumbered to reflect this deletion.
 4. **State Nutrition Education Report Summary.** States are now requested to estimate the reach of their projects and social marketing campaigns in their Final Reports. States are also asked to denote the status of any evaluation work that is included in the FY 2006 FSNE Plan. Final report instructions on page 6 and Template 1 in Appendix A reflect these changes.
 5. **Project and Social Marketing Campaign Descriptions.** The FY 2007 Guidance provides more instruction regarding the type of descriptive information needed for projects and social marketing campaigns. States should specify which target audience category the project/campaign will reach (Certified Eligibles, Likely Eligibles, etc.), how the project/campaign will focus education on FSP eligibles, and the method of implementation. Refer to pages 12-13 and Template

2 for more information.

- 6. Cash Donations.** The FY 2007 Guidance clarifies (pages 45-46) when States need to submit private cash donation waivers for FNS approval and emphasizes that such waivers must be specific as to who is donating to the State and the amount of the donation.
- 7. Indirect Cost Rates.** The FY 2007 Guidance (pages 42-43) provides more explanation on indirect cost rates and indirect cost plans and the type of documentation the State needs to keep on hand for FNS review (if needed).
- 8. References to OMB Circulars.** The Office of Management and Budget has relocated several Circulars to the Code of Federal Regulations. Citations in this Guidance reflect this change.
- 9. Budget Information by Project.** Based on requests from States, FNS has made the Budget Information by Project Table in Template 4: 2007 Nutrition Education Budget Summary available as a Microsoft Excel file. This table also includes other minor changes including a Direct Cost subtotal. The Template will continue to be available as a Microsoft Word file and Portable Document Format file. States may download the templates from the Food Stamp Nutrition Connection Web site <www.nal.usda.gov/foodstamp/National_FSNE.html> or request a copy from their FNS Regional Office. States should provide narrative to support expenses listed in the table.
- 10. Time Records.** A clarification was made to Section A.10 Time Records to more clearly state the need for volunteers to complete weekly time and effort reporting.
- 11. Nondiscrimination Statement.** The nondiscrimination statement, required on all materials developed or reprinted with FSP funds, has been updated in this Guidance (page 14). States should use this updated language as they reprint materials or develop new ones. States may download this wording electronically from the Food Stamp Nutrition Connection Web site at http://www.nal.usda.gov/foodstamp/National_FSNE.html.

Appendix B: **Reporting and Record Retention Requirements**

Form 366A-State Agency

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

Form SF-269-State Agency

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

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

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

Appendix C: **Cost Policy**

The following discusses the costs that can be approved for Federal reimbursement under an approved FSNE Plan.

Food Stamp Program Reimbursement Structure

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

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 5% or by greater than or equal to \$100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary (see State Plan Amendments page 40).

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

Allowable Costs

Allowable costs are specified under OMB regulations at 2 CFR part 225 (OMB Circular A-87), 2 CFR 220 (OMB Circular A-21), 2 CFR 215 (OMB Circular A-110) and 2 CFR 230 (OMB Circular A-122), Departmental rules at 7 CFR 3016 and FSP rules at 7 CFR 277. To be allowable, all costs charged to FNS must be valid obligations of the State, local government or sub-grantee and must be necessary and reasonable as charges under an approved FSNE plan.

State Plan Amendments

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 5% or by greater than or equal to \$100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary. In these instances, a State must submit a plan amendment for Federal approval prior to incurring the expenses to ensure that costs are allowable, reasonable and necessary. Further, if the scope of the activities in a plan changes, regardless of the impact on the planned expenditures, a State must submit a plan amendment for FNS approval. See instructions regarding plan amendments on page 3.

A. Allowable and Unallowable Administrative Expenses

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

- salaries and benefits of personnel involved in FSNE and administrative support;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of FSNE materials when no other appropriate materials exist (see pages 12-14);
- lease or rental costs;
- maintenance expenses;
- other indirect costs;
- and charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

Unallowable administrative expenses- Unallowable costs per 2 CFR 225 (OMB Circular A-87) and 2 CFR 220 (OMB Circular A-21) for State and local governments are listed below. Similar lists are found in 2 CFR 215 (OMB Circular A-110) and 2 CFR 230 (OMB Circular A-122), the OMB regulations applicable universities and non-profit organizations).

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

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

Under 2 CFR 220 (OMB Circular A-21), there are some *unallowable cost* categories in addition to those listed above:

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

Reasonable and necessary costs

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

Reasonable Costs

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

Necessary Costs

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

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

A.1 Property Procurement and Management

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

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

A.2 Indirect Cost Rates

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

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

The term "cognizant agency" pertains to an official assignment of responsibility made by OMB for reviewing and approving indirect cost rates and cost allocation plans. Normally, OMB assigns cognizance to the Federal funding agency that has the largest dollar amount involvement with the specific grantee. See definitions in Appendix D for more information on cognizant agencies.

If a cost can be directly attributed to one grant, then that cost may not be included in either an indirect cost plan computation or any cost allocation plan. Indirect cost rates are normally computed through a process where all indirect costs are added together and then divided by the Modified Total Direct Costs. This results in a percentage which is applied to each grant as their 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%. Each grant would then be charged 16% 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, they should note the indirect cost rate agreement in their State's Nutrition Education Plan. FNS may request documentation in support of the submitted indirect cost rate. The State agency should ensure that documentation from the Federally assigned cognizant agency will be available for FNS review if needed.

