USDA Food and Nutrition Service
U.S. DEPARTMENT OF AGRICULTURE

FY 2025
Supplemental Nutrition Assistance Program Education (SNAP-Ed) Plan Guidance

Nutrition Education and Obesity Prevention Grant Program

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Section 1: Introduction to the SNAP-Ed Plan Guidance

This *Fiscal Year (FY) 2025 Supplemental Nutrition Assistance Program Nutrition Education (SNAP-Ed) Plan Guidance* provides instructions for designing, operating, and reporting on all State nutrition education and obesity prevention grant program operations. It describes the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) expectations for State SNAP-Ed requirements and includes examples of *activities* that can be used in SNAP-Ed programming. Instructions are provided for preparing and submitting the annual *SNAP-Ed Plan* and *Annual Report.* Some sections have been broadened to provide additional instructions, and in some sections, new information has been added for greater clarity. SNAP-Ed is overseen by the SNAP Nutrition Education Branch within FNS and supported through Regional Offices.

New: FNS reorganized and made revisions to the following sections in the *FY 2025 SNAP-Ed Plan Guidance*:

- Section 1: Introduction to the SNAP-Ed Plan Guidance provides an overview of the guidance content, a list of revisions, and format changes.
- Section 2: Introduction to SNAP-Ed includes an overview of the SNAP-Ed program, and provides information on the goal, focus, and guiding principles of SNAP-Ed.
- Section 3: Requirements for SNAP-Ed Plans and Reports describes the Federal regulations, policies and guidelines, Federal allocation process, and program and financial reporting requirements.
- Section 4: Writing Your SNAP-Ed Plan and Annual Report contains detailed instructions and resources to facilitate *needs assessment* data collection and analysis during the planning process. Information on SNAP-Ed Evaluation Framework Indicators and *social marketing* reporting is included to facilitate consistent and streamlined reporting.
- Section 5: Appendices, includes all eight appendices. Notably, Appendix A: Reorganization of Guidance Contents provides a crosswalk of content from the *FY 2024 SNAP-Ed Plan Guidance* to its location in the *FY 2025 SNAP-Ed Plan Guidance*. An updated list of abbreviations and acronyms used in this document can be found in Appendix B: Abbreviations and Acronyms.

End of new material.

The *FY 2025 SNAP-Ed Plan Guidance* supersedes previous releases and provides instructions to States to implement all provisions of Section 4019 of the Agriculture Improvement Act of 2018.

1.1. SNAP-Ed Guidance Key and New Items

Sections with new content or significant revisions are marked with text reading **New**, with the end of the new section marked **End of new material**, to better identify this information. SNAP did not flag minor edits to the guidance, such as standardization,

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formatting, and grammar. Activities that represent State requirements or FNS expectations or are significant to program implementation are set in **blue, bold font** to facilitate identification. References to sections within the Guidance or external references will be linked and underlined. Key terms are *italicized in blue font*. Quotations referenced throughout will use quotation marks and be set in light blue font.

New: FNS continues to support enhancement of SNAP-Ed services by providing improvements and clarifications in the SNAP-Ed Plan Guidance. For *FY* 2025, FNS made revisions to the following:

- SNAP-Ed Plan Guidance contents (p. 5, Appendix A)
- SNAP-Ed Plan modules update (p. 23, p. 25)
- MyPlate update (p. 29)
- Other Federal agency updates (p. 30, p. 49)
- FNS Toolkits (p. 39, p. 124)
- Nutrition education reinforcement items (NERI) (p. 65, p. 72)
- Participant compensation (p. 67, p. 72)
- Unallowable costs (p. 69, p. 72)
- Gardening costs (p. 70)
- SNAP-Ed Connection update (p. 79, p. 150, p. 150, p. 151)
- USDA and SNAP logo permissions (p. 79, p. 79)
- Civil Rights updates (p. 80, p. 83, p. 121)
- Plan amendments clarification (p. 91)
- Income eligibility documentation (p. 97)
- Mapping tools update (p. 99)
- Community Eligibility Provision (CEP) update (p. 99)
- SNAP-Ed Toolkit update (p. 109, p. 151)
- Reporting requirements (p. 115, p. 121, p. 124)
- SNAP-Ed Plan Checklist update (p. 139, p. 140)
- Management Evaluation Guide (p. 166)
- New or updated key terms in Appendix F:
    - *Adopted* (p. 152)
    - *Annual Report* (p. 152)
    - *Applicant* (p. 152)
    - *Census Tracts* (p. 152)
    - *Maintained* (p. 155)
    - *Participant Support Costs* (p. 157)
    - *People with low income* (p. 157)
    - *Priority Population* (p. 157)
    - *Project* (p. 158)
    - *Research-Based Evidence* (p. 158)
    - *SNAP-Ed Approaches* (p. 159)
    - *SNAP-Ed Target Audience* (p. 159)
    - *SNAP-Ed Toolkit* (p. 159)

End of new material

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Section 2: Introduction to SNAP-Ed

SNAP is the Nation's first line of defense against hunger and a powerful tool to improve nutrition among *people with low income*. A USDA study found that participating in SNAP for 6 months is associated with a significant decrease in food insecurity.[1] An additional USDA study found SNAP participants typically spend less on average on food than eligible nonparticipants and spend more of their food dollars on foods prepared at home.[2] Further studies indicate that overall, no major differences are apparent between the types of foods purchased by SNAP-participating households and nonparticipating households.[3]

SNAP-Ed strengthens SNAP's public health impact by addressing food and *nutrition security* to improve nutrition and prevent or reduce diet-related chronic diseases, including obesity, among SNAP recipients. **USDA defines food security as access at all times to enough food for an active, healthy life.** An active, healthy life depends on both adequate amounts of food and the proper mix of nutrient-rich food to meet an individual's nutrition and health needs.[4] *Nutrition security* means all Americans have consistent and equitable access to healthy, safe, affordable foods essential to optimal health and well-being.[5]

SNAP-Ed agencies should emphasize the importance of programming that addresses both food and *nutrition security* and should adopt all approaches they use to deliver evidence-based nutrition education and obesity prevention activities with an equity lens. To the extent possible, these approaches should address the coexistence of food insecurity and diet-related chronic diseases, prioritize comprehensive multilevel and/or *public health approaches* with the potential to reach historically underserved populations, and translate the latest science into culturally and contextually relevant actions that communities can integrate into their daily lives. Selected examples include:

- SNAP-Ed has been used to establish multisector partnerships to help ensure readily available fresh produce and nutrition education for families with limited access. In one State, SNAP-Ed brought together a health insurance provider, local health centers, churches, *food banks* and food pantries, and a local library to establish a mobile market. The market distributed fresh produce to eligible families at convenient locations to improve access to healthy foods. SNAP-Ed staff also provided recipes and nutrition education at the mobile market events

[1] Mabli, J., Ohls, J., Dragoset, L., Castner, L., & Santos, B. (2013, August). *Measuring the effect of Supplemental Nutrition Assistance Program (SNAP) participation on food security*. Mathematica Policy Research Report for U.S. Department of Agriculture, Food and Nutrition Service.
[2] Tiehen, L., Newman, C., & Kirlin, J.A. (2017, August). *The food-spending patterns of households participating in the Supplemental Nutrition Assistance Program: Findings from USDA's FoodAPS* (Economic Information Bulletin No. 176). U.S. Department of Agriculture, Economic Research Service.
[3] Garasky, S., Mbwana, K., Romualdo, A., Tenaglio, A., & Roy, M. (2016, November). *Foods typically purchased by SNAP households*. IMPAQ International for U.S. Department of Agriculture, Food and Nutrition Service.
[4] The United States Department of Agriculture Economic Research Service. (2022, October). *Definitions of food security*. https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/definitions-of-food-security/
[5] The United States Department of Agriculture Food and Nutrition Service. (2022, March). *USDA actions on nutrition security.* https://www.usda.gov/sites/default/files/documents/usda-actions-nutrition-security.pdf

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and translated materials to help meet the unique language needs of the limited English-proficient community.

- In several States, SNAP-Ed helps promote SNAP match programs, which provide SNAP recipients with supplemental benefits to buy produce at SNAP-accepting farmers markets and grocery stores. These collaborations make fruits and vegetables more affordable for SNAP recipients and have the potential to increase access to, and consumption of, healthy foods in remote and rural communities. SNAP-Ed may be used to coordinate *social marketing* campaigns, conduct onsite food demonstrations, and promote farmers markets and grocery stores with match programs to SNAP recipients.
- Many SNAP-Ed programs use *public health approaches*, such as *social marketing* strategies, to promote healthy foods and beverages. One State partnered with *SNAP-Ed-eligible* communities to implement a multichannel *social marketing* campaign that encourages healthy nutrition and physical activity behavior change. The campaign materials were developed based on focus group feedback to ensure the messages and images resonated with community members and were placed in prominent public locations. The State used many communication channels—including texts, message boards, banners, and posters—to disseminate short, simple statements on consuming more produce and less sugary drinks and being more active. These clear and consistent healthy messages were displayed over 20 million times throughout the campaign and resulted in the majority of survey respondents able to recall campaign images.

More information on these and other examples can be found on the SNAP-Ed Connection website.

SNAP-Ed remains a priority for FNS, and the Agency appreciates the leadership demonstrated by States toward this mutual commitment to improve the health of families with low incomes. The SNAP-Ed requirements mandated by the Food and Nutrition Act under Section 28 complement and address the FNS mission and the goal and focus of SNAP-Ed. As part of the FNS mission, "We work with partners to provide food and nutrition education to people in need in a way that inspires public confidence and supports American agriculture."

2.1. SNAP-Ed Goal

The SNAP-Ed goal is:

> "To improve the likelihood that persons eligible for SNAP [or other people with low income] will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current Dietary Guidelines for Americans (DGA) and the USDA food guidance."

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2.2. SNAP-Ed Focus

The focus of SNAP-Ed is—

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

SNAP-Ed-eligible is a label that refers to the *SNAP-Ed target audience*, specifically SNAP participants and other *people with low income* who qualify to receive SNAP benefits or other *means-tested Federal assistance programs*, such as Medicaid or Temporary Assistance for Needy Families. It also includes individuals residing in communities with a significant (50 percent or greater) population with low income.

2.3. SNAP-Ed Guiding Principles

The SNAP-Ed Guiding Principles characterize FNS's vision of comprehensive multilevel and *public health approaches* complementing high-quality nutrition education to address the nutrition concerns and food budget constraints faced by the *SNAP-Ed-eligible* audience. These Guiding Principles reflect the definitions of *nutrition education and obesity prevention services* and evidence-based *interventions* that stem from the Food and Nutrition Act (FNA).

FNS strongly encourages States to use these Guiding Principles as the basis for SNAP-Ed activities in conjunction with the SNAP-Ed goal and behavioral outcomes.

2.3.1. The Six SNAP-Ed Guiding Principles

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

Refer to Section 3.1. Summary of Regulations and Background.

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2. SNAP-Ed must include *nutrition education and obesity prevention services* consisting of a combination of educational approaches. The *Social-Ecological Model (SEM)* (figure 1) illustrates how all sectors of society—including individuals and families, communities, and organizations; small and large businesses; and policymakers—combine to shape an individual's food and physical activity choices.

   The *SEM* addresses how SNAP *nutrition education and obesity prevention services* can be provided to the *SNAP-Ed-eligible* audience through the three *SNAP-Ed Approaches* described in the FNA (see text box to the right and Section 3.3.2 SNAP-Ed Approaches).

   SNAP-Ed Approach One

   Individual or group-based direct nutrition education, health promotion, and *intervention strategies*

   SNAP-Ed Approach Two

   Comprehensive, *multilevel interventions* at multiple complementary organizational and institutional levels

   SNAP-Ed Approach Three

   Community and *public health approaches* to improve nutrition

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

   Refer to Chapter 4 of the DGA for more information about how nutrition education and obesity prevention activities can support healthy eating among adults.

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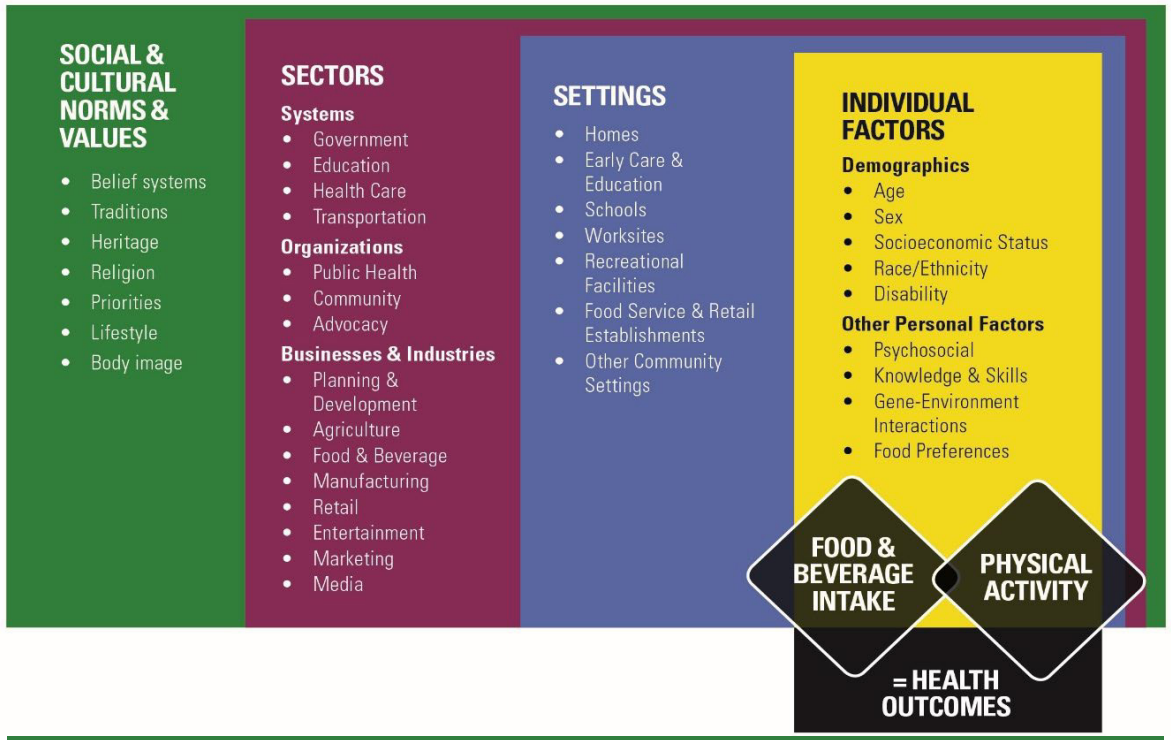
Figure 1. A Social-Ecological Model for Food and Physical Activity Decision

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



Sources: Adapted from (1) Division of Nutrition, Physical Activity, and Obesity. *Addressing obesity disparities: Social ecological model.* U.S. Department of Health & Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion; (2) Institute of Medicine. (2005). *Preventing childhood obesity: Health in balance.* National Academies Press, p. 85; (3) Story, M., Kaphingst, K. M., Robinson-O'Brien, R., & Glanz, K. (2008). Creating healthy food and eating environments: Policy and environmental approaches. *Annual Review of Public Health,* 29, 253–272. https://doi.org/10.1146/annurev.publhealth.29.020907.090926

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3. SNAP-Ed services have the potential to impact behaviors related to the nutrition and physical activity of the overall *SNAP-Ed-eligible* audience. Based on a needs assessment, States have the flexibility to determine priority audience segments that would be best served by SNAP-Ed.

