



# **Supplemental Nutrition Assistance Program (SNAP): State Outreach Plan Guidance**

July 2017

# Table of Contents

<b>SECTION A: GUIDANCE</b>	<b>6</b>
<b>1. Introduction and Background</b>	<b>6</b>
1.1 What is the purpose of this document?	6
1.2 Why should my State agency have an outreach plan rather than simply doing outreach?	7
<b>2. Coordination and Collaboration</b>	<b>7</b>
<b>3. Outreach Plan Format and Submission</b>	<b>8</b>
3.1. What format should a State agency use for the outreach plan?	8
3.2. What information is included in the outreach plan template?	9
3.3. When should my State agency submit an outreach plan?	10
3.4. What reports are required?	10
3.5. Can the outreach plan cover more than one fiscal year?	11
3.6. Can a project involve multiple subrecipients?	12
3.7. Can an organization be included in multiple State outreach plans?	12
3.8. Can a for-profit organization be included in an outreach plan?	12
3.9. Can my State agency amend the outreach plan after approval?	13
3.10. What is my State agency’s responsibility after our outreach plan is approved?	13
3.11. How can my State agency expedite the approval of our outreach plan?	13
3.12. Who can my State agency contact for help developing our outreach plan?	14
<b>SECTION B: POLICY</b>	<b>15</b>
<b>1. Allowable Activities</b>	<b>15</b>
1.1 What outreach activities are allowable for reimbursement under SNAP?	15
1.2 What outreach activities are not reimbursable with Federal funds and should not be included in the outreach plan?	17
1.3. What outreach activities are not permitted?	18
1.4. Should nutrition education activities be included in the outreach plan?	18
1.5. Should a contingency plan for outreach during a disaster be included in the outreach plan?	19
1.6. Can a subrecipient assist with outreach during a D-SNAP?	19
<b>2. Funding</b>	<b>20</b>

2.1. What is the funding structure of a State outreach plan?	20
2.2. What is the timeline for reimbursement of expenditures?	21
<b>3. Sources of State Agency Funding</b>	<b>21</b>
3.1. What sources of funding can be used for State agency expenditures?	21
3.2. What sources of funding cannot be used for State agency expenditures?	22
<b>4. Direct Cost Policy</b>	<b>23</b>
4.1. What are direct costs?	23
4.2. Are there other cost categories?	23
4.3. How should my State agency determine if costs are appropriate?	23
4.4. What administrative expenses are allowable?	24
4.5. Is there a funding floor (minimum) in an outreach project's allowable costs?	24
4.6. Is there a funding ceiling (maximum) in an outreach project's allowable costs?	25
4.7. What administrative expenses are unallowable?	25
4.8. Will FNS withhold reimbursement if the State agency or subrecipient does not meet the deliverables and/or the targets identified in the outreach project?	26
4.9. How are reasonable staff wages and benefits determined?	26
4.10. How does one allocate staff time when using a joint application or pre-screening tool?	26
4.11. How does one allocate staff time if a client completes just the SNAP portion of an application?	27
4.12. Are subscriptions and professional activity costs allowable?	27
4.13. Are scholarships and tuition remission allowable?	27
4.14. Is purchase of outreach reinforcements allowable?	28
4.15. What kind of building space expenses may be incurred?	28
4.16. How should a value be set on building space owned by the State agency?	29
4.17. What is the policy for calculating privately owned building space rented by the State agency?	29
4.18. What is the calculation for publicly owned building space rented by the State agency?	30
4.19. What is the calculation for building space expenses incurred by subrecipients?	30
4.20. How should a value be set for volunteer services?	30
4.21. How should a value be set for donated goods?	31
4.22. What are the rules for property procurement and management?	31
<b>5. Indirect Cost Policy</b>	<b>31</b>
5.1. What are indirect costs?	31

5.2. Which cost items are inherently indirect?	32
5.3. What is acceptable documentation of an approved indirect cost plan?	32
5.4. What is an example of an indirect cost rate already approved by a Federal cognizant agency that should be used in the outreach plan?	32
5.5. What if a State agency partners with a subrecipient that does not have an approved indirect cost rate plan or cost allocation plan?	33
5.6. What are the Federal requirements for a subrecipient using the Federal de minimis rate of 10 percent?	33
5.7. What is involved if a subrecipient wants to develop its own indirect cost rate plan?	33
5.8. Can a subrecipient organization use the approved indirect cost rate plan of the State agency?	34
5.9. Can a State agency or subrecipient charge for building space as a direct cost on line 'l' of the budget summary and use the 10 percent Federal de minimis rate for indirect costs (line 't' of the budget worksheet)?	34
5.10. What are the indirect cost considerations for institutions of higher learning?	34
5.11. Why would a subrecipient choose not to use an indirect cost rate?	35
5.12. In a project involving multiple subrecipients, does the lead subrecipient make the decision concerning the indirect cost rate for all subrecipients?	35
5.13. If one organization is in multiple outreach plans, should it use the same indirect cost rate for each project?	35
<b>6. Record Retention and Disclosure Policy</b>	<b>35</b>
6.1. What are the applicable record retention policies?	35
6.2. What is the disclosure policy?	35
<b>7. Materials Development Policy</b>	<b>36</b>
7.1. What are the requirements for development of outreach materials?	36
7.2. What are the requirements for materials that have limited space?	37
7.3. What are the requirements for use of the SNAP logo?	37
7.4. When should materials be provided in languages other than English?	37
<b>8. Reporting Policy</b>	<b>38</b>
8.1. How should employees record their time?	38
<b>SECTION C: OUTREACH PLAN TEMPLATE</b>	<b>39</b>
<b>1. Cover Page/Contact Information/Signatures</b>	<b>39</b>
<b>2. Statement of Need</b>	<b>40</b>

<b>3. Outreach Plan Summaries</b>	<b>41</b>
<b>4. Outreach Project Details</b>	<b>42</b>
<b>5. Outreach Project Staffing Details</b>	<b>43</b>
<b>6. Outreach Project Budget Details and Narrative</b>	<b>44</b>
<b>7. Budget Summary</b>	<b>46</b>
<b>8. Assurances</b>	<b>48</b>
<b>9. Attachments</b>	<b>49</b>
<b>SECTION D: FORMATS FOR REPORTS AND WAIVER REQUESTS</b>	<b>50</b>
<b>1. Final Report Format</b>	<b>50</b>
<b>2. Promising Practices Report Format</b>	<b>51</b>
<b>3. Time and Effort Format</b>	<b>53</b>
<b>4. Waiver Request Format</b>	<b>55</b>
<b>SECTION E: RESOURCES</b>	<b>57</b>
<b>1. Glossary</b>	<b>57</b>
<b>2. SNAP Web Resources</b>	<b>61</b>
Table 1: Outreach Plan Timeline for October 1 Start .....	11
Table 2: Allowable Outreach Activities with Examples.....	15
Table 3: Outreach Plan Summary Example.....	41
Table 4: Outreach Project Details Instructions .....	42
Table 5: Outreach Project Staffing Costs.....	43
Table 6: Sample Budget Detail Table.....	45
Table 7: Line Item Budget Summary.....	47
Table 8: SNAP Web Resources .....	61
Sample Text 1: Nondiscrimination Statement .....	36
Sample Text 2: Funding Credit Statement.....	37

# SECTION A: GUIDANCE

## **1. Introduction and Background**

The Supplemental Nutrition Assistance Program (SNAP) is the cornerstone of the Nation's nutrition safety net and an investment in our future. SNAP helps low-income people buy the food they need for good health. Although SNAP is a Federal program, it is administered by State agencies and local social and human service offices.

State agencies administering SNAP have the option to conduct program informational activities (outreach) to inform low-income households about the availability, eligibility requirements, application procedures and the benefits of SNAP (Section 11(e) (1) (A) of The Food and Nutrition Act of 2008, as amended). SNAP outreach can also correct myths and misperceptions about SNAP and enable potentially eligible people to make an informed decision about whether or not to apply.

The State agency is responsible for administering outreach plan activities and managing outreach funds. The Food and Nutrition Service (FNS) reimburses State agencies for up to 50 percent of allowable administrative costs, including program informational activities.

State agencies interested in outreach activities should submit an outreach plan to the appropriate Regional Office for review and approval. Plans do not have to be statewide and can target specific geographic locations or populations. State agencies often partner with local community organizations to provide outreach services. This document refers to community organizations as **subrecipients**, because the State agency may reimburse community organizations for allowable outreach activities with Federal funds when a formal agreement is in place. State agencies must include the activities of subrecipients in the State outreach plan.

State agencies should submit their outreach plans to FNS several months prior to the start of a new fiscal year and by August 15 at the latest.

### **1.1 What is the purpose of this document?**

This document is for State agencies that administer SNAP to use in developing and submitting their SNAP outreach plan to FNS for approval. This document provides State agencies:

- policies and instructions to make decisions about the content of their outreach plans;
- a template to use to develop and present their plan;
- resources and tools for developing a final report, reporting promising practices, and requesting a waiver.

Updates to this guidance will be made by FNS as needed via policy memorandum. Outreach policy memoranda can be found online at <https://www.fns.usda.gov/outreach/state-outreach-plan-guidance>.

## 1.2 Why should my State agency have an outreach plan rather than simply doing outreach?

**Outreach Can Help Improve Access to SNAP Resulting in Multiple Benefits for Participants, States, and Communities:** SNAP offers the opportunity for improved nutrition and progress toward economic self-sufficiency for participants who become stronger members of the community. However, some low income people, especially seniors, working people, and legal immigrants, who are eligible for SNAP do not participate and thus forego assistance that could stretch their food dollars and help improve their nutrition.

### **Economic Benefits for States and Communities**

Every \$1 in new SNAP benefits generates up to \$1.80 in economic activity.

**State Outreach Plans Document and Structure Outreach Activities:** Because the process of developing a State outreach plan for approval by FNS involves setting goals, action steps, timelines, and evaluation measures, it helps structure outreach activities in a logical way and targets them to where they are needed most.

The outreach plan creates a means to look back at what has been done, celebrate accomplishments, assess miscalculations, and revise strategies as needed to make progress in the future. Such evaluation may be more difficult when outreach is conducted without an outreach plan.

**State Outreach Plans Facilitate Partnership Building and Networking:** When a State develops an outreach plan, they create an opportunity to reach out to vital community partners serving hungry families in local neighborhoods. By working together on common goals, State and community partners can stretch limited resources and ensure that informational activities target those most in need in the most effective way possible.

**State Outreach Plans Contribute to the Documentation of Promising Practices:** State outreach plans lead to further collection of promising practices and lessons learned. Through the outreach plan process, both State agencies and FNS are better informed about the extent of outreach and have a greater level of detailed knowledge to share with others.

## **2. Coordination and Collaboration**

State agencies may coordinate their outreach projects with other publicly or privately funded partners. Coordination and collaborations at the community level provide the capacity for reaching outreach goals, providing program information, and supporting the FNS mission of reaching low-income families and individuals. These partnerships are a valuable resource for designing, planning, implementing, and evaluating outreach activities.

A State agency does not have to have a financial obligation with community partners in order to coordinate services. However, since community partners may engage in allowable activities that are eligible for Federal reimbursement, State agencies may want to establish expectations and obligations through a Memorandum of Understanding (MOU) or a contract.

If a State agency decides to contract with a community partner, the partner becomes a subrecipient and is eligible for Federal reimbursement of up to 50 percent of allowable expenses. However, the State agency is ultimately responsible for the use of Federal reimbursement funds. Here is how it works:

- FNS Regional Office staff approve a State outreach plan and place approved levels of outreach funding into the State's Letter of Credit (LOC). Outreach funds, like all other Federal funds, are subject to availability. FNS can only allocate what Congress and the Office of Management and Budget make available.
- State agencies withdraw Federal funds from the LOC to support actual financial expenditures. Every Federal dollar drawn from the LOC must be linked to an allowable outlay or expenditure.
- State agencies review invoices and reimburse subrecipients on a monthly or quarterly basis, depending on the terms of the contract.