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 FSNE Plans, only one rate may be used for each program charged. As a result, any justification for using either the "on-campus" or "off-campus rate" must be based on where the majority of the allowable activities take place. In the case of FSNE, the allowable activities are defined as those activities that provide nutrition education to the FSP eligible population. Other activities, such as research and data analysis, are not the primary purpose of FSNE 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% of total modified direct costs, based on 2 CFR 220 (OMB Circular A-21).

Small local agencies may not have staff with the expertise to develop indirect cost rates. Local agencies that do not have a cognizant agency to review and approve their rates may apply to the State agency for approval to use a rate developed either by or for the local agency. They may obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs and may be included in the Plan budget as either direct or indirect costs. Only the proportionate share of the costs of developing the indirect cost rate may be charged to FNS. The State agency must indicate, within the FSNE 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 FSNE Plan are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement.

A.3 Waivers

Exclusivity Clause Waivers. FSNE is exclusively for the benefit of individuals that are eligible for the FSP. The term "food stamp eligible" is defined in Appendix D and is discussed in detail on pages 7-10. This policy is consistent with language in the Food Stamp Act, as amended (7 USC 2011, Section 11 (f) (1)). State agencies must target their programs to FSP eligibles. However, they may pursue an "exclusivity waiver" on a project

basis to allow certain projects that inadvertently reach other low-income individuals that are not eligible for the FSP. “Project” is defined in Appendix D as “a discrete unit of nutrition education intervention at the local level with a specifically identified low income target population”. General instructions for completing the waiver request are provided in Appendix A, Template 6. In addition, States requesting a waiver of the exclusivity regulation for FSNE activities must document, on a project basis, that:

- It is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences because it is not possible or practical to identify FSP eligibility or to specifically provide FSP eligibles with nutrition education without reaching others (e.g., social marketing campaigns and media communication).
- The project provides an efficient and effective means of reaching FSP eligibles. The waiver must indicate the projected number of people the intervention will reach, estimated number of total contacts and the number or percentage of total contacts that will be with FSP eligibles.
- Documentation is provided to ensure that at least 50 percent of the population that will receive FSNE has gross household incomes that are at or below 185 percent of the poverty guidelines or thresholds. In developing data for waiver requests, the following data may be used to calculate the extent to which the population meets the income criteria:
 - FSP, FDPIR and TANF participation data;
 - census tract information;
 - other community program participation data;
 - school lunch free and reduced price data; and
 - WIC participation data.

Asking individuals for personal income data is not an appropriate means to determine whether the target audience is low income, and goes beyond the scope of data needed for waiver purposes. Some potential sources of information include:

- State FNS Program Offices
 - American FactFinder provided by the U.S. Census Bureau at www.factfinder.census.gov.
 - Food Stamp Program Map Machine by the Economic Research Service at www.ers.usda.gov/Data/FoodStamps/
 - Common Core Data-School Meals by the National Center for Education Statistics at <http://nces.ed.gov/ccd/>
- The project will offer an educational message about the FSP, its benefits, and how to apply.

Documentation to show that each project meets these criteria must be submitted in one or more waiver requests. States may submit a separate waiver request for each project or they may submit a listing of local projects for which they are seeking waivers. Statewide waivers

are not permissible. The waiver request must contain project-specific information and supporting documentation in sufficient detail to ascertain that each project is targeted to FSP eligibles. Each waiver request will be approved or denied separately, regardless of format, on the basis of supporting documentation.

Exceptions to Requirement for Exclusivity Clause Waivers

Table I (see **pages 8-10**) provides examples showing when a waiver may or may not be needed. The following summarizes exceptions to the requirement for Exclusivity Clause Waivers:

1. Food Distribution Program on Indian Reservations (FDPIR). Because persons eligible for the FSP may participate in FDPIR in lieu of the FSP, FDPIR participants may be targeted for FSNE without waiver, and will be considered as if participating in the FSP.
2. Categorically Eligible Persons. Persons eligible for the FSP by virtue of their allowable categorical eligibility consistent with FSP regulations at 273.2(j) may be targeted for FSNE without waiver.
3. Persons with incomes less than or equal to 130% of the poverty guidelines. This income level may be considered a reasonable proxy for FSP eligibility in the case of FSNE participation in most cases. This proxy does not apply to persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C).
4. Persons receiving FSNE at FSP/TANF offices, public housing and food banks, food pantries or soup kitchens (when food is being distributed to needy persons as described on page 9). A waiver is not required for nutrition education delivered at these venues under the circumstances specified (for food banks, food pantries, and soup kitchens).

Use of Private Cash Donation Waivers. FSP regulations at 7 CFR 277.4 prohibit the consideration of private in-kind donations as well as private cash donations as a part of a State's expenditures for which FNS will reimburse 50 percent. No waiver is available for private in-kind donations. However, a waiver is permissible for private cash donations when four conditions are met:

1. no endorsements of donors or products will be given in connection with the nutrition education activities.
2. no funds will revert back to donor or benefit the donor.
3. funds are donated without restriction on use for a specific person, institution, or facility.
4. funds are to be under the State's administrative control.

Only cash donations to the State from third parties that are not operating under a formal agreement with the State to provide local FSP services are considered to be relevant to this section of the regulations. To use donated funds for FSP purposes, the State must use the

funds for reasonable and necessary program expenditures with an approved waiver from FNS. Assurances that the above conditions are met must be included in the State agency's waiver request and noted in the nutrition education plan.