   Refer to Section 4.3. Guidelines for Developing the SNAP-Ed Plan.

4. SNAP-Ed must use evidence-based, *behaviorally focused interventions* that maximize national impact by concentrating on the program's key behavioral outcomes.

5. SNAP-Ed can enhance its reach when coordination and collaboration take place among a variety of interested parties at the local, State, regional, and national levels through publicly or privately funded nutrition *intervention*, health promotion, or obesity prevention *strategies*. The likelihood of nutrition education and obesity prevention *interventions* successfully changing behaviors is increased when consistent and repeated messages are delivered through multiple channels.

   Refer to Section 3.4. Requirements for Coordination and Collaboration.

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

   Refer to Section 3.1.3. Roles and Responsibilities.

An *evidence-based approach* for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available *practice-based evidence*. The SNAP-Ed key behavioral outcomes align with the DGA key recommendations. States may address other behavioral outcomes consistent with the goal and focus of SNAP-Ed and DGA messages. The primary emphasis of these efforts should remain on assisting the SNAP-Ed target population to establish healthy eating patterns and physically active lifestyles to promote health and prevent disease, including obesity. **States must consider the financial constraints of the SNAP-Ed target population in their efforts as required under the FNA.**

2.4. SNAP-Ed Approaches

The SNAP: Nutrition Education and Obesity Prevention Grant Program Final Rule (the Final Rule) stipulates that SNAP-Ed activities must include evidenced-based activities using two or more of these *SNAP-Ed Approaches*.

- **SNAP-Ed Approach One:** individual or group-based direct nutrition education, health promotion, and intervention *strategies*.
- **SNAP-Ed Approach Two:** comprehensive *multilevel interventions* at complementary organizations and institutional levels.
- **SNAP-Ed Approach Three:** community and *public health approaches* to improve nutrition and obesity prevention.

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Further details and examples of each *SNAP-Ed Approach* can be found in Section 3.3.2. SNAP-Ed Approaches. Information and expectations regarding evidence-based approaches can be found in Section 3.3.5. Evidence-Based Approach to SNAP-Ed.

2.5. Coordination and Collaboration Requirements

In conformance with the FNA, States may coordinate their SNAP-Ed *activities* with other publicly or privately funded health promotion or nutrition improvement *strategies*. For more detail, see Section 3.4. Requirements for Coordination and Collaboration.

Considering that SNAP-Ed funds are capped, States may be able to leverage SNAP-Ed financial resources with funding from other organizations with complementary missions to reach *SNAP-Ed-eligible* individuals through multiple channels and varied approaches to increase *effectiveness* and efficiency.

2.6. SNAP-Ed Roles and Responsibilities

Four main groups carry roles and responsibilities with SNAP-Ed. The role of each group is introduced in the following list, and further details and responsibilities can be found in Section 3.1.3. Roles and Responsibilities.

- **FNS** establishes SNAP-Ed policy and develops related guidelines and procedures, reviews and approves State *SNAP-Ed Plans*, monitors State SNAP-Ed projects, and provides technical assistance to program providers at all levels.
- **SNAP State agencies** develop a coordinated, cohesive State *SNAP-Ed Plan* based on a State-specific *needs assessment*. They provide leadership, direction, and information to *implementing agencies* and entities contracted to provide SNAP-Ed services to ensure that SNAP-Ed appropriately serves the SNAP-Ed audience and is consistent with SNAP-Ed policies.
- **SNAP-Ed implementing agency/local providers** work with the SNAP *State agency*, other FNS programs, and other SNAP-Ed providers within the State to develop a single comprehensive State *SNAP-Ed Plan*. They implement evidence-based nutrition education and obesity prevention efforts as specified in the approved State *SNAP-Ed Plan*.
- **Local SNAP Offices** inform SNAP participants and *applicants* of opportunities to participate in SNAP services, including SNAP-Ed.

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Section 3: SNAP-Ed Requirements and Program Details

3.1. Summary of Regulations and Background

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

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

- SNAP *State agencies*, in consultation with local operators of other Federal and State programs, must present a valid and data-driven *needs assessment* of nutrition, physical activity, and obesity prevention needs of the target population and their barriers to accessing healthy foods and physical activity in the State *SNAP-Ed Plan*. This helps to ensure SNAP-Ed *activities* complement the nutrition education and obesity prevention efforts of these programs.
- Under this rule, States must implement two or more of the following complementary *SNAP-Ed Approaches* to deliver evidence-based nutrition education and obesity prevention *activities* that are based on the most current DGA:
  - Individual or group-based nutrition education, health promotion, and intervention strategies
  - Comprehensive, *multilevel interventions*
  - Community and *public health approaches*
- The *SNAP-Ed-eligible* audience for SNAP-Ed is defined as SNAP participants and *people with low income* eligible to receive SNAP benefits or other *means-tested Federal assistance programs*, such as Medicaid or Temporary Assistance for Needy Families (TANF) and individuals residing in communities with a significant population with low income.

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

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

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

- Implement *Policy, systems, and environmental (PSE)* change approaches*, such as multilevel interventions* and community and *public health approaches* in addition to individual or group-based (direct) nutrition education, to deliver effective, evidence-based nutrition education and obesity prevention programming. **FNS encourages PSE changes that enhance the sustainability and effectiveness of SNAP-Ed activities in communities.**
- Coordinate with and complement *nutrition education and obesity prevention services* delivered in other USDA nutrition and education programs and other Federal nutrition and nutrition education programs. Programs for partnership include the *Expanded Food and Nutrition Education Program (EFNEP), the Food Distribution Program on Indian Reservations (FDPIR), the Commodity Supplemental Food Program (CSFP)*, and the National School Lunch Program (NSLP).
- Partner with other national, State, and local initiatives to further the reach and impact of SNAP-Ed *activities*. Developing and enhancing partnerships is critical to instituting *multilevel interventions* and *public health approaches* in communities.
- Monitor and evaluate SNAP-Ed *interventions* individually and together using appropriate evaluation indicators across *SEM*, such as those identified in FNS's SNAP-Ed Evaluation Framework.
- FNS requires *State agencies* to consult with Tribes about the SNAP State Plan of Operations, which includes the State *SNAP-Ed Plan*. State agencies must actively engage in timely, meaningful, and substantive dialogue with Tribal leadership or their designees, as required by SNAP regulations at 7 CFR §272.2(b), §272.2(e)(7), and 7 CFR §281.2(b). *State agencies* must include and consider the needs of American Indian/Alaskan Native (AI/AN) populations in conducting a holistic *needs assessment* for SNAP-Ed and coordinate with State and local operators on how those *needs assessments* can be conducted.[6] For more detail on this requirement, refer to Section 3.4.1.e. Tribal Organizations. For more detail on how agencies should document these activities in the *SNAP-Ed Plan* and *Annual Report*, refer to Section 4.3.5.c. Tribes and Tribal Organizations (Plan Module 5, Page 3) and Section 4.4.5.c. Tribes and Tribal Organizations (Report Module 5, Page 3).

The full text of the regulations and resources listed in this section can be found as follows:

- Food and Nutrition Act of 2008, as amended
- Agriculture Improvement Act of 2018, Section 4019

[6] Food and Nutrition Service. (2022, September). *Memorandum on Tribal Consultation Requirements.* U.S. Department of Agriculture https://www.fns.usda.gov/snap/memorandum-on-tribal-consultation-requirements

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- HHFKA of 2010
- SNAP: Nutrition Education and Obesity Prevention Grant Program Final Rule
- SNAP Promotion Final Rule
- 2020–2025 DGA

3.1.1. Determining SNAP-Ed State Allocations

The method for determining State SNAP-Ed allocations is based on State shares of SNAP-Ed expenditures in addition to State shares of SNAP participation. For *FY* 2018 and each year thereafter, the ratio of expenditures to participation is a 50/50 weighting of expenditures to participation. Estimated *FY* 2025 allocations to assist States in preparing their *FY* 2025 Plan budgets will be posted on the SNAP-Ed Connection website's Funding Allocations page, when available.

3.1.2. SNAP Promotion Rule and SNAP-Ed

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

For SNAP-Ed, this means information encouraging SNAP enrollment should not be placed on any billboard, radio, television, or video recording that may be part of a SNAP-Ed *intervention*. Communicating factual information pertaining to SNAP is not considered a recruitment activity. The purpose of SNAP-Ed documents should not be for *SNAP Outreach*; however, basic SNAP information or a link to SNAP information may be placed on handouts, brochures, recipes, etc. FNS encourages SNAP-Ed agencies to refer participants to *SNAP Outreach* partners and/or to SNAP State and local offices for SNAP benefit information and assistance.

3.1.3. Roles and Responsibilities

3.1.3.a. FNS

- Establishes SNAP-Ed policy and develops related guidelines and procedures, *intervention* programs, and *activities* that address the highest priority nutrition problems and needs of *SNAP-Ed-eligible* audiences.
- Allocates to SNAP *State agencies* 100 percent funding for allowable, reasonable, and necessary SNAP-Ed costs
- Reviews and approves State *SNAP-Ed Plans*
- Monitors State SNAP-Ed *projects*
- Leads the coordination of nutrition education and obesity prevention efforts at the national and regional levels, including partnerships with other Federal agencies, appropriate national organizations, and other public and private entities to address national priorities

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- Promotes and supports collaboration across programs and planning at State and local levels to ensure implementation of consistent and effective *interventions*
- Consults with the Director of CDC and outside experts and stakeholders
- Aligns SNAP-Ed messages with all other FNS nutrition assistance program messages
- Provides technical assistance to program providers at all levels, including linking staff with appropriate resources and identifying partnership opportunities at the State and regional levels
- Develops and provides nutrition education and *PSE* materials for use with the *SNAP-Ed-eligible* audience
- Oversees the collection and analysis of national SNAP-Ed data
- Incorporates the current DGA and the related USDA Food Guidance System in FNS nutrition assistance programs
- Promotes evidence-based decisions through technical assistance, standards for research, and support for sound and systematic evaluation

3.1.3.b. SNAP State agency

- Works collaboratively across State government agencies, especially those administering other FNS programs and with other appropriate agencies to promote healthy eating and active living among the *SNAP-Ed-eligible* population
- Develops a coordinated, cohesive State SNAP-Ed Plan based on a State-specific needs assessment of diet-related disease and addresses national and State priorities
- Provides leadership, direction, and information to *implementing agencies* and entities contracted to provide SNAP-Ed services to ensure that SNAP-Ed appropriately serves the SNAP-Ed audience and is consistent with SNAP-Ed policies
  - FNS encourages *State agencies* to participate in observations of nutrition education *activities* to ensure *activities* are delivered in accordance with the SNAP-Ed Guidance and efforts are appropriate for *SNAP-Ed-eligible* audiences. It is recommended that observations be conducted annually. The observation of nutrition education *activities* may be completed as part of the State *Management Evaluation (ME)* process
- Submits a unified State *SNAP-Ed Plan* to FNS and provides assurances that Plan *activities* comply with SNAP-Ed policies
- Submits a coordinated, cohesive annual SNAP-Ed *Annual Report* to FNS each year

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- Monitors implementation of the State's approved SNAP-Ed Plan, including allowable expenditures**.** SNAP *State agencies* must monitor performance of *implementing agencies,* which, at a minimum, includes a review of financial integrity to ensure—
  - Proper documentation and identification of costs
  - Proper allocation of costs
  - Accounting for any program income
  - Appropriate time and effort documents are kept

  State agencies may conduct their review of financial integrity as part of the State *ME* process.
- Offers training and/or information to State/local human services office staff or SNAP case workers so they can notify SNAP participants and *applicants* of the availability of SNAP-Ed programs and services, as applicable
- Provides budget information to FNS as required
- Collects and reports data regarding participation in SNAP-Ed and characteristics of those served

3.1.3.c. SNAP-Ed implementing agency/local provider

- Works with the SNAP *State agency*, other FNS programs, and other SNAP-Ed providers within the State to develop a single comprehensive State *SNAP-Ed Plan*. The Plan addresses State-specific SNAP-Ed population needs as well as national/State priorities and includes sound evaluation *strategies*
- Works with other State and local agencies and with private agencies to promote healthy eating and active living among the SNAP-Ed population
- Coordinates and collaborates with other State and local nutrition education and obesity prevention programs, especially those recognized by or receiving support from CDC
- Implements evidence-based nutrition education and obesity prevention efforts as specified in the approved State *SNAP-Ed Plan*
- Helps the SNAP-Ed audience understand how to eat a healthy diet on a limited food budget using SNAP benefits and managing their food resources
- Uses appropriate evidence-based *PSE strategies* and *interventions* to reach the SNAP-Ed population
- Collects and reports data to the SNAP *State agency* regarding participation in SNAP-Ed and characteristics of those served
- Submits required reports according to timelines established by the SNAP *State agency*

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- Works with the SNAP *State agency* to provide information to State/local office human services staff so they can notify SNAP participants and *applicants* of the availability of SNAP-Ed programs and services
- Builds relationships with other local service providers (Special Supplemental Nutrition Program for Women, Infants and Children [WIC]), local health departments, child care, school meals programs, etc.), so referrals of SNAP participants to other nutrition and health-related services can be made as appropriate
- Provides referrals to SNAP for individuals to access SNAP benefits, as appropriate

3.1.3.d. Local SNAP office

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

3.1.4. State Agency Liability

3.1.4.a. For SNAP

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

3.4.1.b. For SNAP-Ed

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

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integrity of funds and demonstrate program *effectiveness* regarding SNAP-Ed outcomes and impacts.