States agencies must show in their outreach plan that SNAP outreach funding will remain under their administrative control. State agencies must describe the relationship between the State agency and subrecipients, including roles and responsibilities. Copies of contracts and/or MOUs must be available to FNS upon request.

### **3. Outreach Plan Format and Submission**

#### **3.1. What format should a State agency use for the outreach plan?**

To simplify the outreach plan development process for State agencies, an outreach plan template is provided in this guidance in Section C. The format is also downloadable at <https://www.fns.usda.gov/outreach/state-outreach-plan-guidance>. State agencies can use the template as a workbook and complete each part as instructed. When the template is complete, State agencies will have an outreach plan that includes all the elements needed for review and is ready for submission to the FNS Regional Offices.

A subrecipient should not transmit an outreach project proposal or amendment directly to an FNS Regional Office. Project proposals and amendments are to be transmitted from the State agency to the FNS Regional Office.

Read this guidance thoroughly before filling out the template. This guidance outlines allowable activities, describes cost policy and provides other important information that will help State agencies complete the template and expedite the approval of their State outreach plans.

The template included in Section C is optional. State agencies that choose not to use it and instead submit an outreach plan using their own format should include the same information as provided in the sample format, including the relevant signatures and a statement of assurances. Lack of information in an outreach plan will delay its approval.

All pages of the outreach plan must be numbered consecutively, including the attachments. Number the cover page/signature page as page one. Limit the length of your outreach plan to the essential items.



The State agency must enter the amount of Federal reimbursement that FNS approves on line 16 of FNS-366A, Budget Projection Statement. The amount on the FNS-366A must match the approved budget. States submit FNS 366A electronically through SNAP's Food Programs Reporting System (FPRS).

### 3.2. What information is included in the outreach plan template?

- **Cover Page/Signature Page:** Contains required signatures from the State SNAP agency director (or Commissioner) and fiscal representative and basic contact information. Number the cover page as page 1.
- **Statement of Need:** Provides a description of the need to conduct SNAP outreach within your State. Includes SNAP participation rates, the incidence of hunger and food insecurity and other relevant data. Be sure to reference the source and date of the data.
- **Outreach Plan Summaries:** Provides an overview of the State SNAP agency's proposed plan activities. Assign a project number and title to each activity to serve as a reference throughout the outreach plan.
- **Outreach Project Description:** Provides specific, comprehensive details on each outreach project including goals, timelines, a clear description of the activity and how it will be implemented, roles of subrecipients, locations, and evaluation plans.
- **Outreach Project Staffing Summary:** Provides a listing of paid staff working on each outreach project. It includes the title and name of the employees and the amount of time spent on outreach. The project staffing summary is used to help build the project budget detail.
- **Outreach Project Budget Details and Narrative:** Provides both a line item budget and budget narrative for each project. The budget narrative describes how the figures in the line item budget were calculated in simple terms. The budget narrative should provide a justification for all line items. The outreach project budgets are used to build the budget summary. Include the tax identification number for each subrecipient requesting federal reimbursement for SNAP outreach. If an organization is not in good standing with the Internal Revenue Service (IRS) or the IRS does not recognize the organization's status as a non-profit organization, FNS may not approve the project.
- **Budget Summary:** Provides a budgetary overview of the entire outreach plan. The line item budget includes columns for non-Federal public funds; non-Federal, non-public funds; Federal funds; and total funds. The rows are for the categories of expenditures that the State agencies will incur during implementation of the outreach plan, such as salary and benefits, copying/printing, telephone, equipment, supplies, space, travel, and contracts.
- **Assurances:** Provides documentation that an authorized representative understands key outreach plan obligations.
- **Attachments:** Attach the State agency's most recently approved indirect cost rate agreement for outreach activities conducted by the State agency. If any subrecipient has an approved indirect cost rate agreement, attach it as well.

### **3.3. When should my State agency submit an outreach plan?**

SNAP is funded annually on a Federal fiscal year basis, from October 1 to September 30. Submitting your plan to the appropriate FNS Regional Office no later than August 15 assures that it can be reviewed in a timely manner and that your State can receive a full 12 months of funding for the upcoming fiscal year. States are encouraged to submit plans on this schedule whenever possible so that they can benefit from a full year's funding approval.

State agencies can submit outreach plans any time during the fiscal year. However, funds can only be obligated through September 30 of the current fiscal year. Therefore, plans that are approved at other times during the year will not receive a full 12 months of funding for the current fiscal year.

States may submit plans that cover more than one fiscal year but budgets are still approved on an annual Federal fiscal year basis. More information on multiple year plans is provided below.

FNS will approve a plan in full, in part, or not at all. If only portions of the plan are approvable, FNS will approve those portions. FNS will not provide contingent approval of an outreach plan.

After approval, State agencies may proceed with approved activities with assurance that they will be reimbursed. State agencies choosing to start activities without FNS approval risk not receiving reimbursement for these activities. FNS will not consider retroactive reimbursement of outreach activities that are not approved on or before September 30 of the current fiscal year.

Upon final approval of the outreach plan by FNS, funds are made available through the State agency's Letter of Credit.

The outreach plan must contain an original signature of the State agency director (or Commissioner) and a State agency fiscal representative. The plan should be submitted to the FNS Regional Office as an electronic document (either as a Microsoft Word document or Portable Document Format (PDF) file).

### **3.4. What reports are required?**

The State agency must report outreach expenditures on SF-425 (SNAP Federal Financial Report). This report must be submitted through FPRS 30 days after the end of each quarter. A final expenditure report is due **December 31** of each year. Use Column 17 (Outreach) on SF-425 (SNAP) to report outreach expenditures. This information is typically reported by financial staff at the State agency. Subrecipients do not have access to the State's SF-425.

A final narrative report is due **December 31** following the completion of the outreach plan year. Please see Section D. Formats for Reports and Waiver Requests for a suggested format. State agencies are responsible for consolidating reports and information from subrecipients. State agencies must submit the report to the FNS Regional Office as an electronic document (either as a Microsoft Word document or as a Portable Document Format (PDF) file).

**Table 1: Outreach Plan Timeline for October 1 Start**

<b>Product</b>	<b>Due Date</b>
Outreach Plan to Regional Office	No later than August 15
Approval from Regional Office	No later than September 30
Quarterly Expenditures 1	January 31
Quarterly Expenditures 2	April 30
Last Day to Submit Amendments	July 1
Quarterly Expenditures 3	July 31
Quarterly Expenditures 4	October 31
Final Expenditure Report	December 31
Final Narrative Report	December 31

**3.5. Can the outreach plan cover more than one fiscal year?**

With Regional Office approval, an outreach plan may cover up to three fiscal years. A multi-year outreach plan should have consistent goals over the length of the plan. Activities may build on existing infrastructure and progress made over time. If the scope of the outreach plan changes during the length of the plan, an amendment must be submitted for Regional Office review and approval before reimbursement may be drawn down.

FNS recommends that a State agency wanting to pursue a multi-year plan consult with its Regional Office before it begins preparing the plan. FNS Regional Office staff will be able to advise on the complexities of a multi-year plan and what, given the State’s resources and experience, should be considered from the start.

For State agencies that have received Regional Office approval for a multi-year plan, budgets must be approved annually. An approval for a three-year outreach plan does not constitute an approval for a three year budget or for future year funding. Annual budgets must be submitted each year for Regional Office review and approval.

If an outreach plan lasts more than one fiscal year, the following must be submitted each year before August 15 for review and approval by the Regional Office before reimbursement may be drawn down for the next fiscal year:

- Cover Page/Signature Page (Template Section 1)
- Outreach project staffing summary for each project (Template Section 5);
- Outreach project budget detail and narrative for each project (Template Section 6);
- Budget summary (Template Section 7).

A final narrative report must be submitted each year before December 31.

### **3.6. Can a project involve multiple subrecipients?**

A project can include multiple subrecipients. Each subrecipient will need to prepare its own budget and narrative to explain the project costs. The project as a whole needs a budget summary. The State agency is responsible for coordinating a project with multiple subrecipients or it should designate one organization to be a lead organization for the purpose of developing the budget summary, organizing invoices and distributing the reimbursements. There should be a contract or MOU signed by all subrecipients. It is critical that all subrecipients in a multi-partner project have frequent communication among the partners.

Sometimes, a subrecipient may contract out services to yet another provider. Regardless of an organization's level of involvement in SNAP outreach or its degree of separation from the State agency, all recipients of Federal funds must follow the guidance outlined in this document, SNAP regulations, and OMB Circulars.

### **3.7. Can an organization be included in multiple State outreach plans?**

Yes. Each project involving an organization that is included in multiple State outreach plans should contain several written statements.

Statement 1: Identify the other State agencies that the organization partners with and provide an assurance that costs identified in the plan do not duplicate costs in the other plans.

Statement 2: Identify the percentage of shared costs for the categories of expense in other State plans and provide an assurance that the sum of the shared costs will not exceed 100 percent.

**Example:** An organization has some of its headquarters staff involved in three State outreach plans. The Project Budget Staffing Detail will contain a statement in each of the three outreach plans for each staff person involved in multiple State plans:

Mr. James Laurel will spend 15 percent of his time on the SNAP Outreach Program in Alabama, 10 percent on the proposed SNAP Participation Program in Oklahoma and 5 percent on the proposed SNAP Participation Program in New Jersey. He will spend less than 100 percent of staff time on SNAP funded projects. He is expected to spend all remaining time on non-SNAP projects.

**Note:** Projects involving organizations in multiple State outreach plans may involve coordination among multiple FNS Regional Offices for approval. If appropriate information is not provided in the initial submission plan, the review process may take longer to ensure no duplication of costs and combined shared costs do not exceed 100 percent.

### **3.8. Can a for-profit organization be included in an outreach plan?**

In general, no, although there are a few situations where a for-profit entity, like a farmers' market, may be an appropriate subrecipient. If your State agency has questions about whether or not a particular for-profit organization can be included in an outreach plan, contact your Regional Office.

### **3.9. Can my State agency amend the outreach plan after approval?**

If you would like to make significant changes to your outreach plan, you must submit plan revisions to your Regional Office prior to implementation of the planned activities.

Amendments to approved outreach plans must be submitted for Federal approval before any reimbursement for these expenditures may be drawn down.

Significant changes include:

- Major changes in components (e.g., adding, deleting, or modifying a component);
- Significant changes in State policy (e.g., major changes to State outreach rules);
- Requests for additional 50 percent Federal reimbursement funds; or
- Changes in the location of approved activities or in the community partners conducting the work.

This review is to ensure that these additional activities and their associated costs are allowable, reasonable, and necessary.

Amendments must be submitted at least 30 days prior to planned implementation. FNS recommends that amendments be submitted no later than July 1 to ensure adequate time for review, approval and implementation of the proposed activities during the remainder of the fiscal year.

### **3.10. What is my State agency's responsibility after our outreach plan is approved?**

The State agency is:

- Accountable for the contents of its outreach plan and for the subsequent implementation of the outreach plan;
- Responsible for making allowable cost determinations;
- Responsible for monitoring projects to ensure that outreach funds are spent appropriately and all activities are carried out according to the plan;
- Liable for repayment of Federal funds should costs later be determined unallowable;
- Responsible for technical assistance to any contractors (or subrecipients) to ensure that all projects support the State agency's outreach goals and to explain which expenses are eligible for reimbursement; and
- Responsible for conducting civil rights training annually to State agency staff and subrecipient staff that conduct SNAP outreach in order to comply with FNS Instruction 113-1 Civil Rights Compliance and Enforcement – Nutrition Programs and Activities.