Funding held by a subgrantee of the State under contract to deliver FSP services locally, such as nutrition education services, is not considered to be private cash and need not be "donated" to the State in order to be expended for FSP purposes or federally reimbursed. Rather, this funding is a financial resource of the subgrantee. Consistent with the State plan, the subgrantee may spend the cash it holds on approved nutrition education activities, and submit its billings to the State, at which point, the State may reimburse the subgrantee for 50 percent of the subgrantee's expenses.

Cash donation waivers must specify who is donating cash to the State and the amount of the donation. General blanket waivers requesting prior approval in the event the State receives a private cash donation, are not allowed. General instructions for completing the waiver request are provided in Appendix A, Template 6.

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

1. In-kind donations that are the value of volunteer time or other non-billable goods or services (e.g., there is no cash transfer between parties) are not allowable as charges to this grant if they are provided to or by a non-governmental agency or sub-grantee.
2. In-kinds from government agencies cannot be charged to another Federal grant.
3. Goods and services requiring a transfer of cash are not in-kinds. However, goods and services that require a cash reimbursement by the sub-grantee may be charged as a cost, providing the cash reimbursement is based on a legally enforceable contract or agreement between the grantee and sub-grantee. An obligation to pay must exist for a sub-grantee to have a valid claim. FNS will then reimburse 50% of the outlay incurred by the grantee or sub-grantee.
4. A grantee (the State agency) or sub-grantee cannot claim a donated service or a good as an in-kind if:
 - a) It is not allowable, reasonable, or necessary for the delivery of FSNE;
 - b) Payments are made by the State agency or sub-grantee for any of the goods and services (payments are actual outlays rather than in-kinds); or
 - c) The sub-grantee claiming the in-kind is a private organization. As specified under 7 CFR 277.4(e), only public agencies are allowed to claim in-kind charges. Because the value of in-kind donations including volunteer services to a private entity (private schools, churches, non-governmental entities, etc.), do not represent any State expenditure or outlay, FSP regulations do not permit them to be considered as a cost to the program and thus are not reimbursable.
5. A grantee or sub-grantee may claim a service or a good as an in-kind if:
 - a) It is allowable, necessary, and reasonable for the delivery of FSNE.
 - b) The sub-grantee claiming the "in-kind" is a public organization as specified under 7 CFR 277.4(e). These regulations were written in the interests of maximizing States'

ability to identify allowable **funding** sources. FNS has allowed for regulatory support to the concept that the donation of goods and services to a public entity result in a de facto State expenditure or outlay. Thus, they are reimbursable. (Note that regulations do not permit extending this interpretation to private organizations).

- c) In valuing a volunteer's time or service to a public organization, the following principles apply:
 - 1) The volunteer's wages are computed on a reasonable hourly basis in accordance with the duties being performed for FSNE, or wages are computed based on the Federal minimum hourly wage established by the United States Department of Labor;
 - 2) The volunteer records time as specified in the FSNE Guidance (Appendix C, Section A.10, Time Records); and
 - 3) The value of the volunteer's time is not being used as a match for any other Federal grant.
- d) In valuing donated goods, the following principles apply:
 - 1) The value for goods other than **publicly** owned space is computed on reasonable fair market value;
 - 2) When valuing space owned by a **public** agency, depreciation **or use allowance** is used for cost computations; and
 - 3) The value is not being used as a match for any other Federal grant.

A.5 Donations from Non-Federal Public Agencies

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

A.6 Non-Federal Public Agencies

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

The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in 7 CFR 277.4(c), can be interpreted to include "marketing orders, councils and commissions". OGC concluded that marketing orders, councils, and commissions may be included within the term, "non-Federal public agency" for the purposes of using the donation as part of State cost for Federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they are engaged. To be included as State cost, the budgetary authority must be delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage must be governmental in nature. The activities must affect the right of private parties through adjudication, rule making, investigating,

prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

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

A.7 Medical Equipment & Clinical Health Assessments

FNS has determined, based on **2 CFR 225 (OMB Circular A-87)**, that medical equipment or health services related to health assessments of recipients, obtaining clinical data on nutritional status, and chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. For example, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to administer dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.8 Gardening

Gardening is a beneficial project that leads to the economical production and consumption of healthy and fresh food. The provisions of **2 CFR 225 (OMB Circular A-87)** allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies are not allowable FSNE costs. Only educational supplies, curricula and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. (Note that participants may use program benefits (coupons/EBT) to purchase seeds and plants for gardening purposes).

A.9 Valuation of Publicly Owned Space

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

Federal requirements regarding the valuation of publicly owned space is contained in **OMB regulations at 2 CFR 225 (OMB Circular A-87), 2 CFR 220 (OMB Circular A-21), and 2 CFR PART 215 (OMB Circular A-110)** and Departmental regulations at 7 CFR 3016. The requirements indicate that in no case may publicly owned space be "donated" or billed at fair market rental rates. The only method allowable for calculating **the value** of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space regardless of whether they are direct billed or donated. The cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and

utilities. (FNS Policy Memorandum-March 9, 1998)

Example of Calculating Valuation of Publicly Owned Space-Only the depreciation or use allowance method may be used to charge FNS for use of publicly owned space.