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

3.1.5. Record Retention Requirements and Management

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

3.2. Requirements for SNAP-Ed Plans and Reports

3.2.1. Comprehensive SNAP-Ed Projects and Plans

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

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

Taken together, education, marketing, and *PSE* changes are more effective than any of these *strategies* alone for improving health and preventing obesity. The combination reinforces the various *strategies* used in SNAP-Ed or conducted by partners such as other FNS or CDC programs.

Further details on developing comprehensive SNAP-Ed projects and plans can be found in Section 4.1. Comprehensive Projects and Plans.

3.2.2. SNAP-Ed Plan Overview and Requirements

To request SNAP-Ed grant funds, *State agencies* must submit a *SNAP-Ed Plan* to FNS for approval through the National Program Evaluation and Reporting System (N-PEARS) by August 15 of each year; see Section 4.2. Instructions for Submitting the

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State SNAP-Ed Plan and Annual Report. In accordance with 7 CFR §272.2(d)(2), *SNAP-Ed Plans* must—

- Conform to standards established in regulations, SNAP-Ed Guidance, and other FNS policy. A *State agency* may propose to implement an annual or multiyear Plan of up to 3 years.
- Identify the methods the State will use to notify to the maximum extent possible *applicants*, participants, and eligible individuals of the availability of SNAP-Ed *activities* in local communities. As an example, States may inform potential SNAP-Ed participants through linkages and referrals with facilities and programs that serve the population with low income, such as county offices, *food banks*, public housing, or public assistance offices. Agencies may also provide information on bulletin boards or through electronic media. The "SNAP-Ed Outreach" portion of SNAP-Ed Plan Module 2 covers this requirement; see Section 4.3.2.c. SNAP-Ed Outreach (Plan Module 2, Page 3).
- Describe methods the *State agency* used to identify its *target audience*. States may propose State-specific methods and supporting data sources. State agencies should use the "Needs Assessment Process" page of SNAP-Ed Plan Module 1 to describe how the *State agency* identified the *target audience*; see Section 4.3.1.a. Needs Assessment Process (Plan Module 1, Page 2).
- Include an assessment of the nutrition, physical activity, and obesity prevention needs of the target population in addition to barriers to accessing healthy foods and physical activity. *State agencies* should make certain the *needs assessment* considers characteristics of the target population. The "State-Specific Nutrition and Physical Activity-Related Data on Target Population" and "Community Food Access Data" pages of SNAP-Ed Plan Module 1 cover this requirement; see Section 4.3.1.b.i State-Specific Nutrition and Physical Activity-Related Data on Target Population (Plan Module 1, Page 3) and 4.3.1.b.ii. Community Food Access Data (Plan Module 1, Page 4).
- Ensure *interventions* are comprehensive in scope and appropriate for communities and the eligible population. The *interventions* must recognize the population's constrained resources and potential eligibility for Federal food assistance. The "Program Appropriateness for Diverse Target Audiences" part of SNAP-Ed Plan Module 1 covers this requirement; see Section 4.3.1.b.v. Program Access for Diverse Target Audiences (Plan Module 1, Page 7).
- Describe the evidence-based *nutrition education and obesity prevention services* the State will provide and how the State will implement those services, either directly or through agreements with other State or local agencies or community organizations. SNAP-Ed Plan Modules 2, 3, and 5 cover this requirement; see Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan, Section 4.3.3. Plan Module 3: Planned Projects and Activities, and Section 4.3.5. Plan Module 5: Coordination and Collaboration.

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- Show how the *projects* and *strategies* meet the assessed nutrition, physical activity, and obesity prevention needs of the target population. The "Program Appropriateness for Diverse Target Audiences" part of SNAP-Ed Plan Module 1 covers this requirement; see Section 4.3.1.b.v. Program Access for Diverse Target Audiences (Plan Module 1, Page 7).
- Include *activities* that promote healthy food and physical activity choices based on the most recent DGA. Agencies should describe their planned *projects* in sufficient detail in SNAP-Ed Plan Module 3 to clearly show alignment with the most recent DGA; see Section 4.3.3. Plan Module 3: Planned Projects and Activities.
- Include evidence-based *activities* using two or more *SNAP-Ed Approaches* (see Section 3.3.2. SNAP-Ed Approaches), including individual or group-based direct nutrition education, health promotion, and *intervention strategies* with one or more additional approaches. Agencies will indicate the approaches planned and the evidence base for planned *projects and interventions* in SNAP-Ed Plan Module 3; see Section 4.3.3. Plan Module 3: Planned Projects and Activities.
- Provide a description of the State's efforts to consult and coordinate *activities* with publicly or privately funded national, State, and local nutrition education and health promotion initiatives and *interventions*, including WIC, the *Child Nutrition Programs*, *FDPIR*, and *EFNEP*. States must consult and coordinate with State and local operators of other FNS programs. The State must describe the relationship between the *State agency* and coordinating organization(s). SNAP-Ed Plan Module 5 covers this requirement; see Section 4.3.5. Plan Module 5: Coordination and Collaboration.
- Present an operating budget for the *FY* with an estimate of the cost of operation for 1 year for an annual Plan. An updated budget should also be submitted annually for multiyear Plans. As part of the budget process, the State agency should inform FNS by the end of the first quarter of each *FY* (December 31) of the amount of its prior year allocation that it cannot or does not plan to obligate for SNAP-Ed *activities* by the end of the *FY*. SNAP-Ed Plan Module 6 covers the requirement to present an operating budget; see Section 4.3.6. Plan Module 6: Planned Staffing and Budget.
- Providing additional information about the nutrition education and obesity prevention *strategies* and *interventions* selected along with characteristics of the target population served may be required. This will depend on the content of the State's *SNAP-Ed Plan* and is necessary to determine whether nutrition education and obesity prevention goals are being met.

Additionally, States must actively engage in timely, meaningful, and substantive consultations with Tribes about the SNAP State Plan of Operations, which includes the SNAP-Ed Plan, as required by SNAP regulations at 7 CFR §272.2(b), 7 CFR §272.2(e)(7), and 7 CFR §281.2(b). The consultations must pertain to the unique needs of Tribal members. SNAP-Ed Plan Module 5 covers this requirement; see Section 4.3.5. Plan Module 5: Coordination and Collaboration.

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New: Table 1 lists the seven modules in the SNAP-Ed Plan and summarizes their content. State agencies must complete modules 1, 2, and 7. State and *implementing agencies* planning to conduct SNAP-Ed *projects* must complete module 3. States and/or *implementing agencies* should only complete module 4 when planning to conduct a formal *evaluation*(s). All State and *implementing agencies* must complete modules 5 and 6. Further detail on the contents of each module is provided in Section 4.3. Guidelines for Developing the SNAP-Ed Plan. By late spring 2024, a static version of the SNAP-Ed Plan template will be added to SNAP-Ed Connection; please refer to this document to see all required and optional elements of the SNAP-Ed Plan. **End of new material.**

Table 1. SNAP-Ed Plan Modules Summary

Module 1: Target Audience and Needs Assessment (State agencies only)

- Needs Assessment
  - Identify the Target Audiences and Their Needs
  - Needs Assessment Process
  - State-Specific Nutrition and Physical Activity-Related Data on Target Population
  - Community Food Access Data
  - Demographic Characteristics of SNAP-Ed Target Audiences
  - SNAP Participation
  - Program Access and Appropriateness for Diverse Target Audiences
  - Coordination and Partnerships with Programs and Organizations from Multiple Sectors
  - Agency/Workforce Capacity
  - Selected State Priority Goals Based on Needs Assessment

Module 2: SNAP-Ed Action Plan (State agencies only)

- Objectives and Indicators
- Project SMART Objectives
- SNAP-Ed Outreach
- Action Plan Overview

Module 3: Planned Projects and Activities (State and implementing agencies)

- Brief Information
- Link Project to SMART Objectives
- Approaches (Direct Education, PSE, and/or Social Marketing)

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• Priority Populations • Project Outreach • Direct Education and PSE Settings • Social Marketing Campaign Scale • SNAP-Ed Toolkit Interventions • Other Previously Developed Interventions • New Interventions
Module 4: Planned Evaluations (State and implementing agencies) • Basic Information • Evaluation Details
Module 5: Coordination and Collaboration (State and implementing agencies) • Coordination and Collaboration with Other Federal Nutrition, Obesity Prevention, and Health Programs • Multisector Partnerships/Coalitions • Tribes and Tribal Organizations • Minority-Serving Institutions
Module 6: Planned Staffing and Budget (State and implementing agencies) • Planned Staffing • Implementing Agency Budgets • Project Budgets • Other SNAP-Ed Expenditures • Non-SNAP-Ed Funding • Travel • Budget for Indirect Costs • Estimated Unobligated Balance • Total Budget
Module 7: Assurances and Signatures (State agencies only)

PSE = policy, system, and environment; SMART = specific, measurable, achievable, relevant, and time-specific

Projects are a central organizing feature of the SNAP-Ed Plan. A *project* is defined as:

an *intervention* or a cluster of *interventions* or *activities* with common goals, intended outcomes, target audiences (e.g., youth), and implementation setting types (e.g., school). Project activities include planning and reporting.

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State and *implementing agencies* must organize their proposed *interventions* by *project*; they also must budget by *project* in the SNAP-Ed Plan and submit expenses by *project* in the *Annual Report*.

3.2.3. SNAP-Ed Annual Report Overview and Requirements

The SNAP-Ed *Annual Report* describes *project activities*, outcomes, and expenditures for the prior *FY* and must be submitted by January 31 of each year. *State agencies* are expected to—

- Submit a SNAP-Ed *Annual Report* to FNS by January 31 of each year through N-PEARS. The Report must describe *SNAP-Ed Plan project activities*, outcomes, and budget for the prior year. Annual Plan Modules 1–7 cover this requirement; see Section 4.4. Guidelines for Developing the Annual Report.
- Summarize the nutrition education and obesity prevention *projects* implemented during the *FY* and related achievements; this is accomplished in Annual Report Module 1 (see Section 4.4.1. Report Module 1: Project and Activity Results), Report Module 3 (see Section 4.4.3. Report Module 3: Success Stories), and Report Module 7 (see Section 4.4.7. Report Module 7: Executive Summary).
- Using evaluation and outcome results, discuss the *effectiveness* of the SNAP-Ed *projects* and *interventions* and how they might be improved in the upcoming *FY*; this is accomplished in Annual Report Module 2 (see Section 4.4.2. Report Module 2: Evaluation Reports) and Module 4 (see Section 4.4.4. Report Module 4: Challenges and Modifications from Plan).
- Describe annual and longer-term progress toward achieving objectives; this is accomplished in Annual Report Module 7 (see Section 4.4.7. Report Module 7: Executive Summary).
- Synthesize accomplishments and learnings anticipated to modify current- or future-year objectives, targeting, *interventions*, and partnerships; this is accomplished in Annual Report Module 5 (see Section 4.4.5. Report Module 5: Coordination and Collaboration) and Modules 2, 3, 4, and 7.
- Report on relevant SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention Indicators in Report Module 1 (see Section 4.4.1. Report Module 1: Project and Activity Results). Performance indicators and measures not captured in the standardized sections of Module 3 can be reported at the end of the module. Additional information about the SNAP-Ed priority indicators is available at the online SNAP-Ed Evaluation Framework.

New: Table 2 lists the seven modules in the *Annual Report* and summarizes their content. State and *implementing agencies* must complete modules 1, 2, 5, 6, and 7. State and *implementing agencies* that conducted SNAP-Ed *projects* must complete module 3. States that conducted formal evaluations must complete Module 4. Further detail on the contents of each module is provided in Section 4.4. Guidelines for Developing the Annual Report. In summer 2024, a static version of the *Annual Report* template will be added to SNAP-Ed Connection; please refer to the template to see all required and optional elements of the *Annual Report*. **End of new material.**

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Table 2. Annual Report Modules Summary

1: Project and Activity Results

- Nonproject Activities
- Project Results
  - Interventions Used
  - SNAP-Ed Indicators Measured
  - Project Sites
  - Direct Education
    - Stage
    - Planning a Development Results
    - Languages
    - Reach (race, ethnicity, gender, age)
    - Mode of delivery
    - Outcome Indicators Results
  - PSE Initiatives
    - PSE Change *Maintained*
    - PSE Change *Adopted*
    - Active Partners
  - Social Marketing
    - Stage
    - Planning and Development Results
    - Implementation and evaluation stage results
    - Indirect Education Channels
    - Other Results
    - Priority Populations
    - Link Project to SMART Objectives

2: Evaluation Reports

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

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3. Success Stories

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

4: Challenges and Modifications

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

5: Coordination and Collaboration

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

6: SNAP-Ed Financial Reporting

- Implementing Agency Expenditures
- Project Expenditures
- Other SNAP-Ed Expenditures
- Indirect Cost
- Unobligated Balance from Previous Federal Fiscal Year (FFY)
- SNAP-Ed Total Expenditure
- Program Income (if applicable)

7: Executive Summary

- Key Successes
- SNAP-Ed Projects and Activities
- Reaching the Target Audience

FFY = Federal fiscal year; PSE = policy, system, and environment; SMART = specific, measurable, achievable, relevant, and time-specific

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3.2.4. Timeline for Plan and Annual Report Submission and Approval

See table 3 for this timeline.

Table 3. Timeline for Plan and Annual Report Submission and Approval

Date	Action
August 15	*SNAP-Ed Plan* submission period for the coming *FY*. Annual Plans and updates to multiyear Plans for the coming *FY* must be submitted by August 15 in N-PEARS
October 1	Approval date or Regional Office response to States on Plan
December 31	Provide status of prior *FY* allocation
January 31	Due date for *Annual Reports* in N-PEARS
May 1	Due date for Plan Amendments for current *FY* in N-PEARS

N-PEARS = National Program Evaluation and Reporting System

3.3. Requirements for SNAP-Ed Projects and Interventions

SNAP-Ed *interventions* must be evidence-based and align with appropriate sources of nutrition and obesity prevention guidance. State agencies must include *interventions* in their *SNAP-Ed Plans* that cover at least two of the three *SNAP-Ed Approaches*. FNS reviews SNAP-Ed projects in the *SNAP-Ed Plan*, *Annual Report,* and during *MEs*.