### **3.11. How can my State agency expedite the approval of our outreach plan?**

To expedite approval of your outreach plan, FNS recommends the following:

- Review this guidance before developing your outreach plan;

- Check your outreach plan for consistency with this guidance and any subsequent policy memoranda. Both the State agency program staff and the fiscal officer should review the outreach plan to verify that all activities and costs are allowable, reasonable and necessary;
- Make any necessary waiver requests. Justify and document the request using the SNAP waiver form found in Section E: Formats for Reports and Waiver Requests;
- Use the Section C: Outreach templates provided. They are designed to ensure that all necessary information is presented in your outreach plan. FNS recommends using a spreadsheet for the Line Item Budget Summary (Template 7);
- Use at least a twelve-point font, single spacing, one-inch margins and page numbering starting with the cover page as page 1;
- Provide clear and concise descriptions and justifications for requested items;
- Check for math errors;
- Ensure that the appropriate State agency officials review the outreach plan (including the budget), approve, sign and date the outreach plan; and
- Submit your outreach plan to your FNS Regional Office early (before August 15th).

### **3.12. Who can my State agency contact for help developing our outreach plan?**

FNS Regional Office program and financial management staff are available to provide technical and other assistance to State agencies in developing outreach plans. Contacts are listed here: <https://www.fns.usda.gov/snap/how-can-i-contact-you>.

## SECTION B: POLICY

### 1. Allowable Activities

#### 1.1 What outreach activities are allowable for reimbursement under SNAP?

State agency outreach costs may include expenditures for work performed by State agency employees, including county employees where SNAP is county-administered, and/or payments for services performed under contract to the State agency. Although State outreach plans are suggested for either scenario, if a State agency contracts with a subrecipient for SNAP outreach, the use of a State outreach plan is highly encouraged to formalize the process for the reasons noted in Section A of this document.

FNS encourages State agencies to strengthen their impact by including a combination of supportive and reinforcing activities in their outreach plans. Supportive activities provide services and informational resources to eligible groups, whereas reinforcing activities extend and strengthen those supportive activities.

For example: Pre-screening targets program eligibility information to people most in need. Pre-screening and application assistance together can help likely eligible low-income households fill out an application if they choose to apply.

The following are examples of allowable outreach activities:

**Table 2: Allowable Outreach Activities with Examples**

Allowable Activity	Example
Eligibility pre-screening	Use of a paper or electronic tool to inform potential applicants that they may be eligible and how much they could potentially receive.
Application assistance	Assistance completing the application, including delivery of the application to the local SNAP office.
Assistance obtaining application verification documents	Informing potential clients which documents may be needed and making copies of verification documents.
Information dissemination in locations where low-income people gather	Distribution of program information at the employers of low wage workers.
Outreach exhibit or booth at a community event	Set up and staffing of an outreach booth at the annual community fair or local farmers' market.
Conducting outreach workshops with community organizations at their locations	SNAP outreach fair at a senior center.

<b>Allowable Activity</b>	<b>Example</b>
Informational websites and other social media sites that provide factual information that is not intended to persuade an individual to apply for SNAP. Note that radio, television, and billboard advertisements are not permitted to promote SNAP benefits and enrollment.	Purchase of publishing software to create informational content for social media or websites.
Information stating where SNAP benefits are accepted	A large sign at a farmers' market stating SNAP benefits are accepted at the market.
Factual information correcting myths or misconceptions about SNAP	Conversing with a potential applicant at an outreach table about eligibility requirements.
Toll-free information line or web address to provide information to potential clients	A statewide 1-800 information number to connect potential clients to their local office.
Development of printed educational or informational materials for potential clients	<ul style="list-style-type: none"> <li>• Development and printing of a brochure providing information to low-income households about the availability, eligibility requirements, application procedures, and benefits of SNAP.</li> <li>• Business cards with the outreach subrecipients' contact information and the website of the State online SNAP application and/or SNAP information phone number.</li> <li>• Bookmarks with State or Federal SNAP hotline number and/or website. One side of the bookmark can be in English and the reverse side in another language.</li> </ul>
Use or customization of FNS outreach materials for clients	Hiring a graphic design shop to customize and print the FNS posters with the phone number of the local office.
Training or train-the-trainer programs for SNAP outreach workers	Training of local community partners to run outreach seminars by the primary outreach contractor.
Translation of materials and bilingual accommodation to convey eligibility requirements and assist persons with limited English proficiency during the application process	Translation of an outreach envelope into the predominant non-English language in the community.



Allowable Activity	Example
Contingent activities related to Disaster SNAP (D-SNAP) operations	<p>Informational Activities:</p> <ul style="list-style-type: none"> <li>• Funding a toll-free hotline with staff to respond or recorded messages with D-SNAP information; and</li> <li>• Radio, television, or billboard messages with D-SNAP information (Note: these are only allowed for D-SNAP).</li> </ul> <p>Onsite Assistance at D-SNAP sites:</p> <ul style="list-style-type: none"> <li>• Pre-screen applicants;</li> <li>• Direct applicants to the right queue;</li> <li>• Help applicants complete applications;</li> <li>• Provide translation services.</li> </ul>

**1.2 What outreach activities are not reimbursable with Federal funds and should not be included in the outreach plan?**

These activities are not reimbursable with Federal funds under SNAP, although they may be funded through other mechanisms. Because these activities are not supported by Federal funds, costs associated with these activities cannot be counted as an outlay towards SNAP. FNS reimburses State agencies for 50 percent of all allowable outreach costs. Unallowable costs cannot be charged to the Federal government or put up as a non-Federal share toward 50 percent reimbursement.

- **Recruitment activities designed to persuade an individual to apply for SNAP benefits.** Prohibited recruitment activities are those designed to persuade an individual to apply for SNAP benefits through the use of persuasive practices. Persuasive practices constitute coercing or pressuring an individual to apply, or providing incentives to fill out an application.
- **Radio, television, and billboard advertisements that promote SNAP benefits and enrollment.** This prohibition on using Federal funds does not apply to advertisements for Disaster SNAP (D-SNAP). This prohibition also does not apply to social media, so long as the message is not a recruitment activity designed to persuade people to apply for SNAP benefits.
- **Any agreements with foreign governments** designed to promote SNAP benefits and enrollment.
- **Determining eligibility of a SNAP applicant.** This is a certification activity and is the responsibility of State merit employees. Certification activities are not included in outreach plans.
- Activities related to authorizing retailers for EBT.

- Activities that solely benefit programs other than SNAP, including Temporary Aid for Needy Families (TANF) and Medicaid. Activities that benefit multiple programs must be appropriately cost allocated.
- Acting as an authorized representative for applying, receiving SNAP benefits at issuance, or food purchasing.
- Transportation of clients to or from the local SNAP office or provisions of tokens, vouchers or similar items for transportation of clients to or from the local SNAP office. For example, a transit agency could donate bus vouchers for use by potential SNAP clients to travel back and forth to the local SNAP office at no expense to the State agency.

### **1.3. What outreach activities are not permitted?**

These activities are prohibited for any entity that receives Federal funds from the Food and Nutrition Act of 2008 (FNA), as amended.

- Compensating staff for outreach activities based on the number of people who apply for SNAP as a result of that worker's efforts. For example, paying a staff person \$10 for each application they help a client complete.
- Interfering during the certification interview or at other times to campaign on behalf of specific applicants or recipients. However, outreach workers may be present to provide support or help explain complicated terms.

### **1.4. Should nutrition education activities be included in the outreach plan?**

SNAP education (SNAP-Ed) and SNAP outreach are different programs with their own goals and funding streams. The primary purpose of the outreach plan is to provide program information to inform low-income households about the availability, eligibility requirements, application procedures, and benefits of SNAP. State SNAP-Ed Plans are funded through the Nutrition Education and Obesity Prevention Grant Program. They outline activities that improve the likelihood that low-income individuals will make healthy dietary choices within a limited budget and choose physically active lifestyles consistent with the current *Dietary Guidelines for Americans*, the current *Physical Activity Guidelines for Americans*, and the U.S. Department of Agriculture's food guidance system, which is MyPlate.

The primary purpose of SNAP-Ed is to promote healthy habits as well as to prevent diet-related chronic disease. This is done by implementing interventions that incorporate face-to-face education (referred to as direct education); social marketing campaigns; and interventions which change policies, systems, and environmental settings at the State and local level.

Outreach activities may include a nutrition message as long as the primary purpose and focus of the activities remains providing program information. Nutrition information is of great interest to many consumers, including households that are eligible for or receiving SNAP benefits. Outreach messages that include nutrition information highlight one of the many ways that the program supports healthy eating and reduces food insecurity.

FNS encourages State or local staff working on SNAP outreach activities to collaborate with the State SNAP-Ed Agency and SNAP-Ed Implementing Agencies and its partners to incorporate nutrition education when and where it is appropriate. Examples of venues where the purpose and activities of nutrition education and outreach can dovetail include the following: food banks, farmers markets, community centers, or grocery store events.

### **1.5. Should a contingency plan for outreach during a disaster be included in the outreach plan?**

A State agency may include contingency plans for SNAP outreach during a disaster in the state outreach plan or in the state D-SNAP plan. The underlying assumption of a contingency plan is that activities will remain similar during or in the wake of a disaster until normal program operations resume. However, it is important to consider that the level of staffing and service may change due to a disaster.

A contingency plan would indicate whether the State agency or subrecipient intends to continue providing outreach services during or immediately following a disaster. If a State agency or subrecipient commits more resources to SNAP outreach during a disaster and incurs high costs, the State may need to submit a plan amendment to adjust its annual budget after it determines the cost of the disaster to its outreach program.

### **1.6. Can a subrecipient assist with outreach during a D-SNAP?**

The Disaster Supplemental Nutrition Assistance Program (D-SNAP) is a distinct program from SNAP that provides temporary food assistance for households affected by a natural disaster. D-SNAP provides one month of benefits to eligible disaster survivors and can facilitate the issuance of supplemental benefits for ongoing SNAP households. An affected area must receive a Presidential declaration of “Major Disaster” with Individual Assistance in order to receive approval to operate a D-SNAP. The FNS National Office approves D-SNAP requests. FNS Regional Office staff approve D-SNAP outreach activities.

Planning ahead is critical to effective disaster response. State agencies must have plans in place for how they will reach out to the survivors of a natural disaster to let them know about the availability of D-SNAP. State agencies include these activities in their D-SNAP plan, which is submitted to FNS annually on August 15. Allowable outreach activities during a disaster include all of the following:

- Distribution of information about the provisions of the D-SNAP to disaster victims
- Television, radio, billboard, and social media outlet advertisements about D-SNAP assistance
- Distribution of information to media outlets to let disaster victims know where and how to apply for D-SNAP assistance
- Translation of such information into other languages
- On-site greeting
- Application assistance
- Eligibility pre-screening

- Human comfort assistance (e.g., distributing food/water, assist applicants with disabilities and the elderly)

State agencies may receive reimbursement for outreach activities conducted to support a D-SNAP following a disaster. Subrecipients that conduct outreach to support a D-SNAP must have a pre-approved plan or agreement in place with the State in order to receive reimbursement for those efforts. If a State agency wishes to partner with a subrecipient during a disaster, the State agency must submit information on and receive approval of a D-SNAP project, including activities and tracking mechanisms (time sheets). FNS will reimburse the cost of D-SNAP outreach up to 50 percent. The guidance for allowable costs and activities are the same for regular outreach and D-SNAP outreach, with the exception that television, radio, and billboard advertisements are allowed for D-SNAP outreach.

