

**SUBJECT:** Food Stamp Outreach Plan Activities

**TO:** Food Stamps Program Directors  
All Regions

**Purpose of memorandum:**

This memorandum addresses questions recently raised about the allowable scope of formal State Food Stamp Program (FSP) outreach plans. The specific issue is whether State FSP outreach plans may include activities directed to access and retention of current participants *in addition to* outreach and education efforts directed to nonparticipating persons. This memorandum is intended to clarify that States may include access activities as well as outreach activities in their State outreach plans at their option. In the past, most if not all State outreach plans covered only those activities that were purely outreach and education. However, since both outreach and access are intended to reach the same goal of participation increase, there is no particular utility in limiting State outreach plans to outreach.

**Definition of Outreach:**

Outreach activities are defined as discretionary educational and informational efforts promoting the nutrition and other benefits of participating in the program which are directed to nonparticipating but potentially eligible persons.

**Definition of Access:**

Access activities are considered to be those discretionary activities that help current participants maintain and continue their participation, and include pre-certification efforts, but fall short of activities that are essentially certification. Access activities might include projects intended to increase retention rates of participants; support a client-friendly environment; simplify applications or the application process; educate persons who are losing TANF benefits about their possible continued eligibility for the FSP or deal with other issues of access improvement for clients. Certification is an essential and thus a nondiscretionary activity that generally is performed as a routine administrative function of the FSP local agency, with certain conditions and with certain waivers, under contract with other entities.

**Unallowable outreach and access costs:**

Unallowable costs are enumerated in Outreach Guidance and include efforts to promote enrollment of potentially eligible people who have made it clear that they do not wish to participate; serving as an authorized representative for an applicant or participant; transportation, or recruitment activities. Recruitment activities are defined in

Food Stamp Program (FSP) regulations at 277.4(b) as “activities designed to persuade an individual who has made an informed choice not to apply for food stamps to change his or her decision and apply.”

**State discretion:**

The decisions as to whether to conduct outreach or access activities or a blend of them, and then, consequently, whether to include such activities in a formal outreach plan, rest with the State agency. State agencies have full discretion in determining which, if any, local service entities they will contract with to provide outreach and access activities for which they will claim FSP reimbursement, considering all the attendant cost and administrative issues raised, such as securing non-Federal sources of funding for the State’s 50 percent share of the costs, oversight, financial integrity, and competing State priorities. This is an issue between the State and the local entity and would need to be formalized in a manner as specified by the State agency such as through a State contract or agreement.

**Formal State outreach plans are encouraged:**

Formal State outreach plans are not required but Food and Nutrition Service encourages them because they serve an important purpose of leveraging local support, involvement and commitment in an organized, formal public manner. However, State agencies not able to have such formal plans are still encouraged to undertake discretionary outreach and access improvement activities as important administrative functions of the FSP.

**Food Stamp Program reimbursement:**

It is important to note that reimbursement for access and outreach activities is not dependent upon having access and outreach activities outlined in an approved State outreach plan. Reimbursement is solely dependent upon the expenditures being allowable as well as reasonable and necessary administrative costs consistent with State agencies’ overall FSP State plans.

We hope this memorandum has clarified what may be included in a State’s outreach plan as well as other related issues.

Jessica Shahin  
Associate Deputy Administrator  
Food Stamp Program