3.3.1. Sources of Nutrition and Obesity Prevention Guidance

3.3.1.a. Dietary Guidelines for Americans

The FNA requires SNAP-Ed to conduct nutrition education and obesity prevention interventions for the SNAP-Ed-eligible population. Therefore, healthy eating patterns, weight management, and physical activity should be key components of SNAP-Ed. Based on scientific evidence on diet and health, the DGA is the foundation of nutrition education and efforts to prevent diet-related health conditions, including obesity, in all FNS nutrition assistance programs. **The FNA stipulates that SNAP-Ed activities, strategies, and interventions should be consistent with the DGA and the associated USDA food guidance system, MyPlate**. States are strongly encouraged to incorporate MyPlate resources in their *SNAP-Ed Plans* because these resources are aligned with the evidence-based DGA. MyPlate is the consumer-friendly translation of the DGA to help individuals, families, and communities implement the science-based recommendations. MyPlate messages and resources are available at the MyPlate website.

SNAP-Ed *intervention strategies* may focus on limiting or increasing consumption of certain foods, beverages, and nutrients consistent with the DGA. **However, States may not use SNAP-Ed funds to endorse, promote, or convey negative written, visual, or verbal expressions about any specific brand of food, beverage,**

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commodity, or retail store. FNS encourages *State agencies* to consult with their SNAP-Ed Regional Coordinators to ensure the content and program efforts appropriately convey the most current DGA and MyPlate messaging. For more information, refer to the USDA Center for Nutrition Policy and Promotion's (CNPP) website.

New: CNPP's MyPlate is a modern, customizable approach to healthy eating based on the DGA. No matter the age, healthy eating is important. What people eat and drink matters. MyPlate is intentionally simple. It represents the amounts from each food group to try to consume regularly over time, whether eaten on a plate, in a bowl, or another way. MyPlate.gov offers a full range of free consumer-tested digital tools and resources, including personalized eating plans based on age, weight, height, sex, and activity level; recipes; tips for shopping; and more. All of these resources can be adapted to different lifestyles, cultural food preferences, and dietary needs and are available for free.

- Consumers can start by taking the MyPlate Quiz (available in English and Spanish) to see how their eating habits stack up against the MyPlate recommendations. Based on the answers, they will receive tailored resources and a personalized quiz results code to sync with the Start Simple with MyPlate app.
- Consumers can download the Start Simple with MyPlate app to set daily, achievable Food Group goals to help eat healthy throughout the day and week. They can sync their results from the MyPlate Quiz for a personalized experience. They can also join challenges, see progress, and earn badges to celebrate successes.
- For a more personalized plan based on a person's age, sex, height, weight, and physical activity level, consumers can get their MyPlate Plan that provides a plan with specific food groups targets, indicating what and how much to eat within a calorie level. There are 31 calorie levels that are available in both English and Spanish. A widget is also available to easily embed on any website.
- Consumers can use Shop Simple with MyPlate to save money while shopping for healthy food choices by finding cost savings in their local area and discovering new ways to prepare budget-friendly foods. In the "Savings" area of the tool, they can enter their ZIP Code to find cost-saving opportunities in their local area, including stores and farmers markets that accept SNAP electronic benefit transfer (EBT) and rewards programs (e.g., GusNIP incentive programs).[7] In the "Foods" section, consumers can get budget-friendly suggestions from each food group, purchasing and storage tips, serving ideas, recipes, and nutrition information.

[7] The Gus Schumacher Nutrition Incentive Program (GusNIP) funds and evaluates projects to increase the purchase of fruits and vegetables among SNAP participants.

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- MyPlate Kitchen offers more than 1,000 healthy recipes available in English and in Spanish. Consumers can sort through recipes by Food Groups, cooking equipment, cuisine and so much more.

Consumers can follow MyPlate on X (Twitter), Facebook, or Instagram, or get email updates through GovDelivery for nutrition tips, special campaigns, or health observances. **End of new material.**

Other resources that complement the DGA and can assist States in addressing healthy weight management and obesity prevention include the Physical Activity Guidelines (PAG), Healthy People 2030 Plan, and U.S. Food and Drug Administration (FDA) Nutrition Facts Label and Menu Labeling.

3.3.1.b. Physical Activity Guidelines for Americans

The PAG provides science-based information and guidance on the amounts and types of physical activities Americans 6 years and older need for health benefits. The PAG is intended for health professionals and policy makers and is accompanied by resources to help guide the physical activity of the general public. The DGA provides physical activity recommendations that encourage Americans to meet the PAG.

3.3.1.c. Healthy People 2030 Plan

The Healthy People 2030 Plan (HP 2030) has science-based, 10-year national objectives for improving the health of all Americans that include established benchmarks to monitor progress over time. Data and resources associated with the Nutrition and Healthy Eating and Physical Activity objectives of HP 2030 can assist States in formulating objectives and selecting *interventions*. Find more information on the HP 2030 website.

3.3.1.d. Nutrition facts label and menu labeling

New: FDA's public health education campaign "The Nutrition Facts Label: What's in It for You?**"** provides consumers, health educators, and other health professionals with information about how to use the Nutrition Facts label as a tool for maintaining healthy dietary practices. A portfolio of materials, including factsheets, toolkits, middle and high school curricula, games, and videos, are available to help raise awareness about and increase the use of the label. FDA's Interactive Nutrition Facts label tool helps users explore all the information on the label and users can test their knowledge using the Fun Facts Quiz**.**

Menu Labeling requires calories to be listed on many menus and menu boards of restaurants and other food establishments that are part of a chain of 20 or more locations. In addition to calorie information, covered establishments are also required to provide written nutrition information such as saturated fat, sodium, and dietary fiber to consumers on request. Find more information on Menu Labeling on the Calories on the Menu website. **End of new material.**

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3.3.2. SNAP-Ed Approaches

The Final Rule stipulates that SNAP-Ed activities must include *evidence-based* activities using two or more of these *SNAP-Ed Approaches*.

3.3.2.a. SNAP-Ed Approach One: individual or group-based direct nutrition education, health promotion, and intervention strategies

Activities conducted at the individual and interpersonal levels remain important as a nutrition education delivery *SNAP-Ed Approach* in SNAP-Ed. **These activities must be evidence-based, as with interventions conducted through the other approaches.** Direct nutrition education may be conducted by a SNAP-Ed provider organization or by a partner organization through a collaborative effort.

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

- Behaviorally focused *strategies*
- Motivators and reinforcements that are personally relevant to the *SNAP-Ed-eligible* audience.
- Multiple channels of communication to convey healthier behaviors
- Approaches that foster active personal engagement
- Intensity and duration that provide opportunities to reinforce behaviors

Some examples of *SNAP-Ed Approach* One allowable *activities* for States to consider include the following:

- Conduct nutrition education based on the DGA 2020–2025:
  - Follow a healthy dietary pattern at every life stage.
  - Customize and enjoy nutrient-dense food and beverage choices to reflect personal preferences, cultural traditions, and budgetary considerations.
  - Focus on meeting food group needs with nutrient-dense foods and beverages and stay within calorie limits.
  - Limit foods and beverages higher in added sugars, saturated fat, and sodium, and limit alcoholic beverages.
- Conduct individual or group educational sessions on achieving and maintaining a healthy body weight based on the DGA.
- Integrate nutrition education into ongoing physical activity group *interventions* based on the U.S. Department of Health and Human Services' (HHS) Physical Activity Guidelines.
- Implement classes to build basic skills, such as cooking, menu planning, or food resource management.

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- Sponsor multicomponent communication *activities* to reinforce education, such as interactive websites, social media, visual cues, and reminders such as text messages. An example would be the Eating Smart Being Active curriculum.
- Deliver curricula and *interventions* virtually. For virtual programming, agencies are still responsible for collecting demographic information, establishing protocols, and measuring behavior change. Agencies are also required to display the SNAP "And Justice for All" poster in a readable way.

3.3.2.b. SNAP-Ed Approach Two: comprehensive, multilevel interventions at complementary organizations and institutional levels

SNAP-Ed Approach Two may address several or all elements of the SEM and may focus on the individual, the interpersonal (family, friends, etc.), the organizational (workplace, school, etc.), the community (food retailers, food deserts, etc.), and the public policy or societal (local laws, social norms, etc.) levels. Everyone has a role in helping support healthy eating patterns in multiple settings nationwide, from home to school to work to communities where people live, learn, work, shop, and play. **A key tenet of multilevel interventions is to reach the *SNAP-Ed-eligible* audience at more than one level of the SEM, and the interventions mutually reinforce one another.** *Multilevel interventions* generally are thought of as having three or more levels of influence.

In SNAP-Ed, States may implement PSE change efforts using the multilevel interventions of SNAP-Ed Approach Two according to the definition of nutrition education and obesity prevention services in Section 2: Introduction to SNAP-Ed.

Examples of efforts from *SNAP-Ed Approach* Two that States may want to implement in conjunction with *SNAP-Ed Approach* One include the following:

- Develop and implement nutrition and physical activity policies at organizations with high proportions of people eligible for SNAP-Ed, such as worksites that employ low-wage earners or eligible youth- and faith-based organizations.
- Collaborate with schools and other organizations to improve the school nutrition environment, including supporting and providing nutrition education classes and serving on school wellness committees. Local educational agencies (LEAs) are encouraged to include SNAP-Ed coordinators and educators on local school wellness policy committees (see Section 3.5.4.i. Partnering with School Wellness Programs).
- Coordinate with outside groups to strategize how healthier foods may be offered at sites, such as emergency food distribution sites frequented by the target audience.
- Establish community food gardens in eligible locations, such as public housing sites, eligible schools, and qualifying community sites, which will reap benefits at the individual, interpersonal, and community levels.

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- Provide consultation, technical assistance, and training to SNAP-authorized retailers in supermarkets, grocery stores, or corner or country stores. SNAP-Ed providers may work with partners on strategic planning and provide assistance with marketing, merchandising, recipes, customer newsletters, and technical advice on product placement. Retailers could provide produce, healthy nutrition items, and point of sales space for a healthy checkout lane.
- Work to bring farmers markets to eligible locations, such as advising an existing market on the process for obtaining EBT machines to accept SNAP benefits.
- Coordinate with WIC to promote and support breastfeeding *activities*.

3.3.2.c. SNAP-Ed Approach Three: community and public health approaches to improve nutrition and obesity prevention

Community and *public health approaches* are efforts that affect a large segment of the population, rather than focusing on the individual or a small group. According to CDC, public health interventions are community-focused, population-based *interventions* aimed at preventing a disease/condition or limiting death/disability from a disease/condition. Community and *public health approaches* may include three complementary and integrated elements: education, marketing/promotion, and *PSE interventions*. Using these three elements helps create conditions where people are encouraged to act on their education and awareness and where the healthy choice becomes the easy and preferred choice, which is facilitated through changes in *policy, systems, and the environment*.

By focusing *activities* on settings with large proportions of *people with low income* and using *evidence-based interventions* based on formative research with SNAP-Ed audiences, *public health approaches* can reach large numbers of Americans with low income and produce a meaningful impact. Learn more about *public health approaches* through the CDC's Public Health 101 Series. *SNAP-Ed Approach* Three *interventions* tend to target socioeconomic and contextual factors, resulting in greater population health impact with less effort required of individuals affected by the *interventions* (see the Health Impact Pyramid, figure 2).

As with SNAP-Ed Approach Two, PSE change efforts also may be conducted using community and public health approaches.

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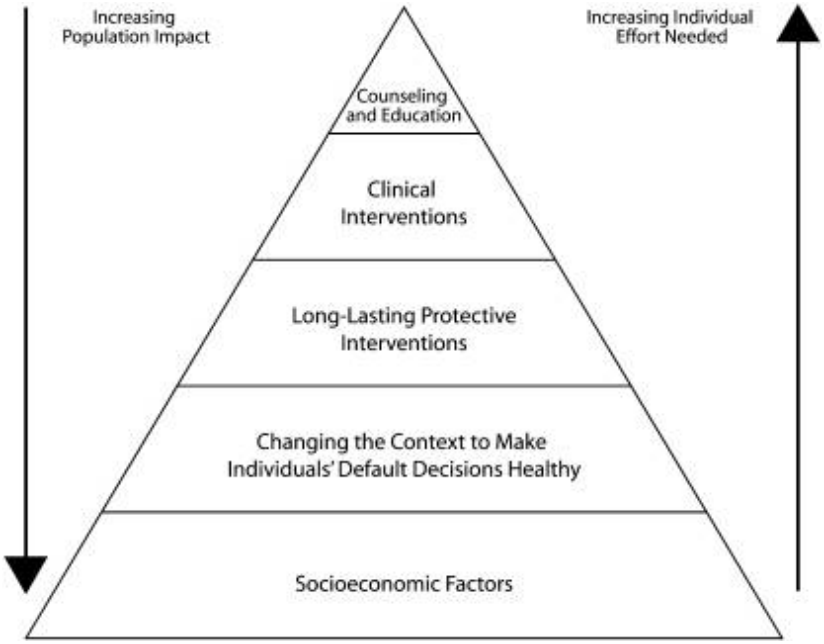
Figure 2. The Health Impact Pyramid



Source: Frieden, T. R. (2010). Framework for public health action: The health impact pyramid. *American Journal of Public Health, 100*(4), 590–595. doi: https://doi.org/10.2105/AJPH.2009.185652

SNAP-Ed Approach Three *activities* to consider where SNAP-Ed could assist include the following:

- Work with local governments in developing policies to improve healthy food access in eligible areas.
- Collaborate with community groups and other organizations, such as Food or Nutrition Policy Councils, to improve food, nutrition, and physical activity environments to facilitate the adoption of healthier eating and physical activity behaviors among the *SNAP-Ed-eligible* population.
- Serve on other relevant nutrition- and/or physical activity-related State and local advisory panels, such as school wellness committees and State Nutrition Action Councils (SNACs).
- Deliver technical assistance to a local corner or convenience store to increase healthier offerings and purchases. Corner stores, often referred to as convenience stores, country stores, or bodegas, are small-scale stores that may have a more limited selection of food and other products. The Healthy Corner Stores Guide provides information, *strategies*, and resources for organizations interested in making healthy foods and beverages more available in corner stores within their communities. A Spanish-language version is also available at the link above.
- Facilitate the reporting of statewide surveillance and survey data on nutrition indicators among the population eligible to receive SNAP benefits.

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- Conduct *social marketing* programs targeted to *SNAP-Ed-eligible* populations about the benefits of physical activity.
- Conduct health promotion efforts, such as promoting the use of a walking trail through a Safe Routes to Schools program or the selection of healthy foods from vending machines.
- Help local workplaces establish policies for healthy food environments.
- Partner with nonprofit hospitals to coordinate their Internal Revenue Service–mandated community benefits program with SNAP-Ed (see Internal Revenue Bulletin: 2015-5 for details).