Outreach partners can play a vital role by communicating D-SNAP information. The roles and responsibilities of outreach partners in a D-SNAP should be outlined and included in both contingency plans and the State's D-SNAP plan. As each D-SNAP is different, FNS recommends one State agency point of contact for D-SNAP outreach partners to ensure messages are consistent and timely. Just like operations under normal SNAP, outreach partners need to track staff time, use agreed-upon direct costs, and apply the approved indirect cost rate.

For additional information on D-SNAP, see the D-SNAP Guidance:

[https://www.fns.usda.gov/sites/default/files/D-SNAP\\_handbook\\_0.pdf](https://www.fns.usda.gov/sites/default/files/D-SNAP_handbook_0.pdf)

For tools and ideas on outreach activities during a disaster, see the Disaster SNAP Toolkit:

[https://www.fns.usda.gov/sites/default/files/D-SNAP\\_Guidance\\_Handbook\\_Toolkit.pdf](https://www.fns.usda.gov/sites/default/files/D-SNAP_Guidance_Handbook_Toolkit.pdf)

## **2. Funding**

### **2.1. What is the funding structure of a State outreach plan?**

State agencies are reimbursed up to 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved activities (Section 16 of The Food and Nutrition Act of 2008, as amended). Outreach is an allowable administrative cost to SNAP.

SNAP is not a match program in which every dollar of State agency funds is paired with a dollar of FNS funds to pay expenditures. It is a reimbursement program in which State agencies pay approved, reasonable and necessary administrative costs (including for outreach) and are reimbursed for up to 50 percent of those expenditures by FNS.

As previously noted, the State agency may conduct outreach activities on its own or contract with a subrecipient to conduct the activities. The subrecipient must bill the State agency according to the terms of the contract and FNS will reimburse up to 50 percent of the cost outlay.

The State agency and its subrecipient must maintain records for three years to support costs claimed (7 CFR 277.12(a)). State agencies and subrecipients may retain records in paper or electronic format (2 CFR 200.300 and 2 CFR 200.335).

Federal reimbursement is subject to the availability of Federal funds.

## 2.2. What is the timeline for reimbursement of expenditures?

Expenditures are reimbursed out of the fiscal year in which the funds were obligated. Project obligations must be established in the fiscal year the funds are appropriated, however, disbursements against the obligations may occur after the fiscal year closes.

State agencies have a two year deadline to claim prior year costs. Allowable costs may be reimbursed in the following fiscal year if:

- The outreach activity overlaps fiscal years; or
- Payment for services delivered during the fiscal year was delayed.

## 3. Sources of State Agency Funding

### 3.1. What sources of funding can be used for State agency expenditures?

- **State agency (public) cash may be used.**
- **Cash contributed or donated by other non-Federal public agencies.** The donation or contribution costs must not be claimed by another Federal program or used to match another Federal program.

What is a non-Federal public agency?

An organization of State or local government supported by funds from general tax revenues of a State or locality and allocated by an appropriate budgetary authority (a State legislature, or a county or local government.)

- **In-kind donations from public agencies (7 CFR 277.4(e)).** The donation of goods and services by a public entity to the State agency results in a de facto State agency expenditure or outlay and is thus considered reimbursable. *Note:* in-kind donations from private entities are not reimbursable.

What is an in-kind donation?

The value of volunteer time or other non-billable goods or services. There is no cash transfer between parties.

- **Financial resources of subrecipients.** Consistent with the State outreach plan, subrecipients may spend the cash they hold on approved outreach activities and then submit their invoices to the State agency. The State agency may seek reimbursement for such expenditures from FNS and reimburse the subrecipients under the terms of each subrecipient contract. Funds held by a subrecipient under contract with the State agency to deliver SNAP services are not considered private cash and need not be “donated” to the State agency in order to be expended for SNAP purposes or reimbursed by FNS (see Private cash donations below).

### 3.2. What sources of funding cannot be used for State agency expenditures?

The following sources of funding are not eligible for Federal reimbursement. They can be used, however, if they are not charged as costs under the State outreach plan.

- **Private cash donations.** This source of funding is prohibited as part of a State agency's expenditures for which FNS will reimburse 50 percent unless a waiver has been approved. (See Section E for the waiver request format.)

Only private cash donations to the State agency from third parties not operating under a formal agreement with the State agency to provide local SNAP services are relevant to this section.

A waiver for private cash donations may be granted by FNS Regional Offices when four conditions are demonstrated in the waiver request to be met:

1. No endorsements of donors or products will be given.
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 under the State agency's administrative control.

Assurances that the above conditions are met must be included in the State agency's waiver request and noted in the outreach plan. Cash donation waiver requests must specify the donor and the donation amount. General waivers requesting prior approval in the event the State agency might receive a private cash donation are not allowed.

#### **Private Cash Donation: No Waiver Needed**

A local food bank hosts a community walk-a-thon to raise money for their end hunger activities. The proceeds are their revenue. The proceeds may be used for the SNAP activities that the food bank has agreed to do under contract with the State. The local food bank submits its billings to the State agency and is reimbursed with SNAP funds according to the contract. No waiver is required in this case.

#### **Private Cash Donation: Waiver Needed**

A private organization is donating cash to a local county office to support new outreach efforts. The donating organization seeks no endorsement, will not get any of the funds back, and has not set any restrictions on the funds other than that they be used for outreach activities. A waiver is required and should be submitted to the Regional offices with the required assurances.

- **In-kind donations from a private entity.** An in-kind donation by a private entity is not considered a State agency expenditure; therefore, it is not considered a cost and is not reimbursable (7 CFR 277.4(e)). No waiver is available that would allow for private in-kind donations to be used. Examples of private in-kind donations are space, equipment, volunteer time from private entities such as community and faith-based organizations, and food banks or pantries. Note that when filling out the Budget Worksheets, only values related to outreach projects using State agency staff or resources should be listed

in the Budget Summary column (b), “Public In-Kind Funds.” This column should not be used for in-kind donations from private entities, as they are not allowable for Federal reimbursement.

- **Federal funds from other Federal assistance programs.** The only exception is if the funds are specifically authorized by legislation. For example, Indian Tribal Organizations may have Federal funds that can be used.

#### **4. Direct Cost Policy**

##### **4.1. What are direct costs?**

Direct costs are defined in 2 CFR Part 200.413 as costs that can be identified specifically with a particular final cost objective such as:

- staff salaries and benefits of employees for the time devoted and identified specifically to SNAP outreach;
- cost of materials acquired, consumed, or expended specifically for the intended purpose (i.e. SNAP outreach);
- equipment and other approved capital expenditures; and
- travel expenses incurred specifically to carry out SNAP outreach.

##### **4.2. Are there other cost categories?**

Outreach budgets may include indirect costs as well. Indirect costs are costs incurred by a State agency or a subrecipient in support of allowable activities that are directly charged to sponsoring Federal or State agencies. Indirect costs are covered in the following section.

##### **4.3. How should my State agency determine if costs are appropriate?**

All costs must be **allowable, reasonable, and necessary**. All costs reimbursed by FNS must be valid obligations of the State agency, local government, or subrecipient.

Office of Management and Budget (OMB) regulations, Departmental rules, and SNAP rules define what costs are allowable.

Where can I find the rules and regulations on allowable costs?

OMB regulations: 2 CFR 200  
Departmental rules: 2 CFR 400  
SNAP rules: 7 CFR 277

**Reasonable** costs are those that:

- Provide a program benefit generally commensurate with the amount incurred;
- Are in proportion with other program costs for the function;
- Have a high priority relative to other demands; and
- Are what a prudent person would incur in like circumstances.

**Necessary** costs are those that:

- Are needed to carry out essential functions;
- Cannot be avoided without adverse impact on program operations;
- Do not duplicate existing efforts; and
- Are the net cost after applicable credits.
  - Example: An organization receives a 5 percent discount for paying for an item with cash that has a list price of \$100, so the organization only pays \$95. The organization must identify the cost of the item as \$95 in the SNAP budget.

#### **4.4 What administrative expenses are allowable?**

Allowable administrative costs are operational costs for outreach, including all administrative expenses that are reasonable and necessary to operate approved outreach activities.

Allowable administrative expenses include:

- Salaries and benefits of personnel involved in outreach and administrative support;
- Office equipment, supplies, postage, and copying/printing costs;
- Development and production of outreach materials when no other appropriate materials exist. Outreach materials can include contact cards also known as business cards. To be allowable, the term “SNAP” or applicable State program name must be included on the contact card;
- Lease or rental costs;
- Maintenance expenses;
- Other indirect costs; and
- Charges for travel for the purpose of fulfilling the approved outreach plan objectives based on official State, local or university travel regulations. Some State agencies only allow the use of a State rate for personally owned vehicles (POV). Other State agencies allow the choice of using the State POV rate or the rate the IRS announces annually as the federal standard POV rate to calculate the cost of operating a vehicle for business travel. See the current IRS rate for business miles at: <https://www.irs.gov/tax-professionals/standard-mileage-rates>

Note: A subrecipient, under contract with a State agency, has to sign an agreement that capital expenditure(s) will only be used for SNAP outreach, otherwise FNS will disallow the expenditure(s).

#### **4.5. Is there a funding floor (minimum) in an outreach project’s allowable costs?**

FNS reimburses up to 50 percent of allowable outreach expenditures. There is no minimum spending requirement for State agencies or subrecipients.



#### **4.6. Is there a funding ceiling (maximum) in an outreach project's allowable costs?**

Congress and the Office of Management and Budget (OMB) make funding available each year to support State administrative costs, which include outreach. The total amount of funding available is subject to this allocation. However, FNS does not have State-by-State limits on outreach funding. At the State level, outreach budgets are limited to the amount of funds a State agency or subrecipient are able to obligate and outlay in order to receive a 50 percent reimbursement.

#### **4.7. What administrative expenses are unallowable?**

Unallowable costs per 2 CFR 200 for State and local governments include:

- Bad debts, uncollected accounts or claims, and related costs.
- Contributions to an emergency reserve or similar provision for unforeseen events (contingencies). (Note: These are not insurance payments which are allowable.)
- Contributions and donations (usually these are political in nature).
- Costs that are primarily for entertainment, amusement or social activities. (Note: Meals are cited in the OMB regulations as unallowable but within the context of training, meals might be allowable.)
- Fines, violations or penalties for failure to comply with Federal, State, or Local laws.
- Costs of general government, such as the Governor's office. Costs that may be directly charged to a Federal grant may be allowable; such as if a person assigned to the governor's office devotes 100 percent of his/her time to SNAP. Each situation, however, must be judged on its own merit.
- Payments to third parties as part of an indemnification agreement.
- Losses not covered by permissible insurance.
- Legislative expenses.
- Shortfalls in one grant cannot be charged to another Federal grant (Recovery of Costs under Federal Funding Agreements). (Note: 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 allocation basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic beverages.
- Advertising and public relations unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant. (Note: Paid media buys for educational purposes via an outreach program are not precluded by this provision, but note that radio, television and billboard advertisements that promote SNAP benefits and enrollment are unallowable costs under SNAP regulations.)
- Alumni activities.
- Commencement and convocations.
- Legal fees that 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.
- Fundraising and investment management.

- Interest costs, with certain exceptions.
- Political party expenses.
- Costs incurred before approval of the outreach plan (pre-agreement costs).
- Scholarships and student aid.
- Student activity costs.
- Travel is allowable but with restrictions as to amount and level of transportation cost (for example, no first class tickets).

#### **4.8. Will FNS withhold reimbursement if the State agency or subrecipient does not meet the deliverables and/or the targets identified in the outreach project?**

FNS reimburses up to 50 percent of allowable expenditures on SNAP outreach. State agencies and subrecipients may include set deliverables and/or targets in the State outreach plan, but FNS will not penalize State agencies if these targets are not met. As a reminder, there must be valid cost outlays in order for a State agency to claim Federal reimbursement.