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

A.10 Time Records

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

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

Staff Devoting 100 Percent of Time to FSNE

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

Staff Devoting Less Than 100 Percent of Time to FSNE

- Time records are required for all nutrition education **staff and volunteers** devoting less than 100 percent of their time to FSNE unless a Federally approved Random Moments Time Study is used to allocate the time spent on allowable activities. Universities and colleges that are approved for Plan Confirmation by the Department of Health and Human Services are also exempt from the time record requirement.
- Budget sections of State plans should confirm that time records are documented.
- Time worked on FSNE must be reported in hours, and not percentage of time to the project.
- A sample form for keeping time and effort documentation is available in Appendix A (see Template 8). However, States may develop their own form that includes appropriate space to enter hours spent on FSNE, date, and employee and supervisor signatures. Only time spent on FSNE needs to be entered on the form.
- If a University has a procedure for hourly documentation already in place, it may meet the reporting requirement.
- The time and effort forms **can** be maintained at the work site and **must** be available for review/audit for a period of three years.

- Grantees that have Federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities. State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS regional office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy of the time estimate. Time records need not be submitted with the plan but should be maintained by the project for audit.

When accounting for the cost of part-time staff, the total cost, including time not worked (annual and sick leave), must be computed and charged. The official accounting system used for grants and funding arrangements must be used in calculating this cost so that official accounting records reflect all of the revenue and costs of FSNE. The staff person's time spent on FSNE must be documented as specified above.

A.11 Memberships, Subscription, and Professional Activity Cost

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

A.12 Nutrition Education Reinforcement Materials

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

FNS could not relate program reinforcement materials to any of the cost items specifically mentioned in the 2 CFR 225 (OMB Circular A-87) and 2 CFR 230 (OMB Circular A-122). Consequently, FNS must apply the general rules for determining the allowability of costs, as described in OMB regulations, paramount among which are the reasonable and necessary cost tests.

Program reinforcement materials for nutrition education also must:

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

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

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

Examples of Allowable and Unallowable Program Reinforcement Materials

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

Examples of Allowable Nutrition Education Reinforcement Items:

Calendars and refrigerator magnets that contain important nutrition education messages, measuring cups, measuring spoons or other items of nominal value which reinforce an important nutrition message. Examples of available messages include, Thermy™ the food thermometers’ safety message (“It’s safe to bite when the temperature is right”), the 5 A Day Campaign, or USDA’s EAT SMART. PLAY HARD.™ Campaign.

Examples of Unallowable Nutrition Education Reinforcement Items:

Celebratory items, and items designed primarily as staff morale boosters; items (even of nominal value) that are not reasonable or necessary and/or have no nutrition education message; any program incentive item intended for persons who are not FSP eligible, or with a waiver, those potentially FSP eligible; any item costing more than \$4.00.

A.13 Physical Activity

FNS supports efforts to improve the health and fitness of our program participants consistent with the most current Dietary Guidelines for Americans, MyPyramid and MyPyramid for Kids. These efforts include:

- Activities to help participants eat a nutritious diet by providing and linking nutrition education and program benefits.
- Activities to encourage physical activity every day by promoting active living and connecting people with community-based resources funded by appropriate entities.

The provisions of 2 CFR 225 (OMB Circular A-87) allow FNS to make reasonable judgments as to what is necessary and reasonable to deliver nutrition education. Given the Dietary Guidelines for Americans, the inclusion of physical activity promotion as a part of

the FSNE is an allowable expenditure. The following is guidance on what constitutes allowable FSNE costs in support of the physical activity guideline in the Dietary Guidelines for Americans. Essentially, such allowable costs are limited to activities that educate about and promote physical activity, such as providing FSP eligibles with information and encouragement to exercise, a brief exercise demonstration, and referral to local resources.

The following form the basic principles of FNS policy on physical activity:

- Educational and program materials developed to promote and reinforce physical activity for all target audiences should include messages that link nutrition and physical activity, and the associated health benefits of active lifestyles.
- All programming such as workshops, conferences, and trainings that encourages physical activity must include a focus primarily on promotion of healthy eating behaviors. Activities may include one-time physical activity demonstration for FSP eligibles and training for staff to develop skills and to help FSP eligibles.
- FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity materials that are reasonable and necessary. All physical activity materials must include a nutrition education message that promotes healthy eating and links nutrition and physical activity.
- Existing materials, especially existing FNS materials such as Team Nutrition, Loving Support, Eat Smart. Play Hard™, etc., must be used and/or adapted whenever possible rather than developing new materials. Using or adapting successful interventions developed by others is preferable to developing new materials.
- FNS program cooperators are encouraged to coordinate with community, faith-based, youth and recreational organizations, and others whose primary mission is to make regular opportunities for physical activity accessible and to make a listing of these resources available to Program eligibles.

Examples of Unallowable Physical Activity Education and Promotion Costs

Incentives and reinforcement items must be reasonable and necessary based on established cost principles (2 CFR 225 (OMB Circular A-87), 2 CFR 230 (OMB Circular A-122) and 2 CFR 220 (OMB Circular A-21)) and criteria of specific nutrition assistance programs and may not exceed \$4.00 per unit. Costs incurred for health club or gym memberships, dues, equipment, (such as bicycles, treadmills, stair steps, weights, and the like); facilities (rental or modifications); ongoing classes, exercise leaders for ongoing exercise classes are not allowed. Note that the educational reinforcement items meeting the definition in Section A.12 above are permitted when they are of nominal value (\$4.00 or less per item).

Examples of Allowable Physical Activity Education and Promotion Costs

FSP State agencies may make physical activity education and promotion coupled with nutrition education available to FSP eligibles in a variety of economical ways.