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

3.3.3. Social Marketing

Social marketing programs can be used to deliver nutrition messages to a large SNAP-Ed audience. *Social marketing* may be delivered as part of the *multilevel interventions* of *SNAP-Ed Approach* Two or as part of community and public health efforts of *SNAP-Ed Approach* Three.

As described by CDC, *social marketing* is "the use of marketing theory, skills, and practice to achieve social change, promote the general health, raise awareness, and induce changes in behavior."[8]

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

Social marketing interventions can be an important component of some SNAP-Ed *projects* and may target the individual, organizational/institutional, and societal levels. *Social marketing* emphasizes—

- Focusing on an identified segment of the *SNAP-Ed-eligible* audience. This would be equivalent to your *priority population*, or the population your agency aims to reach through the project.
- Identifying and addressing needs of the *priority population* and potential barriers to behavior change

[8] Centers for Disease Control and Prevention (2023). *Social marketing*. https://www.cdc.gov/hiv/effective-interventions/respond/social-marketing/index.html

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- Interacting with the *priority population* to test the message, materials, approach, and delivery channel to ensure they are understood and likely to lead to behavior change
- Adjusting messages and delivery channels through continuous feedback using evaluation data and *priority population* engagement

The advertising and public relations aspects of *social marketing* programs can reach *SNAP-Ed-eligible* audiences through a variety of delivery channels such as the following:

- Mass media (e.g., television, radio, newspapers, billboards, other outdoor advertising)
- Social media (e.g., social networks, blogs, user-generated content)
- Earned media (e.g., public service announcements, letters to the editor, opinion editorials, press conferences)
- Peer-to-peer popular opinion leaders (e.g., youth or parent ambassadors, local champions, celebrity spokespersons, faith leaders)
- Promotional media (e.g., point-of-purchase prompts, videos, websites, newsletters, posters, kiosks, brochures, educational incentive items)

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

- National Cancer Institute's Health Information National Trends Survey
- Pew Research Center's Internet and Technology

3.3.4. Policy, Systems, and Environmental Change Interventions

PSE change efforts can be implemented across a continuum and may be employed as part of the *multilevel interventions* of *SNAP-Ed Approach* Two, in a more comprehensive way through the community and *public health approaches* of *SNAP-Ed Approach* Three, or as a combination of all three. **FNS encourages PSE changes that enhance the sustainability and effectiveness of SNAP-Ed activities in communities.**

The following definitions and examples can contribute to States' greater understanding of SNAP-Ed's role in implementing *PSEs*.

3.3.4.a. Policy

Policy is a written statement of an organizational position, decision, or course of action. Ideally, policies describe actions, resources, implementation, evaluation, and

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enforcement. Policies are made in the public, nonprofit, and business sectors. Policies can help guide behavioral changes for audiences served through SNAP-Ed programming.

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

3.3.4.b. Systems

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

> **Example:** A local Food Policy Council creates a farm-to-fork system that links farmers and local distributors with new retail or wholesale customers in eligible settings. The local SNAP-Ed provider could be an instrumental member of this Food Policy Council providing insight into the needs of the *SNAP-Ed-eligible* audience.

3.3.4.c. Environment

Environment includes the built and physical environments that are visual/observable but may include economic, social, normative, or message environments. Modifications in settings where food is sold, served, or distributed may promote healthy food choices. Social changes may include shaping attitudes among administrators, teachers, or service providers about the time allotted for school meals or physical activity breaks.

Economic changes may include financial disincentives or incentives to encourage a desired behavior, such as purchasing more fruits and vegetables. **SNAP-Ed funds may not be used to provide the cash value of financial incentives, but SNAP-Ed funds may be used to engage farmers markets and retail outlets to collaborate with nutrition education and healthy food access efforts.**

> **Example:** A food retailer serving SNAP participants or other *people with low income* increases the variety of fruits and vegetables sold and displays them in a manner to encourage consumer selection of healthier food options based on the DGA and MyPlate. A SNAP-Ed provider can provide consultation and technical assistance to the retailer on expanding its fruit and vegetable offerings and behavioral techniques to position produce displays to reach the *SNAP-Ed-eligible* audience. Find more examples of how to support healthy food environments at the Healthy Food Environments website.

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SNAP-Ed should be seen as a consultant and technical adviser for creating *PSE* changes that benefit communities eligible for SNAP-Ed rather than the provider of services.

SNAP-Ed aids organizations so they can adopt, maintain, and enforce *PSE* changes themselves without continuous involvement from SNAP-Ed. This approach will also likely facilitate sustainable *PSE* changes as organizations take ownership of the *PSE* change.

PSE changes should reflect input from partner organizations and community members served by the organizations to demonstrate that "no service system can be effective or sustained unless it is grounded in, reflective of, and has the full participation of the community it is designed to serve."[9]

Examples of successful SNAP-Ed partnerships implementing *PSE* changes can be found in the SNAP-Ed Library.

3.3.5. Evidence-Based Approach to SNAP-Ed

An *evidence-based approach* for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available *practice-based evidence*. The three evidence-based approaches are referred to as "levels of evidence" in N-PEARS:

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

FNS recognizes a continuum for evidence-based practices, ranging from the rigorously evaluated *interventions* (research-based) that have undergone peer review, to *interventions* that have not been rigorously tested but show promise based on results from the field (practice-based, including *emerging interventions*). SNAP-Ed funds may be used to build stronger evidence for *interventions* through evaluation. See Section 3.5. Financial and Cost Policy for more detail on *allowable costs*.

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

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3.3.5.a. Evidence-based approach expectations

FNS expects that SNAP-Ed providers ensure their evidence-based *interventions* accomplish the following:

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

3.3.5.b. Finding evidence-based materials

Curricula and other materials FNS develops are evidence-based. FNS materials have undergone formative evaluation during the developmental phase, review by USDA and HHS experts, and testing with the *SNAP-Ed-eligible* audience in most instances. Therefore, curricula and other educational materials developed for SNAP-Ed, such as MyPlate for My Family and Eat Smart, Live Strong, and materials developed by Team Nutrition, are considered evidence-based.

The SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States, also known as the *SNAP-Ed Toolkit*, features evidence-based *PSE* changes that support education and *social marketing* and provides ways to evaluate *interventions* across various settings. This toolkit was developed by the National Collaborative on Childhood Obesity Research (NCCOR) at the request of FNS. Updates will continue to add *strategies* and *interventions* being used successfully to address *nutrition security* in communities across the Nation. While not an exhaustive compilation of potential *strategies* and *interventions* appropriate for SNAP-Ed, it is a starting point for ideas States may use to further their obesity prevention and *nutrition security* efforts through SNAP-Ed.

3.3.5.c. Selecting measurement tools to evaluate interventions

When validated evaluation tools or instruments are not available for an *intervention*, the *State* or *implementing agencies* may need to adapt existing tools or develop new ones. When developing new tools or adapting existing tools for the *target audience*, established protocols for instrument development should be followed. **New:** For detailed guidance on choosing measurement tools to collect individual-level behavior outcome data, see chapter 3 in the SNAP-Ed Behavior Outcome Measurement Toolkit. **End of new material.** Additionally, information on the process for developing reliable and valid

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evaluation instruments/tools is provided in chapter 4 of FNS's *Addressing the Challenges of Conducting Effective SNAP-Ed Evaluations: A Step-by-Step Guide*.[10]

It is recommended that *implementing agencies* discuss evaluation tool adaptation or development ideas with their *State agency*. *State agency* staff should discuss with their SNAP-Ed Regional Coordinator to avoid duplications of effort within the State or region or across regions. Evaluations should focus on specific, current SNAP-Ed *interventions* or initiatives in the State's *SNAP-Ed Plan*. Lastly, before modifying any existing evaluation tool(s), contact the specific developer(s) to obtain permission and to gain insight into whether modifications would affect the validity of the evaluation tool.

3.3.5.d. SNAP-Ed Evaluation Framework priority indicators

The FNS SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention Indicators (Evaluation Framework, see figure 3) was released in 2013 by the FNS Western Regional Office, updated in 2014, and finalized with experts and stakeholders' input at the national level in 2016. The Evaluation Framework includes a focused menu of 51 evaluation indicators that align with SNAP-Ed guiding principles. The indicators lend support to documenting changes resulting from multiple nutrition education and obesity prevention approaches geared toward the *SNAP-Ed-eligible* audience. The interactive SNAP-Ed Evaluation Framework provides more details on evaluation indicators and measurement tools.

FNS has identified seven indicators as priority indicators:

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

All agencies are strongly encouraged to measure priority indicators and to report on any indicators they measure.

[10] Cates, S., Blitstein, J., Hershey, J., Kosa, K., Flicker, L., Morgan, K., & Bell, L. (2014, March). *Addressing the challenges of conducting effective Supplemental Nutrition Assistance Program Education (SNAP-Ed) evaluations: A step-by-step guide*. Altarum Institute and RTI International for U.S. Department of Agriculture, Food and Nutrition Service.

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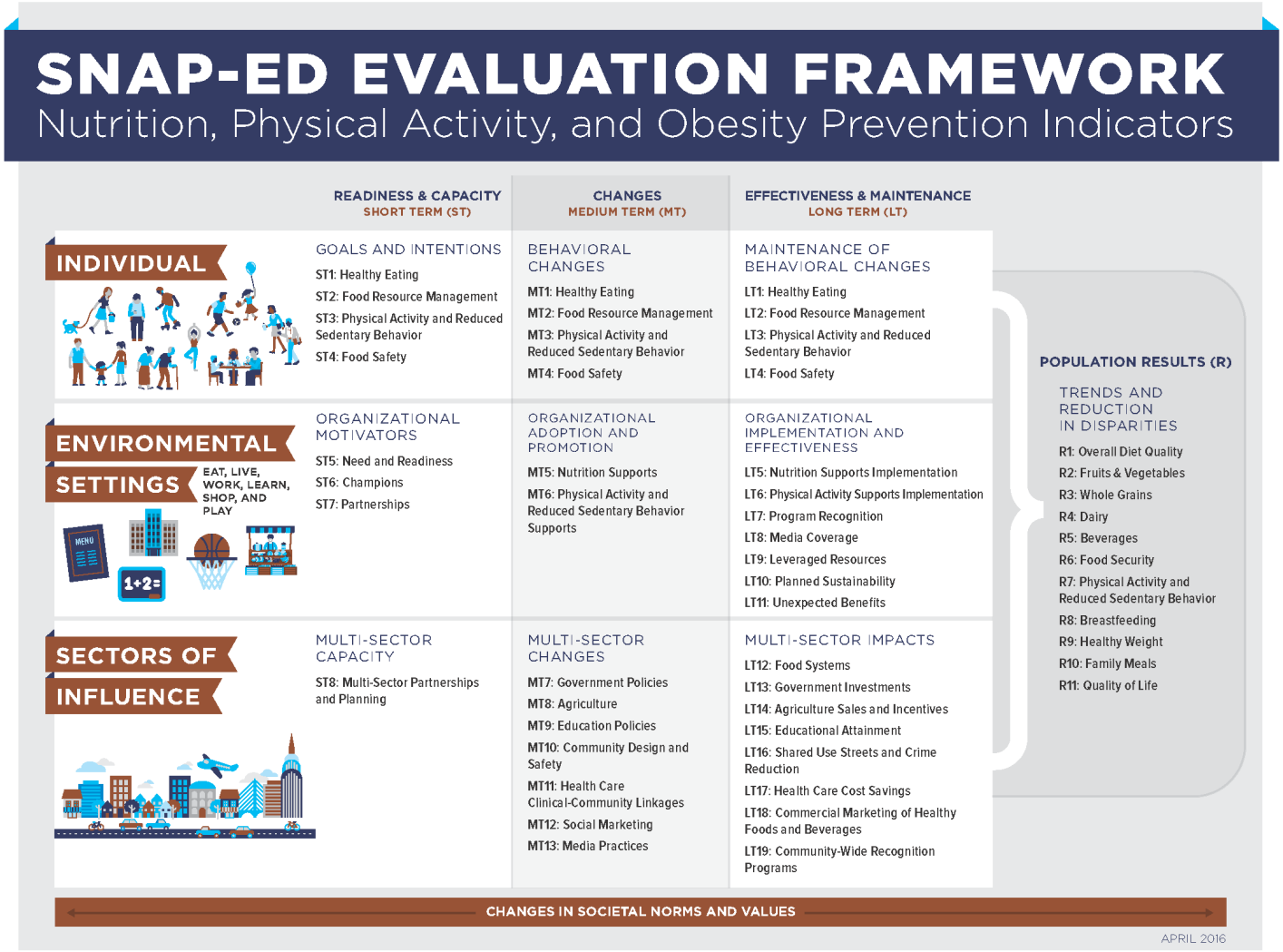
Figure 3. SNAP-Ed Evaluation Framework



Source: Food and Nutrition Service, Association of SNAP Nutrition Education Administrators, & National Collaborative on Childhood Obesity Research. (2016). *SNAP-Ed evaluation framework: Nutrition, physical activity, and obesity prevention indicators*. U.S. Department of Agriculture. https://snaped.fns.usda.gov/snap/EvaluationFramework/SNAP-EdEvaluationFramework.pdf

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3.3.5.e. Types of evaluation

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

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

3.3.6. Management Evaluation Review of State SNAP-Ed Projects

Although not a direct part of the *SNAP-Ed Plan* or *Annual Report*, the information about *MEs* can assist in the development of *SNAP-Ed Plans* to remind States of the documentation they must be able to provide during an onsite review. Selection of SNAP-Ed *projects* for onsite *ME* reviews should be based on one or more of the following factors:

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

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This review will assess whether—

- The *State agency* has a process in place to review and monitor *grantees'* and *subgrantees'* program operations.
- Operations are consistent with the terms of the approved Plan.
- *Activities* are targeted to participating and potentially eligible SNAP clients.
- Nutrition education and obesity prevention *activities* are being evaluated for *effectiveness*.
- The State is examining and documenting the progress being made toward reaching the Plan goals.
- Administrative expenses are reasonable, necessary, and properly documented and allocated.
- States are submitting developed materials for sharing on the SNAP-Ed Connection website.
- States are adhering to Civil Rights and Equal Employment Opportunity requirements.