In addition, the State agency or subrecipients may not base staff compensation for outreach activities based on the number of people who apply for SNAP. This prohibition does not preclude a State agency or subrecipient from establishing project goals that include targets, but staff compensation may not be tied to these targets. Any entity that receives Federal funds from the Food and Nutrition Act of 2008 (FNA), as amended, is prohibited from tying staff compensation to the number of people who apply for SNAP.

#### **4.9. How are reasonable staff wages and benefits determined?**

Staff wages and benefits are set on a reasonable hourly basis in line with the duties being performed for the outreach plan, or the Federal minimum hourly wages established by the United States Department of Labor. The wages under the outreach plan are not necessarily the same as wages paid to the individual when they perform the duties for which they may be credentialed. Their benefits and wages must relate to the outreach task they perform.

Staff time claimed for outreach cannot be used as a reimbursement item for any other Federal grant. Staff wages eligible for reimbursement may not be based on the number of people that apply for SNAP (e.g., a set fee for every application submitted by the staff person). Hourly wages or other forms of compensation for time spent performing allowable outreach activities are reimbursable. No entity that receives funding under the FNA may pay staff per application, regardless of the source of funding for staff wages.

#### **4.10. How does one allocate staff time when using a joint application or pre-screening tool?**

A joint application may include several different programs for low-income households (SNAP, Medicaid, cash-assistance, child care subsidies, etc). If a project includes staff time helping applicants complete pre-screenings or applications for more than one program on the joint application, the cost of staff time must be shared across the programs included on the application. This is called cost-allocation, a requirement of 2 CFR 200, Subpart E.

Time sheets or random-moment time study can be used to capture staff time spent on SNAP outreach activities. Most State agencies have methods to determine how staff time is spent. However, FNS understands that subrecipients doing SNAP outreach for the first time may not have the systems in place to evaluate staff time in this manner.

To estimate staff resources for the project budget, a subrecipient may use the State agency's cost-allocation method for joint applications if the subrecipient is serving a similar population. After the project is approved and in operation, the subrecipient should use time sheets, a random moment time study, or other methods as approved by FNS to track actual staff time spent on the SNAP portion of the application.

As discussed above, a State agency or subrecipient may not base staff compensation on the number of people who apply for SNAP. This holds true in the case of integrated applications. If any entity pays staff based on the number of people who filled out an integrated application, that entity may not receive any Federal funds under the FNA.

#### **4.11. How does one allocate staff time if a client completes just the SNAP portion of an application?**

When a client completes just the SNAP portion of an application, all of the staff person's time assisting the client may be charged to SNAP, so long as those staff payments are not based on the number of people who applied. However, if the household chooses to apply for other programs in addition to SNAP, staff time must be allocated across those programs.

#### **4.12. Are subscriptions and professional activity costs allowable?**

Cost of memberships for the institution (staff who work directly on the outreach project) in business, technical, and professional organizations are allowable. The cost must be prorated according to the percentage of time spent by the employees working on outreach and consistent with the effort to promote the provision of quality SNAP outreach (2 CFR 200.)

Professional registration or license fees paid by individuals are not allowable since the fees are considered personal expenses, not institutional expenses.

Conference fees and related travel expenses must be justified and reasonable. The conference attendance must have a direct link to the activities in the plan and the provision of quality SNAP outreach.

#### **4.13. Are scholarships and tuition remission allowable?**

With regard to reimbursement, there is a distinction between scholarships, fellowships, and other similar financial transactions, and tuition remission and similar work study payments (2 CFR 200).

Scholarship costs are allowable if the purpose of the scholarship is for training of selected students, and approval is granted by FNS. Scholarship payments must be necessary and reasonable for the delivery of SNAP outreach. Generally, scholarships, including scholarships for research, are not reasonable and necessary for SNAP outreach.

Tuition remission may be allowable in whole or in part, depending on the situation. It must also be reasonable and necessary for the outreach work being done.

Tuition remission may be allowable if:

- A bona fide employer-employee relationship exists between the student and the institution for the work performed.

- The tuition or other payments are reasonable compensation for work performed and are conditioned explicitly upon the performance of necessary work.
- The institution's practice is to similarly compensate students in non-Federally funded activities and Federally funded activities.
- The student who receives tuition remission for SNAP outreach accounts for his or her time. The financial review of this charge takes into account the type of work performed and the number of hours worked.
- Tuition remission is charged according to the percentage of time the student worked on SNAP outreach.

#### **4.14. Is purchase of outreach reinforcements allowable?**

Outreach reinforcements are items (such as magnets, pencils, pens, seed packets, recipe cards, or notepads) of an educational or informational nature containing an outreach message (such as a phone number, office address, website address, or online application link) which are given to low income people potentially eligible for SNAP benefits. Reinforcements are not to be used to incentivize people to apply for benefits. Reinforcements should be made available to all potentially eligible individuals regardless of whether or not they choose to apply for benefits.

To be allowable, such items must:

- Have a direct relationship to program objectives;
- Be reasonable and necessary;
- Be given to potentially eligible clients, regardless if they apply;
- Contain an outreach message that enables the person to follow up and take action; and
- Be of nominal value (\$5.00 or less per item).

The following items are **not** allowable:

- Celebratory items;
- Food;
- Items for staff;
- Items that cost more than \$5;
- Items intended as rewards for pre-screening or completing an application;
- Items used to incentivize potentially eligible people to apply for benefits;
- Items with no outreach messages; and
- Unreasonable or unnecessary items.

FNS discourages reinforcement items that resemble food items such as erasers, magnets or stress balls in the shape and color of food items like fruits or vegetables, as children may confuse them with genuine food and accidentally ingest the reinforcements.

#### **4.15. What kind of building space expenses may be incurred?**

A State agency or subrecipient can incur expenses related to four possible types of building space:

- space in a publicly (government) owned building;
- space in a publicly (government) rented building;

- space in a privately owned building; or
- space in a privately rented building.

#### **4.16. How should a value be set on building space owned by the State agency?**

The costs of space owned by the State agency (publicly owned) may only be recovered with a depreciation schedule, plus applicable charges for utilities, maintenance, and general upkeep. Cost for space owned by a public entity cannot be reimbursed based on private market rental rates, regardless of whether it is direct billed or donated. (2 CFR 200.436 and FNS Policy Memorandum-March 9, 1998)

SNAP outreach share of the costs should be calculated using the percentage of square footage used for outreach. Use allowance is no longer allowable under 2 CFR 200.

#### **4.17. What is the policy for calculating privately owned building space rented by the State agency?**

##### **Example: Project Budget Narrative for a Project Involving One Privately Rented Building:**

Here is an example assuming that 6 of the 10 staff in a rented building are involved with SNAP outreach. The 6 staff average 21% of their time on SNAP outreach. Note that staff salaries are not used in the calculation.

- Total square feet occupied = 5,000 sq ft
- Total staff = 10; SNAP Outreach staff = 6;  $6 \div 10 = .6$
- $5,000 \text{ sq ft} \times .6 \text{ staff} = 3,000 \text{ sq ft}$

If staff average only 21% of their time on SNAP Outreach, then  $3,000 \text{ sq ft} \times .21 = 630 \text{ sq ft}$  that can be charged to the SNAP Outreach program.  $630 \div 5,000 = .126$

If rent is \$100,000 per year then  $\$100,000 \times .126 = \$12,600$  that can be budgeted for SNAP Outreach building space.

##### **Example: Project Budget Narrative for a Project Involving Two Privately Rented Buildings**

There are two calculations for this example. The first is a calculation involving multiple persons at a building conducting outreach, and the second is a calculation involving one person at a separate location conducting outreach. A Budget Narrative documenting the building space calculation(s) should be part of each outreach plan project. Note that staff salaries are not used in the calculation. Below are the calculations for each location.

Calculation for: Main Office space: Location: 123 Main Street, Main Office, MyState (multiple people at location)

- Total square feet occupied = 5,000 sq ft
- Total staff = 10; SNAP Outreach staff = 6;
- SNAP outreach staff percentage (SNAP outreach staff  $\div$  total staff) =  $6 \div 10 = 60\%$
- Square footage used by SNAP outreach staff = 3,000 sq ft
- Average % of time each SNAP staff member devotes to SNAP = 40%
- Chargeable SNAP square feet (average % of time times square footage used by SNAP outreach staff):  $40\% \text{ times } 3000 \text{ sf} = 1200 \text{ sq ft}$
- % of square feet chargeable to SNAP:  $(1200 \div 5000) = 24\%$

- Yearly Rent: \$250,000
- Main Office SNAP Occupancy (total rent times % of square feet chargeable to SNAP):  
24% times \$250,000 = \$60,000

Calculation for Satellite Office Space. Location: 99 Eastern Blvd, Mytown, MyState (1 person at satellite location)

- Total Square Feet: 200 sq ft
- Total Staff: 1
- SNAP outreach staff: 1
- SNAP outreach staff percentage (SNAP outreach staff ÷ total staff):  $1 \div 1 = 100\%$
- Square footage used by SNAP outreach staff: 200 sq ft
- Average % of time each SNAP staff member devotes to SNAP Program: 50%
- Chargeable SNAP square feet (average % of time times square footage used by SNAP outreach staff):  $50\% \times 200 \text{ sq ft} = 100 \text{ sq ft}$
- % of square feet chargeable to SNAP ( $100 \text{ sf} \div 200 \text{ sf}$ ) = 50%
- Yearly Rent: \$22,000
- Satellite Office SNAP Occupancy (total rent times % of square feet chargeable to SNAP):  $22,000 \text{ times } 50\% = \$11,000$

Total for Main Office Space and Satellite Location:  $\$60,000 + \$11,000 = \$71,000$

#### **4.18. What is the calculation for publicly owned building space rented by the State agency?**

The calculation is the same for privately rented building space.

#### **4.19. What is the calculation for building space expenses incurred by subrecipients?**

If the subrecipient owns the space it occupies, it incurs building-related costs and claims SNAP reimbursement for the portion allocable to SNAP Outreach. Examples of such cost items include depreciation, maintenance, security, taxes, insurance, utilities, etc. Such costs are generally parallel to those incurred by the State agency for space it owns and occupies (as outlined in item 4.16, above).

If the subrecipient occupies space rented from another entity, rent is the principal occupancy cost for which it claims SNAP reimbursement from the State agency. The landlord sets the subrecipient's periodic rental payment to recover the cost items (depreciation, maintenance, security, taxes, insurance, utility, etc.) and also to provide for a profit. However, some lease agreements may provide for the tenant (that is, the subrecipient) to pay one or more of those cost items directly; the principal example is utilities.

#### **4.20. How should a value be set for volunteer services?**

As described earlier in this section, volunteer services to private organizations are not eligible for Federal reimbursement. Use the following principles to set a value for volunteer service to a **public organization**:

- Compute the volunteer's wages on a reasonable hourly basis in accordance with the duties being performed for outreach or based on the Federal minimum hourly wage established by the United States Department of Labor;

- Record time for the volunteer (see Section D); and
- Do not use the value of the volunteer's time as a match for any other Federal grant.

#### **4.21. How should a value be set for donated goods?**

Use the following principles to set a value for donated goods to a **public organization**:

- Compute the value for goods (other than publicly owned space) on reasonable fair market value; and
- Do not use the value of the donated good as a match for any other Federal grant.

#### **4.22. What are the rules for property procurement and management?**

Prior Federal approval must be received before the State agency may procure or request reimbursement for equipment valued at more than \$5,000. Review and approval of equipment purchases are normally conducted during review of the proposed budget when the outreach plan is submitted to the appropriate Regional Office. Budget reviews 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.

### **5. Indirect Cost Policy**

#### **5.1. What are indirect costs?**

Indirect costs are costs incurred by a State agency or a subrecipient in support of allowable activities that are directly charged to sponsoring Federal or State agencies. Indirect costs are often a single amount expressed as a percentage in a project budget. Indirect costs are also called overhead costs.