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

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

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

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

Additional examples of acceptable physical activity promotion may include:

- Information on local sites where FSP eligibles can access a diverse range of low or no-cost activities appropriate for different ages and physical abilities.
- Physical activity bulletin boards or displays around the food stamp offices, clinics or community.
- Referral to library or web site resources.
- Development and provision of information and resource lists to FSP eligibles on how to promote safe and enjoyable physical activities. This information may also be available from:
 - Affiliates of voluntary health organizations (e.g., the American Heart Association).
 - State and local health departments.
 - Governor's Councils on Physical Fitness and Sports.
 - National Fitness Coalition
 - Coalition for Promotion of Physical Activity
 - State associations for health, physical education, recreation, and dance.
 - National Centers for Chronic Disease Prevention and Health Promotion.
 - Materials can be ordered in bulk from:

The President's Council On Physical Fitness and Sports

200 Independence Avenue SW
Room 738-H
Washington, D. C. 20201-0004
www.fitness.gov
www.presidentschallenge.org

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

- Another source of information is:

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

A.14 Medical Nutrition Therapy

This is not an allowable cost. **Funds spent on medical nutrition therapy are not reimbursable by the FSP.** Medical nutrition therapy is not within the scope of the FSP. If a food stamp educator becomes aware of the need for an individualized diet or meal plan, the educator should refer to a local physician or dietitian.

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

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

A.15 Breastfeeding

All FSNE activities that address the topic of breastfeeding must be planned and implemented in collaboration with the State WIC agency and State Breastfeeding Coordinator. The WIC program should have the lead and primary role in all breastfeeding activities with FSNE supplementing existing WIC activities. A written agreement (e.g., a Memorandum of Understanding) stating the degree of collaboration and the specific

responsibilities of WIC (i.e., staff, duties, and time) and the State should be included in the State FSNE Plan. This agreement must be signed by all collaborating agencies.

A.16 Travel and Meeting or Conference Attendance

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

- **Travel Destination** – Travel requests must be identified for in-state and out-of-state purposes. States should note the destination of the meeting, training or conference attendance (e.g., city, town, county, state).
- **Travel Purpose and Justification**
 - Justify the purpose of the travel request.
 - Describe how the travel request supports the State’s FSNE goals and objectives.
 - Demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff.
- **Number of Staff Attending**
 - Identify the number and type of staff making the travel request.
 - Justify the number and type of staff making the travel request.
 - For attendance at National level conferences, the request should be limited to no more than 4 staff persons per State.

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

A.17 Prorating Costs of Nutrition Education Activities

When a broader audience than those described in Table I, pages 8-10, benefits from a nutrition effort that is otherwise allowable under FSNE, FNS may allow prorated costs that reflect FSNE’s share of the total cost. In these situations, the calculation of FSNE’s share of the total cost is based on the number likely FSP eligibles (persons at or below 130% of poverty guidelines/thresholds with the exceptions noted in Table I on page 9) that will receive the nutrition education relative to the total population to be reached. For example, if a FSNE project will reach 100 persons and 20 of these persons have gross incomes at or below 130% of poverty guidelines, then 20% of the total costs may be counted as FSNE costs. The FSP may then reimburse the State for 50% of the FSNE costs. In other words, FSP Federal funds would reimburse half of 20% of the total costs of this project or 10% of the total project.

States must show how prorated costs were calculated, fully describe the nature of such costs and demonstrate the value of the proposed activity to FSNE. Since activities that target general audiences are often not designed with the needs of FSP eligibles in mind, the State must justify how the activity is a good vehicle for reaching FSP eligibles and changing their

nutrition-related behaviors.

A.18 College/University Students

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 the FSP and therefore not eligible to receive FSNE. However, students may be able to get food stamp benefits (and participate in FSNE) if otherwise income eligible and they:

- Get public assistance benefits under a Title IV-A program;
- Take part in a State or federally financed work study program;
- Work at least 20 hours a week;
- Are taking care of a dependent household member under the age of 6;
- Are taking care of a dependent household member over the age of 5 but under 12 and do not have adequate child care to enable them to attend school and work a minimum of 20 hours, or to take part in a State or Federally financed work study program; or
- Are assigned to or placed in a college or certain other schools through:
 - A program under the Workforce Investment Act of 1998,
 - A program under Section 236 of the Trade Act of 1974,
 - An employment and training program under the Food Stamp Act, or
 - An employment and training program operated by a State or local government.
 - Also, a single parent enrolled full time in college and taking care of a dependent household member under the age of 12 can get food stamps if otherwise eligible.

An exclusivity waiver is required for FSNE activities that do not exclusively serve students that meet the criteria outlined above.

B. Sources of State Share Program Cost

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

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

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

B.2 Private, Third-Party, Cash Donations

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

B.3 Other Federal Funds

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

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

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights

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

C.2 Disclosure and Sharing of Case File Information

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

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

C.3 Scholarships and Tuition

2 CFR 220 (OMB Circular A-21) makes a distinction between scholarships, fellowships, and other similar financial transactions, and tuition remission and similar work/study

payments. For scholarships, costs may only be charged if (1) the purpose of the scholarship is for training of selected students, and (2) approval is granted by the grantor agency. There would need to be a necessary and reasonable judgment for approval of any scholarship payment shown as a cost to FSNE. In general, this is not a cost that would be necessary and reasonable for the purposes of this grant. In the event the scholarship is based on research activity, FNS would normally not accept the cost as being necessary and reasonable. The primary function of FSNE is teaching nutrition education to food stamp **eligibles**. 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:

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

Students who are working on FSNE under a tuition remission situation must account for their time, as would any full time or part time staff. The financial review of this charge must take into account both the type of work performed and the number of hours worked. As with any charge, tuition remission can only be charged by the percentage of time that the student or employee worked on FSNE. If the student is working 50% of their time on FSNE, only 50% of the tuition may be charged to FNS. Again, a necessary and reasonable judgment must be made as to purpose of the work and its impact on FSNE.