3.4. Requirements for Coordination and Collaboration

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

FNS expects States to coordinate SNAP-Ed activities with other national, State, and local nutrition education, obesity prevention, and health promotion initiatives and interventions, whether publicly or privately funded. States must consult and coordinate with State and local operators of other FNS programs, including WIC, NSLP, Farm to School, and *FDPIR* to ensure SNAP-Ed complements those programs' efforts to address *nutrition security* and obesity prevention. States are encouraged to coordinate *activities* with other federally funded nutrition education programs, such as the *EFNEP* and the CSFP. SNAP-Ed also coordinates and collaborates with agencies and community partners that provide healthcare or address social determinants of health. States are required to describe their coordination efforts in their *SNAP-Ed Plans* following the instructions contained in Section 4.3.5. Plan Module 5: Coordination and Collaboration.

3.4.1. Data Exchange Guidance

7 CFR §272.1(c)(1) provides the limited circumstances where *State agencies* may disclose information obtained from SNAP *applicant* or recipient households. These

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provisions permit the disclosure of this information to those directly connected with the administration of SNAP, including SNAP-Ed.

For the purposes of SNAP-Ed, these provisions apply to the sharing of SNAP participant data between States and *implementing agencies*. All agencies must adhere to protections for all SNAP *applicant* or recipient household data, which may be used to identify individual SNAP *applicants* or recipients, also known as personally identifiable data (PII).

Participant data must be stored and exchanged using encrypted servers. All individuals who will be handling PII must be trained on secure access and use and must annually sign a document stating they understand their responsibilities.

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

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

3.4.1.a. Data exchange examples

3.4.1.a.i. Use of participant data for program evaluation

The Oregon Department of Human Services (OR DHS) contracted with Oregon State University (OSU) Extension for outcome evaluation of their Food Heroes project. The evaluation consisted of a phone survey with a goal sample size of 300 to 400 participants per county in 4 counties. These phone surveys were paired with baseline data collected in the same areas to facilitate comparison. Phone surveys were used to gain more responses than would have been possible with paper and online surveys. Subjects were recruited using a list of Oregon SNAP participants provided by OR DHS, which included household members' names, addresses, phone numbers, and household composition. All SNAP participants in county ZIP Codes first received a direct-mail notification so they were aware they could be contacted to participate in the survey. A random sample of participants from each ZIP Code was contacted without tracking individuals.

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

3.4.1.a.ii. Contract language for exchange of data

Rhode Island Department of Human Services entered into a contract with Brown University's Rhode Island Innovative Policy Lab to provide contact data, including full name, address, phone number, and email address for SNAP clients, for a pilot survey of

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

3.4.1.b. Multi-State SNAP-Ed partnerships guidance

SNAP-Ed funds may be used to collaborate with other State SNAP-Ed agencies and *implementing agencies* to leverage resources to deliver education programming or enhance *PSE* changes to promote healthy eating and active lifestyles. This type of partnership may be beneficial in providing SNAP-Ed services to Tribal organizations, hard-to-reach rural locations, and communities in interstate border areas.

State and *implementing agencies* must have signed MOUs on file detailing each type of contribution from each entity. Details such as funding amounts, responsibilities of each entity, *activities*, types and methods of evaluation, and timelines should be included.

This type of multi-State partnership should be included in the State *SNAP-Ed Plan* of each entity in the collaboration on the relevant pages. For example, agencies collaborating with another State's WIC program should report that in the Coordination and Collaboration module.

3.4.1.c. Opportunities for collaboration with SNAP-Ed

3.4.1.c.i. Nonprofit hospitals

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

3.4.1.c.ii. State Nutrition Action Council

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

Many States still effectively operate a SNAC or similarly named groups today. SNACs can serve as a model for coalescing State programs around nutrition education and obesity prevention efforts. Several States have established SNAP-Ed Advisory Committees that include representatives from the FNS nutrition assistance programs but

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have the SNAP *State agency* taking the lead role. FNS encourages States to engage in these types of collaborative efforts.

In *FY* 2016, each FNS Regional Office was charged with establishing a new SNAC (or similar council) in one State with a high obesity rate, as defined by CDC, to align nutrition and obesity prevention *activities* across programs. FNS Regional Offices may assist States in establishing and supporting SNACs or similar councils to focus on improving *nutrition security*.

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

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

The Public Health Institute Center for Wellness and Nutrition developed the SNAC Toolkit to guide SNACs through the process of establishing partnerships to successfully implement obesity prevention initiatives and improve the health of the most at-risk communities.[11]

3.4.1.d. Related State and Federally Funded Programs

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

3.4.1.e. Tribal Organizations

3.4.1.e.i. Tribal Organization consultation requirements

FNS requires State agencies to consult with Tribes about the SNAP State Plan of Operations, which includes the State SNAP-Ed Plan. In *FY* 2022, FNS issued policy memorandum "Tribal Consultation Requirements" to clarify USDA's and FNS's expectations and requirements for Tribal consultations. **FNS expects SNAP State agency officials to engage in timely, meaningful, and substantive dialogue with the official leadership of Tribes, or their designated representatives, as outlined in this policy memorandum and as required by SNAP regulations at 7 CFR §272.2(b), §272.2(e)(7), and 7 CFR §281.2(b).**

[11] Mills, M.A., DeLisio, A., & Vitulli, S. (n.d.). *State Nutrition Action Council (SNAC) toolkit: A guide for developing state-level, cross-*
https://centerforwellnessandnutrition.org/wp-content/uploads/2018/12/SNAC-Toolkit-Final.pdf

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Per these regulations, *State agencies* must maintain records of consultations held with Tribes on State Plans, which include the State *SNAP-Ed Plan*, and make them available for review by FNS. These records need not be submitted with the plan, but any portion of the Plan pertaining to SNAP-Ed implementation for citizens of the Tribe on reservations should reflect these consultations. *State agencies* must also provide Tribes with all portions of the State Plan relevant to SNAP operations on Tribal lands, including SNAP-Ed operations, and provide 30 days for written comment. The comment period should be completed prior to the *SNAP-Ed Plan* submission.

State agencies should explicitly describe any consultation that occurred with Tribes in their annual SNAP State Plan of Operations, which include *SNAP-Ed Plans*. FNS SNAP-Ed Regional Coordinators are unable to approve *SNAP-Ed Plans* that do not include the following:

- Name of the Tribe participating in the consultation
- Name and title of the primary contact
- Nature of planned consultation, coordination, and collaboration efforts, including staff time in *full-time equivalents (FTEs)* and funding distribution to Tribe if applicable
- Brief description of the outcome of the consultation and how it will impact the State *SNAP-Ed Plan*
- Description of written comments received

Effective engagement by *State agencies* with Tribes is essential to meeting the nutrition needs of Tribal citizens. *State agencies* should engage with Tribal leaders to establish a consultation relationship, discussing Tribes' preferences and needs regarding consultation. *State agencies* must also include and consider the needs of AI/AN populations in conducting a holistic *needs assessment* for SNAP-Ed, and coordinate with State and local operators on how those *needs assessments* can be conducted. States should make efforts to include a focus and devotion of resources to Native nutrition education.[12]

See the Memorandum on Tribal Consultation Requirements. FNS also issued a policy memorandum to provide guiding principles to assist *State agencies* in meeting regulatory Tribal consultation requirements; see Memorandum on State Tribal Consultation Best Practices.

The Tribal Leaders Directory includes contact information and an interactive map that offers more information on the federally recognized Tribes in a State.

3.4.1.e.ii. Tribal Organization collaboration through FDPIR

States are encouraged to seek out *FDPIR* programs to help foster relationships with SNAP-Ed and Tribal communities. Other organizations that may be experienced in working with Tribes, especially organizations that may be submitting proposals to receive SNAP-Ed funding, are encouraged to seek partnerships with Tribes for nutrition

[12] The United States Department of Agriculture Food and Nutrition Service. (2022, September). *Memorandum on Tribal consultation requirements.* https://www.fns.usda.gov/snap/memorandum-on-tribal-consultation-requirements

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education implementation. **States are expected to provide technical information and training on how Tribes can best submit proposals for SNAP-Ed funding.**

Examples of collaborative *activities* with Indian Tribes and SNAP-Ed follow:

- An *implementing agency* working with communities in urban and rural Tribal areas to develop culturally relevant and resonant materials, such as recipes using traditional foods such as bison and materials provided in Tribal languages
- A university and a Tribal Nutrition Services Program developing a video demonstrating healthy, culturally relevant cooking recipes for television or internet use
- SNAP-Ed engaging with Indian Health Services and local clinic staff to create system changes, such as encouraging and providing recommendations for physical activity
- Direct nutrition *interventions* such as cooking classes or interactive educational *interventions*
- Nutrition education classes on general nutrition, infant nutrition, food safety, food resource management, encouraging more fruit and vegetable consumption, etc.
- Staff working with Tribal community volunteers to plant a kitchen garden at an *FDPIR* program site

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

FNS encourages States to collaborate with *FDPIR* program operators and nutritionists to conduct nutrition education and explore opportunities to increase nutrition education funding and resources to provide the greatest benefit to *FDPIR* participants. FNS provides nutrition resources to promote and help *FDPIR* participants make the most of USDA Foods including Product Information Sheets for each USDA food item and an *FDPIR* Sharing Gallery. State and local contact information for *FDPIR* programs is available from FNS Regional Office SNAP-Ed Coordinators or through the FDPIR Programs Contact webpage.

To learn more about *FDPIR*, visit Food Distribution Program on Indian Reservations.

To access the *FDPIR* Foods Available List, visit USDA Foods Available List for FDPIR.

To access USDA Foods Product Information Sheets, with storage, preparation tips, nutrition information, and recipes, visit Household Programs USDA Foods Product Information Sheets and Recipes.

To access nutrition education materials, recipes, photos, videos, tip sheets, and more, visit the FDPIR Sharing Gallery.

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3.4.1.f Commodity Supplemental Food Program

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

FNS encourages States to collaborate with *CSFP* local agencies and Tribes to conduct and evaluate nutrition education *activities* and explore opportunities to increase nutrition education funding and resources to provide the greatest benefit to older adults with low income. FNS provides information about nutrition including resources to help promote and make the most of *CSFP* USDA Foods via Product Information Sheets for each USDA food item and a CSFP Sharing Gallery. To learn more about *CSFP*, visit Commodity Supplemental Food Program.

3.4.1.g. CDC-funded programs

FNS recommends that *State agencies* explore and engage in collaborative opportunities with CDC-funded nutrition, physical activity, and obesity prevention grant programs in their State. CDC funds agencies that may be potential partners and are already working to improve nutrition and physical activity and prevent obesity through evidence-based *PSE* change initiatives in States and communities. SNAP-Ed providers could potentially collaborate and partner with CDC grant awardees on nutrition and physical activity initiatives. Additional information about funding programs from CDC Division of Nutrition, Physical Activity, and Obesity Prevention is available at State and Local Programs.

3.4.1.h. Title V MCH Services Block Grant to the States program

FNS recommends that *State agencies* explore ways to collaborate with the Health Resources and Services Administration's (HRSA) Title V Maternal and Child Health (MCH) Services Block Grant. Title V supports improving maternal and child health. Title V–supported programs provide MCH services at three levels—direct services, enabling services, and public health services and systems. States have discretion in determining how to best invest their Federal Title V funds to most effectively complement State-supported efforts in addressing the unique needs of each State's MCH population. Two Title V performance measures focus on breastfeeding and physical activity. Utilizing evidence-based or evidence-informed *strategies*, 42 States are addressing breastfeeding in the current 5-year cycle (2021–2025), while 20 States are working on ways to improve physical activity among children and adolescents. Other States have State-defined performance measures related to nutrition. **New:** HRSA has shared that for the next 5-year cycle, States will select a new performance measure on food sufficiency to address issues of nutrition security among children. **End of new material.** SNAP-Ed providers may potentially partner with State Title V programs on these nutrition and physical activity initiatives and participate in the 5-year needs assessment that states are currently conducting. See Title V Maternal and Child Health (MCH) Block Grant for additional information from HRSA about the program, including State annual reports.

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3.4.1.i. MCH Nutrition Training Program

FNS recommends that *State agencies* explore opportunities for collaboration and technical assistance opportunities with HRSA's MCH Nutrition Training Programs. The MCH Nutrition Training Program establishes nutrition centers of excellence to train future and current MCH nutrition professionals and improve access to comprehensive, community-based, nutrition-centered, coordinated care. The program provides interdisciplinary graduate education and training with a public health focus and provides continuing education and technical assistance to local, State, and national organizations while working in collaboration with State Title V and other MCH programs. The program builds workforce capacity by translating science into practice, and policy into implementation strategies that impact MCH population health outcomes. Contact a funded project for more information at MCH Nutrition Training Program.

3.4.2. Collective Impact

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

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

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

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

- A common agenda
- Shared measurement systems
- Mutually reinforcing activities
- Continuous communication
- Backbone support organizations

To learn more about collective impact, visit the Collective Impact website.

3.5. Financial and Cost Policy

This section describes policies as required by Section 28 of the Food and Nutrition Act of 2008, as amended. This section also describes the impact of these policies on various funding-related SNAP-Ed activities. Where applicable, changes have been made to comply with 2 CFR §200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

3.5.1. State Agency Financial and Cost Requirements

A *State agency* must submit a *SNAP-Ed Plan* should it decide to request grant funds to conduct SNAP-Ed *activities*. If a *State agency* does not submit an approvable Plan, FNS

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may reallocate the State's grant among other States with approved Plans. The *SNAP-Ed Plan* must include an operating budget for the *FY* with an estimate of the cost of operation for the plan year. The *State agency* must identify the uses of funding for State or local *projects*, *nonproject activities*, and other costs and show the funding will remain under its administrative control when coordinating *activities* with other organizations. The *State agency* must inform FNS by the end of the first quarter of each *FY* (December 31) of any portion of its prior year allocation that it cannot or does not plan to spend by the end of the *FY*.

3.5.2. Federal Financial Participation and Allocation of Grants

SNAP-Ed grants have the following characteristics:

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

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

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

FNS strongly encourages States to spend the entirety of their SNAP-Ed allocations and to spend prior year funding before beginning to spend current year funds. Per 7 CFR §272.2(d)(2)(x)(F), a *State agency* must notify FNS by the end of the first quarter of each *FY* (December 31) if it will not or cannot spend any portion of its prior year allocation, in which case FNS may recover the unobligated, unexpended funds. FNS may reallocate these funds to other participating *State agencies* that have approved *SNAP-Ed Plans* during that *FY* or the following *FY.* Funds surrendered by a State will be removed from its base 2009 allocation, which is used to determine the next *FY* funding allocation. The reallocated funds received by a State will be added to its base 2009 allocation for the next *FY* to determine allocation.