Indirect costs are determined either through an approved indirect cost rate or cost allocation plan that details how the costs are to be shared by the funding agencies.

**Indirect cost rates** are documented through an indirect cost plan approved by a cognizant agency. Indirect cost rate plans are usually associated with larger entities. Small and mid-size subrecipients acting as State agency contractors may not have an approved indirect cost plan.

A **cost allocation plan**, also approved by a cognizant agency, is a more extensive plan that combines many different allocations. Cost allocation plans are most often used by larger grantees.

### What is a cognizant agency?

A cognizant agency is the Federal agency recognized by the Office of Management and Budget (OMB) as having the predominant interest in terms of program dollars. FNS is the cognizant agency for a few State agencies although the U.S. Department of Health and Human Services is the cognizant agency for most. The Federal agency that provides the most Federal money becomes the cognizant agency for that organization.

If State agency or a subrecipient has an approved indirect cost plan or cost allocation plan, a copy should be included in the State's outreach plan. FNS may request additional documentation in support of the submitted indirect cost rate. The State agency and/or subrecipients should ensure that documentation from the Federally assigned cognizant agency is available for FNS review if needed.

#### **5.2. Which cost items are inherently indirect?**

Very few costs are indirect. Most of the cost outlays associated with a project are direct costs. Classification as direct or indirect normally depends on treatment in the accounting system prescribed by the State agency. Examples of indirect costs may include:

- Staff that support general office administrative functions;
- Financial staff that handle all billing activities; and
- General building maintenance and utility expenses.

#### **5.3. What is acceptable documentation of an approved indirect cost plan?**

Supporting documentation can consist of a scanned letter or electronic correspondence from the cognizant agency to the State agency.

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

A subrecipient may have an indirect cost rate already approved by a Federal cognizant agency because it may receive Federal funding for other activities directly from the Federal government.

#### **5.4. What is an example of an indirect cost rate already approved by a Federal cognizant agency that should be used in the outreach plan?**

One example is a subrecipient that has an indirect cost rate plan approved for its SNAP Nutrition Education Plan activities. The same indirect cost rate should be used in both the SNAP Nutrition Education Plan and the outreach plan.



### **5.5. What if a State agency partners with a subrecipient that does not have an approved indirect cost rate plan or cost allocation plan?**

FNS has determined that under 2 CFR 200.331, the prime grantee (in this case, the State agency) is responsible for review of indirect costs of their subrecipients unless the subrecipient has an approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government.

In the absence of an approved indirect cost rate plan, a State agency and its subrecipient can make one of three choices each Federal fiscal year. The first two choices assume that a subrecipient has overhead costs that the project benefits from and that are not included in the direct cost category.

- Choice 1: Use the federal de minimis rate of 10 percent (see following question)
- Choice 2: Seek approval from the cognizant agency to use an indirect cost rate developed for the project.
- Choice 3: Use no rate (zero) and do not ask for reimbursement of indirect costs.

### **5.6. What are the Federal requirements for a subrecipient using the Federal de minimis rate of 10 percent?**

A subrecipient must have indirect costs that benefit the project, which are not already recouped through direct costs charged to the project. There are some small projects in which all costs are directly charged.

The 10 percent rate is the Federal de minimis indirect cost rate that can be used on Federally funded projects in the absence of any rate ever being approved by a cognizant agency. The 10 percent standard rate may be used indefinitely.

On the budget worksheet, the 10 percent rate is the rate used on line 't' of the budget times the subtotal of direct costs line 's'. The formula for line 't' would be 0.10 times line 's'.

The 10 percent rate is not to replace a rate approved by a cognizant agency. It is possible that a State agency or subrecipient has an approved indirect cost rate less than 10 percent. The correct rate to use is the current rate approved by the cognizant agency, even if it is lower than 10 percent.

If a State agency or subrecipient elects to use the 10 percent indirect cost rate, it must provide a statement about the types of costs it is seeking to recover through use of the de minimis rate. The types of costs included in this statement are then compared to the direct costs charged to the grant. The same costs (such as supervisors, administrative support, utilities) cannot be included in both categories.

### **5.7. What is involved if a subrecipient wants to develop its own indirect cost rate plan?**

If a subrecipient does not have an approved indirect cost rate or cost allocation plan from a cognizant entity, the subrecipient may seek approval from the State agency to use a rate developed by or for it. The State agency must indicate its acceptance of the subrecipient's indirect cost rate in the outreach plan. If the State agency does not accept the indirect cost rate,

the FNS Regional Office also will not accept the rate. In addition, the FNS Regional Office may accept or reject the rate based on the rate computation documents provided.

The State agency should retain documentation of its indirect cost rate review process for FNS review if needed. In the event a State agency has approved a plan which is later determined to be unacceptable, indirect costs charged through that plan may be disallowed.

Contracted accounting services to develop an indirect cost rate are an allowable program cost. Such costs may be included in the outreach plan budget as either direct or indirect costs. Note that only the proportionate share of the costs of developing the indirect cost rate for SNAP outreach may be charged.

If the State agency approves a rate in excess of 10 percent, then supporting documentation should be provided to FNS. FNS will not approve this portion of the budget until supporting documentation of the requested rate above 10 percent is received and found acceptable.

**5.8. Can a subrecipient organization use the approved indirect cost rate plan of the State agency?**

A subrecipient cannot use the State agency's approved indirect cost rate. Indirect costs vary by organization and program. If a subrecipient incurs overhead or indirect costs, it must have its own, unique indirect cost rate plan or justify use of the 10 percent de minimis rate.

**5.9. Can a State agency or subrecipient charge for building space as a direct cost on line '1' of the budget summary and use the 10 percent Federal de minimis rate for indirect costs (line 't' of the budget worksheet)?**

Building space cannot be included as both a direct cost and an indirect cost in a project budget. Normally, building space is not included in the indirect rate but if it is, the State agency or subrecipient cannot claim any additional costs for building space.

If the building is government owned, a project may charge the depreciation. If the building is privately owned, the project can charge prevailing rental rates at similar facilities.

**5.10. What are the indirect cost considerations for institutions of higher learning?**

Indirect costs at colleges and universities are limited to 26 percent of Modified Total Direct Costs (2 CFR 200, Appendix III.)

FNS will accept indirect cost rates for colleges and universities that are 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 outreach 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.

For outreach, the allowable activities are defined as those activities that provide program information about SNAP to low income people. Other activities, such as research and data analysis, are not the primary purpose of outreach and should not be used in determining where the majority of the activities take place.

### **5.11. Why would a subrecipient choose not to use an indirect cost rate?**

It is possible for a subrecipient to incur no indirect costs. For example, a subrecipient may be entirely dedicated to SNAP outreach and all costs are direct costs. Another example is a subrecipient whose indirect costs are so low and/or minimal (support staff spend minimal time on SNAP outreach or there are minimal building maintenance costs) that it does not want reimbursement because the cost of calculating indirect costs would be higher than the funding received.

### **5.12. In a project involving multiple subrecipients, does the lead subrecipient make the decision concerning the indirect cost rate for all subrecipients?**

Each subrecipient makes its own choice concerning the indirect rate it will use.

### **5.13. If one organization is in multiple outreach plans, should it use the same indirect cost rate for each project?**

If an organization has an approved indirect cost rate from its cognizant agency, it must use that rate in each State outreach plan. If the organization does not have an approved indirect cost rate, it may use different rates for each project following the guidelines above.

## **6. Record Retention and Disclosure Policy**

### **6.1. What are the applicable record retention policies?**

All records must 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 subrecipient 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 SNAP. (7 CFR 272.1(f))

### **6.2. What is the disclosure policy?**

Case file information on SNAP recipients, including names of recipients, social security numbers, and other sensitive information is considered confidential and may not be released. Disclosure of information obtained from recipients may be made only to persons directly connected with the administration of SNAP or to others provided that the program recipient signs a release form documenting their agreement to the specific release. Such an agreement shall not be a condition of receipt of benefits. (7 CFR 272.1(c); and Section 11(e)(8) of the Food and Nutrition Act of 2008, as amended.)

State agencies and their contractors must protect confidential and private information gained from clients during the outreach process. Appropriate physical and computer security policies should be in place to protect sensitive information.

## **7. Materials Development Policy**

### **7.1. What are the requirements for development of outreach materials?**

FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use, or authorize others to use videos, computer programs such as CD-ROMs and related source codes, literature, or other products produced, in whole or in part, with SNAP funds for government purposes (7 CFR 277.13(g)).

The **nondiscrimination statement** must be included on any printed publications or material and nonprint materials (including, but not limited to audio, video, websites, etc.) that explain USDA programs or program policy. Materials developed or reprinted with SNAP funds must include the nondiscrimination statement (7 CFR 272.5(b)(2)).

#### **Sample Text 1: Nondiscrimination Statement**

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

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

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

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

This institution is an equal opportunity provider.

When the full statement will not fit, the following short statement may be used in print no smaller than the text, with the approval of the FNS Regional Civil Rights Director: “This

institution is an equal opportunity provider.” For materials in Spanish: “Esta institución es un proveedor que ofrece igualdad de oportunidades.” Please check with your FNS Regional Civil Rights Director to ensure you have the current wording for both the full and short nondiscrimination statements.

**Credit** must be provided to the U.S. Department of Agriculture as a funding source on all materials.

### **Sample Text 2: Funding Credit Statement**

This project has been funded at least in part with Federal funds from the U.S. Department of Agriculture. The contents of this publication do not necessarily reflect the view or policies of the U.S. Department of Agriculture, nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government.

### **7.2. What are the requirements for materials that have limited space?**

FNS does not require a nondiscrimination or credit statement on materials with limited space where program requirements and policy are not addressed. Examples: business cards, pens and pencils, reinforcement materials with only the SNAP logo.

### **7.3. What are the requirements for use of the SNAP logo?**

The SNAP logo may be used by those administering SNAP, including the State agencies and their counterparts at the local and county levels, and by subrecipients for the purpose of SNAP outreach and public notification materials. Examples include brochures, letters, web sites, presentations, handouts, flyers and business cards. For more information on use of the SNAP logo, visit: <https://www.fns.usda.gov/using-snap-logo>.

### **7.4. When should materials be provided in languages other than English?**

In certain circumstances, outreach materials must be made available in languages other than English (7 CFR 272.4(b(2))). Low-income households that speak the same non-English language and do not contain adults fluent in English are defined as a single-language minority. In other words, they have limited English proficiency. State agencies are encouraged to provide materials in other languages to accommodate language barriers. At a minimum, State agencies must provide outreach materials in the appropriate languages if:

- The project area has less than 2,000 low-income households and approximately 100 or more of those households are of a single-language minority; or
- The project areas has 2,000 or more low-income households and approximately 5 percent or more of those households are of a single-language minority; or
- The project area’s certification offices provide services in an area in which there are approximately 100 single-language minority low-income households; or
- The project area’s certification offices provide services in an area of less than 100 low-income households and a majority of those households are a single-language minority.

## **8. Reporting Policy**

### **8.1. How should employees record their time?**

Time and effort reporting is required for all paid staff (full and part time) and volunteers supported by the outreach plan. Time records are used to calculate the charges, including salaries and benefits, for time spent on allowable activities. As a reminder, only public State or local entities can count volunteer time toward the project costs.

Do not submit completed time records with your outreach plan. Maintain completed time records for audit.

The administrative office that converts the time and efforts records into dollars charged must maintain accounting records that substantiate the charges. These costs must relate to the total accounting documentation maintained by the organization that is asserting the claim.

A semiannual time and effort certification by a supervisor is required for all employees working full time under the State outreach plan.