C.4 Examples of Allowable and Unallowable Costs

The following table provides some examples of allowable and unallowable costs.

ALLOWABLE	UNALLOWABLE
Literature/Materials/Audiovisuals	
<ul style="list-style-type: none"> • The purchase of FNS nutrition education/promotion materials that address FSNE topics and are for use with FSP eligibles. • The purchase of other nutrition education materials, when there are no FNS materials available that address FSNE topics and will be used with persons eligible for the FSP. • The production of nutrition education materials, for which there <u>is no other existing comparable material</u>, that support the State’s goals and objectives for FSNE and will be distributed to FSP eligibles. It is encouraged that States collaborate with other FNS programs on the messages conveyed in and the costs of education materials. The State agency must describe the method used for allocating costs between the programs. 	<ul style="list-style-type: none"> • Costs for any nutrition education materials that have already been charged to another Federal or private program or source. • Any material that endorses or promotes brand name products or retail stores. • Manufacturer’s or store (cents off) coupons. • Influencing a store’s pricing policy. • Any activity or material to lobby or influence Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum or initiative. • Negative written, visual, or written expressions about specific foods, beverages or commodities.
Social Marketing Campaigns	
<ul style="list-style-type: none"> • Local radio and television announcements of nutrition education events for food stamp eligibles. • Appropriate social marketing campaigns that target nutrition messages to food stamp eligibles and are delivered, with an approved exclusivity waiver, in areas/venues where at least 50 percent of persons have incomes equal to or less than 185% of poverty guidelines or thresholds. 	<ul style="list-style-type: none"> • Social marketing campaigns that target the general population. In some instances, prorated costs based upon the numbers of likely FSP eligibles (\leq 130% of poverty guidelines/thresholds, with certain exceptions) that will be reached with the campaign may be allowed. • Nutrition education messages which convey negative messages or disparage specific foods, beverages or commodity, or which are not consistent with the Dietary Guidelines for Americans and MyPyramid. • Television and radio announcements/advertisements that do not include a brief message about the FSP, its benefits and how to apply.

ALLOWABLE	UNALLOWABLE
Equipment	
<ul style="list-style-type: none"> • Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. (This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment.) • Equipment shared with non-FSP users when cost-shared with those users. • Kitchen appliances only with justification of reasonable and necessary need. 	<ul style="list-style-type: none"> • Electronic equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from FNS. • Medical equipment.
Food Samples, Supplies and Provisions	
<ul style="list-style-type: none"> • Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation and display of food prepared for demonstration purposes. • Food <u>samples</u> associated with a nutrition education lesson. 	<ul style="list-style-type: none"> • Ongoing snack or food service. • Meal size portions or complete meal service. • Cost of food provided as groceries or supplemental food.
Nutrition Education	
<ul style="list-style-type: none"> • Classroom setting (salaries, space, equipment, materials) for food stamp eligibles on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class must be to provide nutrition education. If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. Schools must be public government entities for in-kind charges. • Physical activity demonstration, promotion, referral that includes a nutrition message. 	<ul style="list-style-type: none"> • Classes that are designed to provide case management or "life skills" training (e.g., classes on English as a second language, parenting, child development, crisis management, rental information). • Medical nutrition therapy and secondary prevention interventions (Refer to Appendix D, Definitions). • Weight loss classes, individualized meal plans, obesity treatment programs, etc. • Ongoing physical activity and exercise classes, equipment or facilities. (Refer to Appendix C: Physical Activity Cost Policy Section). • Clinical health screenings (i.e., cholesterol testing, body mass index and blood glucose testing, etc). • Distribution of nutrition education reinforcement items over \$4.00.

ALLOWABLE**UNALLOWABLE****Nutrition Education Continued**

- The pro rata share of costs of classes that are provided in conjunction with another program (e.g., WIC), provided the State agency describes the method for allocating costs between the programs.
- Breastfeeding education, promotion and support which is coordinated with WIC and which supplements and complements WIC services, rather than supplanting them.
- Activities where the primary objectives pertain to allowable nutrition education but brief FSP outreach messages are also shared with FSNE participants. **FSP information materials are available for free on the FNS Web site at: <http://www.fns.usda.gov/fsp/info.htm>.**

- Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.)
- Breastfeeding education, promotion and support that duplicates or otherwise is provided for under other funding sources such as WIC, EFNEP, or Head Start.
- Education provided to incarcerated or institutionalized persons that are not eligible for the FSP (i.e., persons in jails, prisons, nursing homes, mental institutions etc.).
- 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 the FSP and therefore not eligible for FSNE. For information on students that may be eligible: http://www.fns.usda.gov/fsp/applicant_recipients/students.htm
- Activities where the primary objective(s) is to conduct outreach efforts for the FSP or other programs.

Space Allocation

- Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked.
- Space donated by local school districts, but only the cost of space based on depreciation or use allowance.

- In-kind charges for space that is donated by a private third-party or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs), or the FSP, i.e. FSP county waiting room).
- Commercial rental rates cannot be used for **publicly** owned spaced.