3.5.3. Fiscal Recordkeeping and Reporting Requirements

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

- 7 CFR §277.11l, SF-425, Federal Financial Report: This quarterly report captures the *State agency's* expenditures of Federal SNAP-Ed funds during the report quarter and the amount of obligations for SNAP-Ed costs that remain unliquidated at the end of the report quarter. This report is submitted quarterly, 30 days after the end of each quarter. An *Annual Report* is due 90 days following the end of the *FY*.

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- 7 CFR §272.2 (d)(2)(xi-xiii), Fiscal Recordkeeping, Reporting Requirements and SNAP-Ed *Annual Report*: Beginning with *FY* 2023 reporting, N-PEARS will streamline SNAP-Ed annual reporting in one report due January 31, 2024.The system will capture the number of SNAP-Ed participants, their demographic characteristics (such as ages, racial/ethnic identities, etc.), the types of SNAP-Ed services provided, *project* characteristics, partnerships developed, and *project* outcomes and expenditures for the prior year to determine whether SNAP-Ed goals were met.
- 7 CFR §272.2 (d)(2)(ix), Unobligated Funds Report: The State must inform FNS by December 31 how much of its prior year allocation, if any, it cannot or does not plan to obligate or expend for SNAP-Ed *activities* by the end of that *FY*.
- 7 CFR §272.1 (f), Record Retention: SNAP regulations require that all records be retained for 3 years from fiscal closure.

3.5.4. Allowable Costs

3.5.4.a. How can a State agency determine whether costs are allowable?

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

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

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

The most fundamental Federal cost principle is that a cost must be necessary and reasonable for the performance of the Federal program or program component to be reimbursable from Federal funds. A cost that supports an activity outside the scope of SNAP-Ed is unallowable, even if it otherwise conforms to the Federal cost principles. To be allowable, all costs charged to SNAP-Ed must be valid obligations of the State, local government, or other *subgrantee* and must support *activities* described in an approved *SNAP-Ed Plan*. The diversity of SNAP nutrition education and obesity prevention *activities* makes it impossible to compile a comprehensive listing of all allowable and unallowable costs. FNS will make all final judgments on what *activities* support the delivery of SNAP-Ed. As examples, such *activities* may include the following:

- Employing *State agency* staff, such as registered dietitians with public health training and experience or credentialed public health professionals, to plan, oversee, and/or monitor the use of SNAP-Ed funds and *nutrition education and obesity prevention services*
- Promoting and conducting physical activity *projects* and *interventions* with members of the SNAP-Ed population in conjunction with SNAP-Ed nutrition *interventions* or *activities*; see Section 3.5.6.a.i. Physical Activity
- Food-related gardening and related education for nutrition education and obesity prevention; see Section 3.5.6.a.ii. Gardening

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- Breastfeeding promotion activities conducted in collaboration with WIC; see Section 3.5.6.a.iv. Breastfeeding
- Collecting information for use in providing nutrition education and obesity prevention *activities* for the SNAP-Ed audience. Examples follow:
  - Simple measuring of height and weight by SNAP-Ed staff in determining body mass index to prepare for discussing the prevention or management of overweight and obesity. Measurement and communication of weight status should be done with careful consideration of the sensitive and personal nature of this information. Consider if this is truly necessary for the *effectiveness* of the *intervention* and what actions to take to prevent stigmatizing and alienating participants.
  - Administering dietary intake questionnaires on nutrition knowledge and behaviors
- Evaluating SNAP-Ed *projects* and *interventions* as described elsewhere in this Guidance.

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

- *Medical nutrition therapy*
- Providing SNAP-Ed services to persons not eligible for SNAP-Ed
- Clinical health assessments of *SNAP-Ed-eligible* individuals; such assessments include measurement of cholesterol, blood glucose, or iron levels

3.5.4.c What Federal cost principles apply to SNAP-Ed costs?

The Federal cost principles identify certain criteria that an *allowable cost* must satisfy. These criteria include the following.

3.5.4.c.i. 2 CFR §200.404, reasonable and necessary costs

A reasonable and necessary cost is one that, in nature and cost, is one a reasonable, prudent person would incur for that purpose. Factors to consider follow:

Reasonable costs

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

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Necessary costs

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

Areas that in general fall outside of FNS's "reasonable and necessary" criteria and would not be allowed. They include funding for infrastructure changes, such as purchasing *capital equipment* or building sidewalks. Organized efforts to influence elected officials or *lobbying* for legislative/policy changes are not considered reasonable or necessary for SNAP-Ed. Initiatives that include educating policymakers can be appropriate.

3.5.4.c.ii. 2 CFR §200.405, allocable costs

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

3.5.4.c.iii. 2 CFR §200 Appendix IV (4), prorating costs

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

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

States must show how prorated costs were calculated, fully describe the nature of such costs, and demonstrate the value of the proposed *activity* or cost to SNAP-Ed. Because

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activities that target general audiences are often not designed with the needs of the *SNAP-Ed-eligible audience* in mind, the State must justify how the *activity* is a good vehicle for reaching the SNAP-Ed audience and influencing their nutrition-related behaviors.

3.5.4.c.iv. Costs requiring prior approval in SNAP-Ed

Expenditures for capital equipment

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

Costs related to State SNAP-Ed Plan amendments

If a *State agency* makes changes to a *SNAP-Ed Plan*, the State must submit a Plan amendment for Federal approval prior to incurring the related expenses to ensure costs meet all criteria for allowability. If the scope of the priority goals and objectives in a Plan change, regardless of the impact on the planned expenditures, a State must submit a Plan amendment for FNS approval as required by 2 CFR §200.308(c)(1). See instructions regarding Plan amendments in Section 4.3. Guidelines for Developing the SNAP-Ed Plan.

3.5.4.d. Where are the Federal cost principles located?

Additional guidance can be found at the following sources.

3.5.4.d.i. OMB guidance

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

3.5.4.d.ii. USDA departmental regulations

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

3.5.4.d.iii. Program-specific guidance

- SNAP regulations at 7 CFR §277

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

3.5.4.e.i. Allowable administrative costs are operational costs of carrying out SNAP-Ed in accordance with the State's approved SNAP-Ed Plan

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

- *Salaries and benefits of personnel involved in SNAP-Ed and administrative support*. All staff wages, salaries, and benefits must be computed on a reasonable hourly basis commensurate with duties being performed, or the Federal minimum hourly wages established by the United States Department of Labor
  - The wages and salaries shall be commensurate to the task an individual is actually performing for SNAP-Ed, as opposed to reflecting other positions for which they are credentialed. For instance, if a doctor or physician is teaching a SNAP-Ed course as a Nutrition Classroom Educator, pay will be commensurate with the *activity* of nutrition education in a classroom rather than that of a physician.
  - Staff must record time as specified in this Guidance and the underlying regulations and OMB circulars. For more information, see Section 3.5.6.b.ii. Documentation of Staff Time and Effort.
- *Office equipment, supplies, postage, and duplication costs* that are necessary to carry out the *project's* objectives
- *Charges for travel necessary to fulfill the approved Plan.* The travel must conform to official State, local, or agency travel regulations. Allowable travel costs are subject to restrictions, such as prohibiting the charging of commercial airfare in excess of coach or its equivalent. For more information, see Section 3.5.6.b.iv. Cost of Travel and Conference Attendance.
- *Development and production of SNAP-Ed materials* when no other appropriate materials exist
- *Memberships, subscriptions, and professional activities.* Costs of institutional memberships in technical and professional organizations necessary to effectively implement an approved State *SNAP-Ed Plan* are allowable. Costs of individual memberships in such organizations for personnel that work in SNAP-Ed are not allowable. Professional registration or license fees paid by individuals are unallowable costs because the fees would be considered personal expenses, not institutional expenses
- *Lease or rental costs*
- *Maintenance and repair expenses*

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- *Indirect costs.* See Section 3.5.6.b.iii. Indirect Costs
- *NERI.* See Section 3.5.6.a.v. Nutrition Education Reinforcement Materials
- *Cost of using publicly owned building space*. Includes depreciation based on the building's original acquisition cost and such building-related costs as maintenance and utilities; must not include costs of maintenance and utilities directly if they are already charged as indirect costs

3.5.4.f. What administrative expenses are not allowable for SNAP-Ed?

3.5.4.f.i. Unallowable administrative expenses include the following:

- *Advertising and public relations*: Costs incurred to publicize the organization, as opposed to SNAP-Ed *activities*, are unallowable, except when incurred for SNAP-Ed *social marketing campaigns*, recruitment of staff, acquisition of material for the grant, or publishing the results or accomplishments of the grant
- *Alcoholic beverages*
- *Bad debts*: Includes losses represented by accounts or claims written off as uncollectible and related costs. The related costs associated with delinquent debts for which the State continues to pursue collection are allowable
- *Contingencies*: Contributions to an emergency reserve or similar provision for events whose likelihood or magnitude cannot be forecast with certainty. These are not insurance payments, which are allowable
- *Contributions and donations*: Usually these are political in nature
- *Entertainment*: Costs primarily for amusement or social activities. 2 CFR §200.438 states that entertainment costs are unallowable "except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency." One example of this could be meals as provided during SNAP-Ed staff training events (see Section 3.5.6.b.iv. Cost of Travel and Conference Attendance). Other related costs require a "reasonable judgment" based on program purpose and why/when the activity takes place
- *Fines and penalties*: Include fiscal penalties, damages, and other settlements resulting from failure to comply with Federal, State, Tribal, local, or foreign laws and regulations
- *General government costs*: Include costs of the Governor's Office, the State Legislature, the Judiciary, etc. While such costs are generally unallowable, some may be charged as direct costs to a Federal grant if they clearly benefit that grant. For example, if a person assigned to the Governor's Office devotes 100 percent of their time to SNAP-Ed, the cost of their compensation may be allowable. Each situation must be judged on its own merit
- Goods and services for private use
- *Indemnification*: Payments to third parties and other losses not covered by insurance
- *Lobbying*

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

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

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

3.5.4.g. Federal royalty rights

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

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

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

3.5.4.h. Partnering with healthcare organizations

3.5.4.h.i. Financial considerations

The allowability of this type of partnership for the delivery of SNAP-Ed depends on whether the organization is public or private. The organization's profit or nonprofit status is not relevant. Three areas should be considered carefully when initiating a new contract or managing an existing SNAP-Ed program that uses a healthcare organization:

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

3.5.4.h.ii. Potential partnerships with nonprofit hospitals

SNAP-Ed focuses exclusively on community-based, nonmedical primary prevention, while healthcare providers, hospitals, and insurance systems typically provide secondary and tertiary prevention. Secondary prevention focuses on individuals by lowering risk factors and treating disease, while tertiary prevention aims to help individuals mitigate the effects of existing disease and disability. In some States, SNAP-Ed has partnered successfully with federally qualified health centers, local health departments, free clinics, and other healthcare entities that serve SNAP-Ed audiences on primary prevention *projects* that include *direct education*, *social marketing*, and *PSE interventions*. *Medical nutrition therapy* is part of healthcare delivery and may not be provided by SNAP-Ed.

Increasingly, large health systems are focusing on primary prevention as a means of slowing the rise of healthcare costs and preventing readmissions. The Affordable Care Act (Section 9007) community health benefits provision links hospitals' tax-exempt status to the development of a triennial *needs assessment* and implementation strategy. This

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provision applies to not-for-profit hospitals that seek Federal tax-exempt status. As a result, FNS encourages States to seek opportunities to partner with these hospitals for their support of *SNAP-Ed Plans* and *activities*.

SNAP-Ed providers may identify opportunities for sustainable partnerships with these groups to identify and implement evidence-based *interventions* and evaluations for populations with low income. For example, hospitals' community benefit programs can cover costs of gardening *project* infrastructure and equipment or community meals beyond what is allowable for SNAP-Ed. Hospitals and clinics can become sites for summer meals or popup or mobile farmers markets for SNAP-Ed *PSE projects*. For more information on this process, States may refer to the CDC Community Health Improvement Navigator process and Requirements for 501I(3) Hospitals Under the Affordable Care Act.

3.5.4.i. Partnering with School Wellness Programs

The Child Nutrition and WIC Reauthorization Act of 2004 (Public Law108–265) required each LEA participating in the NSLP and/or the School Breakfast Program (SBP) to establish a local school wellness policy by school year 2006. Local school wellness programs are intended to empower local communities to work together to promote and reinforce healthy eating and lifestyle behaviors. SNAP-Ed helps contribute to community health and wellness goals by providing and supporting *nutrition education and obesity prevention services* within eligible schools and other eligible venues. These *activities* help students and their families with low incomes make healthy eating and physical activity-related decisions in accordance with the DGA and MyPlate. While SNAP-Ed may pay for *activities* directed to the *SNAP-Ed-eligible* audience, it is not within its scope to pay for local initiatives that are directed to the entire community. Such initiatives are the financial responsibility of the community.

The Local School Wellness Policy Implementation Under the HHFKA of 2010 Final Rule requires all LEAs participating in the NSLP and/or the SBP to meet expanded local school wellness policy requirements, establish the framework for the content of these policies, ensure stakeholder participation in the policy development, and require periodic assessment of compliance and reporting on the progress toward achieving wellness policy goals.[13] The rule also requires LEAs, as part of the local school wellness policy, to implement policies consistent with nutrition standards for both non-sold foods and beverages and for the marketing of foods and beverages on the school campus during the school day. LEAs are encouraged in the rule to include SNAP-Ed coordinators and educators among others on local school wellness policy committees. Many SNAP-Ed providers already provide nutrition education in classrooms and may be able to broaden the reach of a school's local school wellness activities through SNAP-Ed collaborative efforts with other publicly or privately funded national, State, and local nutrition education and health promotion initiatives and *interventions*. Working within school wellness policy committees affords opportunities for SNAP-Ed providers to expand the scope of the *activities* conducted in the school setting using *PSE* efforts.