Employees working part-time under the State outreach plan must adhere to the following rules:

- Time records are required for all part-time outreach staff and volunteers. (See Section D for a sample format.)
- Time must be reported in hours, and not percentage, of time to the project.
- State agencies may develop their own forms. The form must include space to enter hours spent on outreach, date, and employee and supervisor signatures.
- If the entity has a Federally-approved Random Moments Time Study, it may be used in lieu of time records.
- If a university or college has an approved Plan Confirmation from the Department of Health and Human Services, it may be used in lieu of time records.
- If a university has a procedure for hourly documentation already in place, it may meet the reporting requirement, subject to FNS review and approval.
- Time and effort forms can be maintained at the work site and must be available for review/audit for a period of three years.
- State agencies may submit alternative methods of calculating time, including a justification, for review by the FNS Regional Office. The alternative method of calculating time must provide a reasonable assurance of accuracy in order to be considered for approval.

When calculating costs, the total cost, including 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 costs of outreach.

## SECTION C: OUTREACH PLAN TEMPLATE

### 1. Cover Page/Contact Information/Signatures

Multiple year plans: Complete Section 1 each year.

SNAP

Annual Plan for Outreach

State: Enter the name of your State

State Agency: Enter the name of your State agency

Fiscal Year: Enter the Federal fiscal year.

Primary Contacts: Complete the table with the name, title, phone and email address for those State agency personnel who should be contacted with questions about the outreach plan. Add additional rows if needed.

Name	Title	Phone	Email

Certified By:

(Signature of Authorized Person)

\_\_\_\_\_  
State Agency Director (or Commissioner)

\_\_\_\_\_  
Date

Certified By:

(Signature of Authorized Person)

\_\_\_\_\_  
State Agency Fiscal Reviewer

\_\_\_\_\_  
Date

## **2. Statement of Need**

Provide a concise description of the need for the projects. Include data such as trends in SNAP participation, and the incidence of hunger and food insecurity. Include the source and date of the data. Additional data such as demand for emergency food providers, poverty rates, unemployment rates, or other similar information may also be provided to support the need. (Suggested length: Not more than 2 pages)



### **3. Outreach Plan Summaries**

Executive Summary: Provide an overview of your outreach plan. Briefly describe your goals and expected results. Include the target audiences and the outreach strategies that will be implemented. Give a general description of your evaluation plan. (Suggested length: Not more than 1 page).

Summary of Projects: Complete the table to provide a summary of the projects/initiatives you will implement. Give each project/initiative a number and a title. Refer to each project/initiative by number and title throughout the rest of your outreach plan. Add more lines as needed. The first row of this table is completed to provide an example.

**Table 3: Outreach Plan Summary Example**

<b>Project Number</b>	<b>Title</b>	<b>Geographic Area</b>	<b>Target Audience</b>	<b>Contracted (list contractor) or In-House?</b>
1	Outreach Worker Train-the-Trainer	Boomtown	Food Pantry Volunteers; Health Center Case Managers; Parish Nurses	In-house

#### **4. Outreach Project Details**

**Project Table:** Complete this section for each project listed in the Summary of Projects Table in Section 3 above. Reminder: Copies of MOUs/contracts must be available upon request. (Suggested length: Not more than 2 pages for each project)

**Table 4: Outreach Project Details Instructions**

<b>Project Number</b>	List the project number as noted in the table in Section 3.			
<b>Goal</b>	List the goal of the project. The goal should be measurable (a numeric goal, if possible). Likely, the goal will focus on increasing SNAP participation. Indicate if the number of people is contacts, applicants, approved applicants, etc.			
<b>Target audience</b>				
<b>Timeline</b>	Start	Month and year, quarter, or annual/ongoing.	End	Month and year, quarter, or annual/ongoing.
<b>Description of Activity</b>	Provide a description of the activity and how it will be implemented.			
<b>Subrecipient</b>	If a subrecipient will be hired, list the name of the subrecipient. If there is no subrecipient, indicate so. Subrecipients may be community or faith-based organizations, local SNAP offices, food banks or pantries, retailers, or other community organizations. Obtaining a letter of commitment from your partners is good project management. It is suggested that you obtain such a letter from each partner and maintain the letter in your files.			
<b>Tax ID of Subrecipient</b>				
<b>Role of the Subrecipient</b>	Describe the role of the subrecipient. Add rows for additional subrecipients, if necessary.			
<b>Role of State agency</b>				
<b>State/subrecipient funding source</b>				
<b>Volunteers</b>	Are volunteers involved in this activity:      Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, in what capacity?			
<b>Evaluation</b>	Explain how the project will be evaluated. Include your data collection and analysis plan. Note if your evaluation will be able to assess how many people reached by the outreach activities were certified or denied for SNAP benefits.			

**5. Outreach Project Staffing Details**

Staffing Table: Use this table as a worksheet to calculate the staffing cost for each project. Add more lines to the table as needed. The total in column f should be placed in the personnel line item on the project budget detail table in Section 6 (column f, row g). The first row of this table is completed to provide an example.

Multiple year plans: Complete Section 5 each year.

**Table 5: Outreach Project Staffing Costs**

Project Number	List the project number as noted in the table in Section 3.						
Staff Person Title	Name of Staff Person	(a) FTE Outreach	(b) Salary	(c=a×b) Outreach Salary	(d) Benefits Rate	(e=c×d) Outreach Benefits	(f=c+e) Total
Outreach Worker	Smith	.5	\$25,000	\$12,500	20 %	\$2,500	\$15,000

## **6. Outreach Project Budget Details and Narrative**

**Budget Detail Table:** Complete the budget detail table for each project listed in the Summary Table in Section 3 above. The table rows and columns are labeled to help you calculate the budget. Enter the personnel costs from your staffing table in Section 5 in column f, row g below. If there are no contracts, leave row r blank.

**Budget Narrative/Justification:** Provide a budget narrative that justifies each cost and explains how the amount for each line was determined. Be sure to provide details for what is included in the line labeled “other” on the line item budget. (Suggested length: Not more than 2 pages each.)

Example: Local travel is calculated at 6 round trips from Capital City to Newtown to train outreach workers. Each trip is 120 miles round trip. ( $6 \times 120 = 720$  total miles). The total cost for local travel is  $720 \times \$0.565 = \$406.80$ . The mileage rate used is the 2017 rate established by the Internal Revenue Service of \$53.5 cents per mile for business miles driven.

Multiple year plans: Complete Section 6 each year. Approval of budgets is on an annual basis. Thus, approval of the upcoming fiscal year budget does not constitute approval of any future year budget presented in multi-year plans. Such budgets will continue to be approved annually.

**Table 6: Sample Budget Detail Table**

<b>Budget Detail Table for Project #:</b>						
<b>Expenses</b>	<b>(a) Public Cash</b>	<b>(b) Public In-kind</b>	<b>(c) Private Cash</b>	<b>(d=a+b+c) Total Non- Federal</b>	<b>(e) Federal Funds</b>	<b>(f=d+e) Total Funds</b>
(g) Personnel (Salary & Benefits)						
Other Direct Costs						
(h) Copying/Printing/Materials						
(i) Internet/Telephone						
(j) Equipment and Other Capital Expenditures						
(k) Supplies and Non Capital Expenditures						
(l) Building/Space						
(m) Other						
(n=h+i+j+k+l+m) Subtotal Other Direct Costs						
Travel						
(o) Long Distance						
(p) Local						
(q=o+p) Subtotal Travel						
(r) Contractual						
(s=g+n+q+r) Total Personnel, Direct Costs, Travel, and Contractual						
(t = indirect cost rate × s) Indirect Costs						
<b>(u=s+t) TOTAL</b>						

## **7. Budget Summary**

Line Item Budget: Complete the line item budget table below to present an overall line item budget for the entire outreach plan. Summarize the information presented in the budget detail tables for each project to complete this table. The table rows and columns are labeled to help you calculate the budget. If you have no contracts, leave row “r” blank.

Multiple year plans: Provide a budget summary for each year of the plan and for the plan as a whole. Complete Section 7 each year.
--

**Table 7: Line Item Budget Summary**

<b>Line Item Budget Summary for Project #:</b>						
<b>Expenses</b>	<b>(a) Public Cash</b>	<b>(b) Public In-kind</b>	<b>(c) Private Cash</b>	<b>(d=a+b+c) Total Non- Federal</b>	<b>(e) Federal Funds</b>	<b>(f=d+e) Total Funds</b>
(g) Personnel (Salary & Benefits)						
Other Direct Costs						
(h) Copying/Printing/Materials						
(i) Internet/Telephone						
(j) Equipment and Other Capital Expenditures						
(k) Supplies and Non Capital Expenditures						
(l) Building/Space						
(m) Other						
(n=h+i+j+k+l+m) Subtotal Other Direct Costs						
Travel						
(o) Long Distance						
(p) Local						
(q=o+p) Subtotal Travel						
(r) Contractual						
(s=g+n+q+r) Total Personnel, Direct Costs, Travel, and Contractual						
(t = indirect cost rate × s) Indirect Costs						
(u=s+t) TOTAL						

**8. Assurances**

<b>Check to Indicate You Have Read and Understand the Assurance Statement</b>	<b>Assurance Statement</b>
	The State agency is accountable for the content of the State outreach plan and will provide oversight of any subrecipients.
	The State agency is fiscally responsible for outreach activities funded under the plan and is liable for repayment of unallowable costs.
	Outreach activities are targeted to those potentially eligible for benefits.
	Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program.
	If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed.
	Documentation of State agency costs, payments, and donations for approved outreach activities are maintained by the State agency and available for USDA review and audit.
	Contracts are procured through competitive bid procedures governed by State procurement regulations.
	Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues.
	Program activities do not supplant existing outreach programs, and where operating in conjunction with existing programs, enhance and supplement them.
	Program activities are reasonable and necessary to accomplish outreach goals and objectives.

By signature on the cover page of this document, the State agency director (or Commissioner) and financial representative certify that the above assurances are met.



## **9. Attachments**

- FNS-366A (Budget Projection)
- Indirect Cost Rate Agreement of State agency
- Approved Indirect Cost Rate Agreement of Subrecipient(s)
- *Note: Add others as needed*

## SECTION D: FORMATS FOR REPORTS AND WAIVER REQUESTS

### **1. Final Report Format**

**Final Report:** This is a suggested format for the final report. The due date is December 31. Use the promising practices format (Section E) to report lessons learned from your project that you would like to share with others.

Multiple year plans: Complete and submit a final report each year.
--

**Accomplishments:** Describe the accomplishments and achievements of each of the outreach plan projects.

Example:

- SNAP hotline averaged 100 calls per month asking for general information.
- 90 percent of applications sent to local office were complete. No additional information or verification documents were required.
- Project staff averaged 30 pre-screenings per month, 20 initial applications and 10 recertification applications.

**Major Challenges and Solutions Developed:** Discuss issues that affected the implementation of the outreach plan/projects and outcome such as changes in: staffing, collaborative arrangements, etc. and how they were resolved.

**Evaluation Methodology and Findings:** Discuss the results of the project in comparison to the established goals. Also include the types of data/information collected, how collected, how analyzed, limitations and cautions on its use, interpretations and conclusions.

<Signature >

---

State SNAP Director

---

Date

**2. Promising Practices Report Format**

This is a suggested format to report promising practices and lessons learned via your State outreach plan to FNS. Please become part of our growing library of resources for others doing outreach.

Part I: Entrant’s (Employee) Information (Please Print or Type)

Employee Name (Last/First/MI)	Title
Employee Work Address State                      Zip Code	City
E-mail Address	Office Telephone Number

Part II: Promising Practice

City, State	Type of Outreach Practice:
Activity: Describe succinctly and in as much detail as possible.	

	Dates in Effect	
	From	To
Outcomes/Results: What were the lessons learned?		