ALLOWABLE	UNALLOWABLE
Staff and Training Costs	
<ul style="list-style-type: none"> • FSNE-related training for program delivery staff. The time volunteers of a public agency spend performing FSNE-specific duties. Time must be charged at a rate commensurate with the duties being performed. • Staff time spent delivering nutrition education to food stamp eligibles. 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 FSNE services in the community. 	<ul style="list-style-type: none"> • The time volunteers of a non-public agency (e.g., faith-based organizations, many food banks, etc.) spend performing FSNE specific duties. • A physician’s time spent distributing nutrition flyers at health fairs when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing. • University courses that are not relevant to the practical delivery of nutrition education to food stamp eligibles. • Training or development costs of food service workers or others not directly associated with delivery of FSNE.
Costs Associated with Other Activities	
<ul style="list-style-type: none"> • Reimbursement for personal costs (such as child care, meals, lodging, and transportation) for recipients of FSNE to actively participate in focus groups, needs assessments and advisory groups to inform and improve FSNE effectiveness. • Nutrition education activities that promote the selection of healthy foods from vending machines. • Participation on relevant State and local advisory panels. 	<ul style="list-style-type: none"> • Organized efforts to influence elected officials and lobbying for legislative/policy changes. • Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely FSP eligible respondents (persons with incomes less than or equal to 130% of poverty guidelines/thresholds, with certain exceptions). • Costs associated with the establishment and maintenance of environmental or policy changes, such as staffing, infrastructure, equipment, space, land, construction or supplies. • Money, vouchers or passes provided to FSNE recipients to offset personal costs incurred so that they may attend nutrition education classes (e.g., for childcare and transportation expenses). • Childcare or transportation services provided for FSNE recipients in conjunction with FSNE activities. • Reinforcement items over \$4.00. (Refer to Appendix C Cost Policy Section- Program Reinforcement Items)

Appendix D: Definitions

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

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

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

Behavior indicates action rather than knowledge or attitudes.

Behaviorally Focused Nutrition Messages are those that are (a) related to healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example encouraging breast feeding practices, or physical activity (c) related to the environmental impact of dietary practices, including safe food handling, promoting community walking groups (d) related to food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk, and (e) food security such as applying for nutrition assistance programs (i.e. WIC, FSP, Child Nutrition Programs, Food Distribution Programs, etc).

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

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. When first established, census tracts are to be as homogenous as possible with respect to population characteristics, economic status and living conditions.

Cognizant Federal Agency refers to the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item A.2 Indirect Cost Rate in Appendix C.

Organization

State Public Assistance Agencies

All Other State agencies

Educational Institution

Nonprofit Organization

Cognizant Federal Agency

Dept. of Health and Human Services (DHHS)

Federal agency identified by OMB

Department of Education, Department of Defense-Naval Research or DHHS, depending on which provided more Federal funds over the last 3 years

Normally the Federal agency with the largest dollar value of award with the organization

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

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

Food Bank means a public or charitable institution that maintains an established operation involving the provision of food or edible commodities, or the products of food or edible commodities, to food pantries, soup kitchens, hunger relief centers, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to feed needy persons on a regular basis.

Food Pantry means a public or private nonprofit organization that distributes food to low-income and unemployed households, including food from sources other than the Department of Agriculture, to relieve situations of emergency and distress.

Food Stamp Program Eligibles are persons that meet criteria for participation in the Food Stamp Program as described in Federal legislation and regulations. Persons that participate in the formal Food Stamp Program certification process and are determined eligible (e.g., Food Stamp Program participants) clearly meet these criteria. Some persons that are eligible for the Food Stamp Program do not apply. These non-participating eligibles are not as easy to identify because they typically have not participated in a formal certification process. Food Stamp Program Eligibles are the recognized target audience for Food Stamp Nutrition Education.

Full-Time Equivalent (FTE) employment, as defined by the Federal government, means the total number of straight-time hours (i.e., not including overtime pay or holiday hours) worked by employees divided by the number of compensable hours (2,080 hours) in the Fiscal year. According to this definition, annual leave, sick leave, compensatory time off and other approved leave categories are considered “hours worked” for purposes of defining FTE employment. States may define FTEs differently than the Federal standard. States may use their own definition of FTEs in their FSNE Plan, but must clearly state the definition and the basis for the calculation.

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

Indirect cost rate is a rate typically computed by summing all indirect costs then divided the total by the Modified Total Direct Costs. The resulting percentage is applied to each grant to determine their share of the indirect or overhead costs. Indirect cost rates applied in the FSNE plan must 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 must be acceptable to FNS.

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

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

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

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

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.
- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; parenteral nutrition delivered via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients.

Medical Nutrition Therapy Services are not allowable FSNE costs.

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

Non-Federal Public Agency is a State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such as organizations that are chartered by State or local governments for public purpose.

Nutrition Education is a set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition-related behaviors conducive to health and well being for those on a limited budget.

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

Outreach is providing information or assistance to individuals who might be eligible for the Food Stamp Program in order to help them make an informed decision whether to apply for the Program.

State FSP agencies seeking Federal funding for Outreach activities may annually submit an Outreach plan to FNS for approval.

Plan Confirmation means a time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of Plan Confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of Plan Confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS (Normally this will not be an issue since audits normally occur at least every two years). For further information refer to **2 CFR 220 (OMB Circular A-21)**. If approval through the audit process has not occurred, the Division of Cost Allocation, DHHS, should be contacted as follows:

The U.S. Department of Health and Human Services
Office of the Secretary
Division of Cost Allocation
200 Independence Ave, S.W.
Washington, D.C. 20201
Telephone: 202-401-2808
Toll Free: 1-877-696-6775

Poverty Guidelines are an administrative version of the Federal poverty measure and are issued annually by the Department of Health and Human Services in the Federal Register. Sometimes referred to as the Federal Poverty Level, these guidelines are often used to set eligibility for certain programs. <http://aspe.hhs.gov/poverty/index.shtml>.

Poverty Thresholds are the statistical version of the Federal poverty measure and are released annually by the Census Bureau. They are used to estimate the number of persons in poverty in the United States or in states and regions. <http://www.census.gov/hhes/www/poverty.html>

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

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

Public Housing, as defined by the U.S. Department of Housing and Urban Development, is apartments for low-income people, operated by local housing agencies.

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

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

Social Marketing is defined as a disciplined, consumer-focused, research-based process to plan, develop, implement and evaluate interventions, programs and multiple channels of communications designed to influence the voluntary behavior or a large number of people in the target audience. (Adapted from Alan Andreasen 1995 and Social Marketing Division of Society for Nutrition Education.)

Soup Kitchen means a public or charitable institution that, as an integral part of the normal activities of the institution, maintains an established feeding operation to provide food to needy homeless persons on a regular basis.

State Agency means the agency of State government, including the local offices thereof, which is responsible for the administration of the Federally aided public assistance programs within the State, and in those States where such assistance programs are operated on a decentralized basis, it includes the counterpart local agencies which administer such assistance programs for the State agency.

State Nutrition Action Plans (SNAP) are statewide cross-program nutrition education plans for the USDA nutrition assistance programs. These plans focus on a single goal and promote collaboration and use of integrated nutrition education approaches across FNS Programs to connect the efforts and resources of all the USDA programs to achieve that goal. Since February 2003, State teams consisting of key staff representing USDA nutrition assistance programs have worked together to develop and implement their action plans. SNAP plans, achievements and contact information are available on the FNS Web site at <http://www.fns.usda.gov/oane/SNAP/SNAP.htm>.

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

Target Audience refers to Food Stamp Program Eligibles.

Appendix E:
List of Abbreviations

CFR- Code of Federal Regulations
EFNEP- Expanded Food and Nutrition Program
FDPIR- Food Distribution Program on Indian Reservations
FSNC- Food Stamp Nutrition Connection
FSNE- Food Stamp Nutrition Education
FNS- Food and Nutrition Service
FSP- Food Stamp Program
FY- Federal Fiscal Year
ITO- Indian Tribal Organization
MOU- Memorandum of Understanding
NAL- National Agricultural Library
OGC- U.S. Department of Agriculture Office of General Council
OMB- Office of Management and Budget
PDF- Portable Document Format
PSA- Public Service Announcement
SNAP- State Nutrition Action Plan
SSI- Supplemental Security Income
TANF- Temporary Assistance for Needy Families
WIC- Special Supplemental Food Program for Women, Infants and Children
USDA- United States Department of Agriculture

Appendix F: **Food Stamp Nutrition Connection Web Site**

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

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

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

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

Food Stamp Nutrition Connection
Food and Nutrition Information Center
USDA/ARS National Agricultural Library
10301 Baltimore Avenue, Suite 105
Beltsville, MD 20705-2351

Or you may use the following form as a handy way to submit items.

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



Food Stamp Nutrition Connection Resource Sharing Form

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

Part 1. About You

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

1. Your name:
2. Your e-mail address:
3. Which best describes your relationship to the resource you are submitting?
 - I developed this material (complete sections I-III)
 - I distribute or handle ordering for this material (complete sections I, II and IV)
 - I use this resource but I am not the developer or distributor of this material (complete sections I and II)

Part II. Resource Information

Please tell us about the material you are submitting.

1. Resource Title: _____
2. Developer/ Author(s):

3. Primary Author's Affiliation: _____
4. Publication/Revision Date: _____ Edition: _____
5. How is this material used?
 - Consumer Education
 - Staff Training
 - Background Information/Research
6. What languages are available?

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

8. Briefly, describe your resource.

9. How do we contact the publisher/distributor?

Publisher Name _____

Street Address _____

City _____ State _____ Zip Code _____

Telephone _____ E-mail _____

Part III. Author/ Developer Information

Please share information about how this material was developed.

1. Please describe the target audience.

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

name of the formula used _____ score/grade level _____

3. Please describe any pilot studies conducted.

4. Does this material include a validated evaluation tool? Yes No

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

Comments:

Part IV. Publisher/Distributor Information

1. ISBN number (if applicable): _____

2. Please indicate how this material may be used by other educators.

May copy for educational purposes without prior permission.

Permission needed to copy.

May not copy.

3. How can educators order this material?

4. What is the cost of this material? (price/unit) _____

5. Can this material be ordered in quantity? Yes No

6. Describe any bulk discounts available.

Comments:

Thank you for sharing your resource!

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

Appendix G:
Timeline for FY 2007 Plans

February 28, 2006	FY 2007 Guidance Available to States
April 1-August 15, 2006	States May Submit FY 2007 Plans to the FNS Regional Office
August 15, 2006	FY 2007 Plans Due to FNS Regional Office
October 1, 2006	States May Receive Response/Contingency Approval for FY 2007 Plan from Region if plans are submitted in an appropriate format and all necessary data is provided. Plans that are not in the format of the Guidance and/or do not supply data requested in the Guidance may require additional review and hence a longer approval time. Extraneous information and unnecessary documentation may also hinder plan review or result in a denial.
November 30, 2006	FY 2006 Final Report Due to FNS Regional Office
June 30, 2007	Last date for submission of FY 2007 Plan Amendments with New/Significantly Revised Activities to FNS Regional Office
November 30, 2007	FY 2007 Final Report Due to FNS Regional Office