Part III: Contact for Information about Promising Practice

Full Name	Title	Telephone		E-mail Address
		Phone	Fax	

### **3. Time and Effort Format**

This is a suggested format to record employee time spent on SNAP outreach. This is a tool for your use. Do not submit time records with your outreach plan. For time and effort reporting policy, see 8.1. How should employees record their time?.

Name:

Title/Position:

Location:

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	

23	
24	
25	
26	
27	
28	
29	
30	
31	
Month's Total:	

23	
24	
25	
26	
27	
28	
29	
30	
31	
Month's Total:	

23	
24	
25	
26	
27	
28	
29	
30	
31	
Month's Total:	

**Quarter Total:**

<Signature >

\_\_\_\_\_  
Employee

\_\_\_\_\_  
Date

<Signature >

\_\_\_\_\_  
Supervisor

\_\_\_\_\_  
Date

Adapted from Wyoming form, May 2003.

#### **4. Waiver Request Format**

Use of this format is required if the State agency requests an administrative waiver from FNS. Tips for writing a cash donation waiver request are included in the format below. The waiver request should be sent to the appropriate Regional Office for review and approval.

**1. Waiver serial number:** Enter the waiver number if one was previously assigned. Use the waiver serial number in all correspondence regarding the waiver. If no serial number has been assigned, leave blank.

**2. Type of request:** Enter the appropriate answer:

- Initial: The waiver is requested for the first time
- Extension: An extension of a previously approved is requested.
- Modification: A change to a previously approved waiver is requested.
- Reconsideration: A reexamination of a waiver denial is requested.

**3. Primary regulation citation:** Identify the specific section of 7 CFR for which the waiver is requested. Contact the Regional Office if you have any questions regarding the citation. For cash donation waivers the primary citation is: 7 CFR 277.4(c)(2).

**4. Secondary regulation citation:** Some proposals require a cross-reference to another section of the regulations. The secondary citation for private cash donation waivers is: 7 CFR 277.4(d) and 7 CFR 277.4(e).

**5. State:** Enter the name of your State.

**6. Region:** Enter the name of your FNS Region.

**7. Regulatory requirements:** Describe the nature of the regulatory requirement that is requested to be waived.

**8. Proposed alternative procedures:** Describe the procedures the State agency will follow in lieu of the regulatory requirement.

**9. Justification for request:** Explain the purpose of the waiver and how it meets the approval criteria of the regulations.

**10. Anticipated impact on households and State agency operations:** Describe the effect the waiver is expected to have on households in terms of quality or timeliness of service, any administrative or Program savings, and any adverse effect on households or the State agency if the waiver is not granted.

**11. Caseload information, including percent, characteristics, and quality control error rate for affected portion:** Provide information regarding the percent of the total caseload affected by the waiver, whether the households are prospectively or retrospectively budgeted, monthly reporters or change reporters, elderly or disabled, and other relevant information. Provide the latest quality control information available for the type of household affected. For example: "Pure SSI households constitute 15 percent of the caseload and have an error rate of 7 percent."

**12. Anticipated implementation date and time period:** Indicate the implementation date and length of time (dates) for which the waiver is requested.

**13. Proposed quality control review procedures:** Describe the effect the waiver is expected to have on quality control review procedures. If applicable, provide detailed review procedures to be used in lieu of procedures in the FNS Handbook 310.

**14. Signature and Date:** Type the name and title. Include signature and date stamp.



## SECTION E: RESOURCES

### 1. Glossary

**Applicant:** Persons/households who have applied for SNAP benefits.

**Application Assistance:** Provision of help to clients in completing SNAP application and gathering verification documents. Application assistance is usually provided by community-based outreach workers. It may include delivery of signed applications to the local office. Application assistance does not include interference with the SNAP interview. Application assistance provides support to the client during the application phase, which can lead to a more complete application, fewer trips to the local office, and easier processing for the eligibility worker.

**Billboard:** Outdoor, large format advertising display, either permanent or portable, which is used to advertise or inform along a roadway. Does not include large signs and banners intended for viewing predominantly by individuals not travelling along a roadway.

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

**Capital Equipment:** Non-expendable property having a value of \$5000 or more per item at the time of acquisition. Capital equipment must be inventoried and accounted for every two years by a physical inventory process. Capital equipment must be disposed of in accordance with Federal property management requirements.

**Civil Rights Instruction 113-1:** This instruction establishes and conveys policy and provides guidance and direction to the USDA Food and Nutrition Service and its recipients and customers, and ensure compliance with and enforcement of the prohibition against discrimination in all FNS nutrition programs and activities, whether federally funded in whole or not. Link to instruction: <https://www.fns.usda.gov/cr/Documents/113-1.pdf>

**Cognizant Federal Agency:** The Federal agency identified by OMB that is responsible for establishing indirect cost rates for a given organization.

**Contracted Activities:** State outreach plan activities that are implemented on behalf of the State by an outside organization with a formal contract in place with the State agency.

**Depreciation:** The process of allocating an appropriate portion of the cost of acquiring a building or a piece of equipment to each year the property is used in program operations. Depreciation cost measures the State agency's or subrecipient's "consumption" of its investment in the property. For example, consider a State agency that purchases a building for \$500,000; plans to use it for 15 years; and expects to sell it for \$25,000 at the end of that period. The State agency would compute its annual depreciation as follows:

- a. Compute the building's depreciable cost:
  - Acquisition cost of building: \$500,000
  - Less Building's scrap value: \$25,000
  - Land on which building stands: 100,000

- Non-depreciable items: (125,000)
  - Depreciable Cost: \$375,000
- b. Compute the building's annual depreciation cost:
- Depreciable Cost: \$375,000 (\$25,000 annually)
  - Years of Useful Life: 15

The State agency would include the \$25,000 of depreciation cost in its FNS 778 report to FNS and draw 50-percent of it from its Letter-of-Credit.

**Depreciation Schedule:** The documentation that supports the depreciation cost a State agency or subrecipient claims for SNAP reimbursement each fiscal year that it uses depreciable assets in SNAP operations. In the above example, the State agency's depreciation schedule would provide for annually charging \$25,000 of depreciation cost on the building. If the State agency made enhancements to the property that substantially increased the property's value and/or prolonged its useful life, these expenditures would add to the property's depreciable cost. That, in turn, would require conforming adjustments to the depreciation schedule.

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

**Grantee:** The agency of the State responsible for administering SNAP. Federal funds are paid to this agency for all food costs, and for up to 50 percent of all non-food expenditures, including program administration and outreach. The grantee in turn may make agreements with local agencies (subrecipients) to conduct outreach activities. Federal funds are made available to pay for half of all allowable outreach costs on a reimbursement basis.

**Indirect cost rate:** A rate typically computed by summing all indirect costs then dividing the total by the Modified Total Direct Costs. The resulting percentage is applied to each grant to determine their share of the indirect or overhead costs. Indirect cost rates applied in the outreach plan must be documented through an indirect cost plan that is approved by a cognizant agency.

**Lobbying:** 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.

**Non-Capital Equipment:** Property having a value of less than \$5000 per item at the time of acquisition. This equipment is generally treated as supplies and is not required to be included in any property management system. Treatment and disposition of non-expendable equipment should be done in accordance with State or local property management requirements.

**Non-Contracted Activities:** State outreach plan activities that are implemented directly by the State agency using State personnel.

**Non-Federal Public Agency:** 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:** A set of learning experiences designed to facilitate the voluntary adoption of eating, physical activity, and other nutrition-related behaviors conducive to health and well-being for those on a limited budget.

**Office of Management and Budget (OMB):** The Office of Management and Budget is part of the Executive Office and reports directly to the President of the United States. OMB assists the

President in overseeing the preparation of the Federal budget and in supervising its administration in Federal agencies. The OMB also oversees and coordinates the Administration's procurement, financial management, information, and regulatory policies.

**Outreach:** Educational and informational efforts that provide factual information about the nutritional and other benefits of participating in SNAP, as well as basic information about how to apply, directed to nonparticipating but potentially eligible persons. Also referred to as “program informational activities.” These program informational activities accomplish the following: 1) inform low-income households about the availability, eligibility requirements, and application procedures, 2) provide information about the nutritional benefits of SNAP, 3) correct myths and misperceptions about SNAP, and 4) allow individuals to make a well-informed decision about whether or not to apply based on accurate information. Allowable outreach activities do not include recruitment activities. See the definition of “recruitment activities” for more information.

**Outreach Plan:** An official written document that describes outreach activities to be delivered. It should describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

**Plan Confirmation:** 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, U.S. Department of Health and Human Services, and have had an audit completed that supports the use of Plan Confirmation. Universities that 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.

**Pre-Screening:** The process by which potentially eligible people are asked basic eligibility questions (not the complete application) in order to estimate potential eligibility for SNAP. Sometimes, pre-screening also includes an estimate of the amount of benefits they could receive. Pre-screening is a way to educate low income people who don't know they could be eligible for benefits. Pre-screening may be done on a computer or on paper.

**Program Informational Activities:** Activities to inform low-income households about the availability, eligibility requirements, application procedures and the benefits of SNAP. Program Informational Activities are also known as outreach.

**Random Moment Time Studies:** 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.

**Recruitment Activities:** Recruitment activities are those designed to persuade an individual to apply for SNAP benefits through the use of persuasive practices. Persuasive practices constitute coercing or pressuring an individual to apply, or providing incentives to fill out an application. Recruitment activities are unallowable costs.

**Single Language Minority:** A group of low-income households that speak the same non-English language and do not contain adults fluent in English.

**SNAP Eligibles:** Persons who meet criteria for participation in SNAP as described in Federal legislation and regulations.

**State Agency:** The agency of State government, including its local offices, which is responsible for the administration of the Federal public assistance programs within the State.

**Subrecipient:** The organization or person to which a State agency, as grantee, takes an agreement to conduct outreach activities. Federal funds reimburse the State agency for up to half of its allowable administrative costs, including outreach. The grantee in turn generally will reimburse subrecipients for up to half of their allowable costs. The subrecipient 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.

**Taxpayer Identification Number (TIN):** An identification number used by the Internal Revenue Service (IRS) in the administration of tax laws. It is issued either by the Social Security Administration (SSA) or by the IRS. A Social Security number is issued by the SSA whereas all other TINs are issued by the IRS.

**Temporary Assistance for Needy Families (TANF):** TANF is a block grant program to help move recipients into work and turn welfare into a program of temporary assistance. These funds cover benefits and services targeted to needy families.

## 2. SNAP Web Resources

**Table 8: SNAP Web Resources**

<b>Topic</b>	<b>Description</b>	<b>Address</b>
Main SNAP Web Page	General information about SNAP.	<a href="https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap">https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap</a>
FNS Partnerships	Information on how to partner with FNS programs.	<a href="https://www.fns.usda.gov/get-involved/partnerships">https://www.fns.usda.gov/get-involved/partnerships</a>
Main SNAP Outreach Web Page	Information about SNAP outreach.	<a href="https://www.fns.usda.gov/snap/outreach">https://www.fns.usda.gov/snap/outreach</a>
FNS Pre-screening Tool (Step 1)	Simple, low literacy online pre-screening tool enables users to input information privately and find out if they might be eligible for SNAP benefits and how much they might receive.	<a href="https://www.snap-step1.usda.gov/fns/">https://www.snap-step1.usda.gov/fns/</a>
SNAP Participation Data	Features data and studies about participation in SNAP and the characteristics of households receiving SNAP benefits. Also includes evaluation reports for past FNS outreach grant programs.	<a href="https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap">https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap</a>
Economic Impact of SNAP Benefits	Links to studies about the economic benefits of SNAP. Includes research conducted for USDA's Economic Research Service (ERS), which is USDA's main source of economic information and research.	<a href="https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages">https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages</a>
United States Census Bureau	Data on income and poverty levels, including data by county and State.	<a href="https://www.census.gov/">https://www.census.gov/</a>