SNAP-Ed providers may participate in—but not lead—school wellness committees. Leadership in developing, implementing, maintaining, and enforcing the local wellness policy remains the responsibility of the LEA. SNAP-Ed providers may offer consultation

[13] Local School Wellness Policy Implementation Under the HHFKA of 2010 Final Rule, July 29, 2016

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on *strategies* that will help schools become community nutrition and wellness hubs. Examples of other school wellness policy committee activities for which SNAP-Ed providers may contribute expertise and/or funds to assist in:

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

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

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

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

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

3.5.5. More Examples of Allowable and Unallowable Costs

3.5.5.a. Literature/materials/audiovisuals

3.5.5.a.i. Allowable

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

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other FNS programs on the messages conveyed in SNAP-Ed materials and in sharing the production costs

3.5.5.a.ii. Unallowable

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

3.5.5.b. Social marketing programs

3.5.5.b.i. Allowable

- Electronic, outdoor, indoor, transit, and print announcements that include nutrition education and obesity prevention-related messages for the *SNAP-Ed-eligible* audience
- Social and multimedia initiatives that are part of comprehensive *interventions*
- Appropriate *social marketing* programs in which messages are delivered in areas or venues or use communication channels where at least 50 percent of the audience is eligible for SNAP-Ed
- Social media, websites, and other digital content designed for, tailored to, and predominantly promoted to the *SNAP-Ed-eligible* audience
- Television and radio announcements/advertisements that promote healthy eating and active living and do not include information about SNAP, its benefits, or how to apply

3.5.5.b.ii. Unallowable

- *Social marketing* that targets the general population. In some instances, prorated costs based on the number of the *SNAP-Ed-eligible* audience that will be reached with the campaign may be allowed. FNS may consider alternate methods with justification
- Publication or dissemination of nutrition education and obesity prevention messages that are inconsistent with the current DGA and MyPlate
- Television and radio announcements/advertisements that do not promote healthy eating and active living and contain information about SNAP, its benefits, and/or how to apply

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3.5.5.c. Equipment

3.5.5.c.i. Allowable

- Purchase of office equipment
- Equipment shared with non-SNAP-Ed users when costs are shared with those users or equipment used by non-SNAP users when not needed for SNAP-Ed purposes as long as such use is incidental
- Kitchen appliances, only with justification of need
- Cell phones purchased for staff who work predominantly in the field or away from a desk location with a land line when the FNS Regional Office has given prior approval
- Tablets purchased for program delivery purposes, such as delivering nutrition education or collecting data for evaluation, when the FNS Regional Office has given prior approval
- A one-time purchase of a Wi-Fi hotspot to support tablet function, when the FNS Regional Office has given prior approval

3.5.5.c.ii. Unallowable

- Expenditures for equipment that exceed prior approval thresholds (i.e., $5,000 per unit) unless prior approval is received from FNS
- Medical equipment except for inexpensive equipment such as anthropometric measuring tools that can be used to measure height and weight to determine and discuss body mass index and calorie balance/physical activity
- Purchases of cell phones and tablets without prior approval from FNS Regional Office
- Purchases of tablets for purposes without prior approval from FNS Regional Office or for use other than program delivery or data collection for evaluation

3.5.5.d. Food samples, supplies, and provisions

3.5.5.d.i. Allowable

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

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

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3.5.5.d.ii. Unallowable

- Ongoing snack or food service
- Meal-sized portions or complete meal service
- Cost of food provided as groceries or supplemental food

3.5.5.e. Nutrition education and obesity prevention

3.5.5.e.i. Allowable

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

3.5.5.e.ii. Unallowable

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

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- Gym memberships, trainers, gym equipment, or facilities
- Clinical health screening (e.g., cholesterol testing, blood glucose testing)
- **New:** Nutrition education and physical activity reinforcement items costing over $7 each **End of new material.**
- Nutrition education costs charged to another Federal program such as WIC, *EFNEP*, or Head Start
- Breastfeeding education, promotion, and support that duplicate or is provided through WIC, *EFNEP*, or Head Start funding
- Education provided to incarcerated or institutionalized persons who are not eligible for SNAP
- SNAP-Ed *activities* delivered to most able-bodied students, aged 18–49, enrolled in college or other institutions of higher education at least half time. For information on students who may be eligible, visit the SNAP web page for students

3.5.5.f. Space allocation

3.5.5.f.i. Allowable

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

3.5.5.f.ii. Unallowable

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

3.5.5.g. Staff and training costs

3.5.5.g.i. Allowable

- SNAP-Ed-related training for program delivery staff
- Nutrition-specific mental and/or emotional health training for SNAP-Ed staff that directly applies to a SNAP-Ed *project* or *intervention*
- Staff time spent delivering nutrition education and obesity prevention *activities* to the *SNAP-Ed-eligible* audience. Time must be charged at a rate commensurate with the duties being performed
- General briefings to community healthcare providers serving communities with low income about food insecurity assessments and SNAP-Ed *activities* in the community
- Compensation for *State agency* staff to plan, oversee, and/or monitor the use of SNAP-Ed funds

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- Training for *State agency* staff on SNAP-Ed programs and services, so they can enhance notification of SNAP-Ed availability to participants and *applicants*
- Orientation of school, child care, or appropriate worksite food service staff on collaborative *PSE* change efforts

3.5.5.g.ii. Unallowable

- The time volunteers of a nonpublic agency (e.g., faith-based organizations, many *food banks)* spend performing SNAP-Ed specific duties
- A physician's or other professional's time spent conducting SNAP-Ed *activities* when charges are based on a rate commensurate with their credentials as opposed to the duties they are performing
- University courses not relevant to the practical delivery of SNAP-Ed to the *SNAP-Ed-eligible* population
- Training or development costs of food service workers or others not directly associated with delivery of SNAP-Ed

3.5.5.h. PSEs

3.5.5.h.i. Allowable

- Costs associated with the adoption, implementation, and maintenance of *PSE* efforts within the scope of SNAP-Ed
- Consultation with partner organizations on promoting organizational policy and practice changes that support healthy food and beverages, physical activity, and reduced sedentary behavior
- Analyzing and preparing data reports and sharing information on the expected benefits of *PSE* changes
- Consultation and training with food retailers, farmers, food distributors, and farmers market managers on increasing access to and promotion of whole grains, fruits and vegetables, and low-fat dairy
- Conducting environmental scans or assessments of the food and activity environments where food and activity decisions and choices are made
- Community forums or meetings with *SNAP-Ed-eligible* populations or service providers on healthy eating and active living
- Point-of-purchase or point-of-decision signage and other behavioral cues to action that promote healthy eating or physical activity choices
- Resource kits with *strategies* for adopting, implementing, maintaining, and evaluating *PSE* changes
- Consultation with partner organizations on measures to address and reduce food waste and enhance use and consumption of available healthy food resources

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3.5.5.h.ii. Unallowable

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

3.5.5.i. Costs associated with other activities

3.5.5.i.i. Allowable

- *Interventions* that promote the selection of healthy foods from vending machines
- Participation in relevant nutrition education and obesity prevention-related State and local advisory panels focusing on the interests of the *SNAP-Ed-eligible* audience
- Reimbursement for personal costs such as child care, meals, lodging, and transportation for recipients of SNAP-Ed to actively participate in focus groups, *needs assessment*, and advisory groups to inform and improve SNAP-Ed *effectiveness*. *Allowable costs* for focus group participants are intended to reimburse for incurred costs, not to provide a financial incentive for participation
  - If reimbursement is given in the form of a gift card, it is recommended the reimbursing organization issue gift cards restricted from alcohol, tobacco, and gambling purchases
  - **New:** In lieu of reimbursement for incurred costs and as consistent with State and local policies, financial compensation may be provided for the aforementioned activities. See justification requirements for financial compensation in Section 3.5.6.a.vi. Participant Compensation. **End of new material**

3.5.5.i.ii. Unallowable

- Organized efforts to influence elected officials and *lobbying* for legislative/policy changes
- Costs associated with surveillance or surveys of the general population that are not prorated based on the number of the likely SNAP-Ed population

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- Money, vouchers, or passes provided to SNAP-Ed participants to offset personal costs (e.g., child care, transportation expenses) incurred so they may attend SNAP-Ed classes
- Child care or transportation services provided for SNAP-Ed participants in conjunction with SNAP-Ed *activities*

3.5.6. Financial and Cost Policy Supplement

3.5.6.a. Costs associated with program efforts

3.5.6.a.i. Physical activity

The 2018 Physical Activity Guidelines for Americans provides guidance to help Americans improve their health through appropriate physical activities. FNS encourages States to include the related *2020–2025 DGA* key recommendation, to meet the PAG for Americans in the *SNAP-Ed Plans*. Efforts to improve the health and fitness of program participants could include the following:

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

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

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

Basic principles of SNAP-Ed policy on physical activity

- Educational and program materials developed to promote and reinforce physical activity for all *SNAP-Ed-eligible* audiences should include messages that link nutrition and physical activity and explain the associated health benefits of active lifestyles
- All programming such as workshops, conferences, and trainings for SNAP-Ed that encourages physical activity should also include promotion of healthy eating patterns. *Activities* may include physical activity demonstration for the SNAP-Ed audience and training for staff to develop skills to help SNAP-Ed participants

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- FNS program *State* and *implementing agencies* may use nutrition education funds to develop nutrition education and physical activity material that is reasonable and necessary for SNAP-Ed purposes. Physical activity materials should include a nutrition education message that promotes healthy eating and links nutrition with physical activity. FNS encourages the use of existing materials, especially existing FNS and CNPP materials, and those available through the SNAP-Ed Connection, CDC, and other Federal Government agencies. Using or adapting successful *interventions* developed by others is preferable to developing new materials.
- FNS program *State* and *implementing agencies* are encouraged to coordinate with community, faith-based, youth, recreational, and other organizations whose primary mission is to make regular opportunities for physical activity accessible and actively promote and coordinate such *activities*.
- FNS encourages *PSE interventions* that promote and support physical activity.

Examples of unallowable costs beyond the scope for SNAP-Ed physical activity education and promotion include:

- Health club, gym, or fitness class membership fees
- **New:** Large expenditure equipment (e.g., bicycles (including smoothie or blender bicycles), treadmills, ellipticals, weight sets) **End of new material.**
- Facilities (rental or modifications)
- Instructors for continuing exercise classes

Examples of acceptable physical activity education and promotion costs

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

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

CDC's Division of Nutrition, Physical Activity, and Obesity Physical Activity web page provides a range of resources.

3.5.6.a.ii. Gardening

Food-based gardening is a beneficial *activity* that leads to the economical production and consumption of healthy and fresh food. Gardening *projects* funded by SNAP-Ed funded gardening projects are intended to reinforce nutrition education in schools and communities eligible for SNAP-Ed. They are not meant to create gardens whose primary purpose is to donate food into the emergency food system.

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New: The following garden related costs are *allowable costs* for SNAP-Ed:

- Educational supplies, curricula, and staff salaries to teach food gardening concepts that reinforce the beneficial nutrition and physical activity aspects of food gardening
- Purchase of seeds, edible plants, small gardening tools, and supplies such as fertilizer and potting soil to assist in developing school and community food gardening *projects*
- Staff salaries to establish and implement a plan to build community capacity to maintain food gardens, such as in schools, or government-subsidized or public housing locations

The following garden related costs are not *allowable costs* for SNAP-Ed:

- The rental or purchase of garden equipment (tractors, rototiller, cultivator, etc.)
- The rental or purchase of land for garden plots
- Non-edible plants, including non-edible pollinator plants
- Permanent fixtures, such as a greenhouse

Appropriate justification for garden related costs should include a description of why the cost is necessary and reasonable for the primary purpose of SNAP-Ed, which is to reinforce nutrition education in *SNAP-Ed-eligible* communities. States may consult with their FNS SNAP-Ed Regional Coordinator on other gardening related costs that may be allowable. **End of new material.** Gardening related costs should be incurred in partnership with other funding mechanisms to ensure sustainability of the *project*. Provision of time for food garden maintenance is an example of an opportunity for community participation in addition to SNAP-Ed funding. Participants may use program benefits to purchase seeds and plants for individual food gardening purposes.

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

It is a requirement that all SNAP-Ed garden *activities* include nutrition education at the gardening site. This can include *indirect education channels*, but *direct education* at the gardening site is recommended. For sites where this is logistically not feasible, and/or in sites not located in communities with low income, where produce is being distributed at a partner site serving *SNAP-Ed-eligible* individuals and families, nutrition education must be provided at the point of distribution. Nutrition education should be related to the produce being distributed from the garden, and inclusion of information about gardening and health is recommended.

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

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

3.5.6.a.iii. Farmers markets

Farmers markets offer multiple opportunities to partner with SNAP-Ed providers. States have the flexibility to implement PSE change efforts using multilevel interventions for SNAP-Ed services at farmers markets. Examples follow:

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

SNAP-Ed funds may not be used to provide the cash value of financial incentives or the cost of EBT equipment, but SNAP-Ed funds can be used to engage farmers markets and retail outlets to collaborate with other groups and partner with them.

3.5.6.a.iv. Breastfeeding

All SNAP-Ed *activities* that address the topic of breastfeeding must be planned and implemented in collaboration with the State and local WIC agencies including State Breastfeeding Coordinators and Local Peer Counselors. WIC should have the lead and primary role in all breastfeeding *activities* with SNAP-Ed supplementing existing WIC activities. A written agreement such as an Interagency Agreement or MOU stating the degree of collaboration and the specific responsibilities of WIC (i.e., staff, duties, and time) and SNAP-Ed shall be signed by all collaborating agencies and maintained for inspection. SNAP-Ed can advance breastfeeding in its programming through such *activities* as working on breastfeeding policies and promotion at low-wage worksites, child care facilities, or other community venues.

More information about breastfeeding promotion is available at The Surgeon General's Call to Action to Support Breastfeeding web page, the WIC Breastfeeding Support website, and CDC's Breastfeeding page. Other FNS WIC Guidance document resources that speak to breastfeeding promotion and support in WIC are Breastfeeding Policy and Guidance and the WIC Nutrition Services Standards.

3.5.6.a.v. Nutrition education reinforcement materials

Nutrition education reinforcement materials refer to products given to the SNAP-Ed audience or those closely associated with SNAP-Ed and meant to reinforce the objectives of the education provided to the participants. These items must have a direct relationship to the desired nutrition or physical activity behavior change and are not

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meant to be provided just as an incentive. Terms used to describe these items include enhancement items, home reinforcements, and educational extenders. Such items are *allowable costs* only if they are reasonable and necessary, contain or reinforce nutrition and physical activity messages, and are of nominal value.

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

- Have a clear, relevant, and useful connection to particular FNS/SNAP nutrition education or obesity prevention messages
- Contain a nutrition education or physical activity message or have a use directly relevant to reinforce behaviors among the *SNAP-Ed-eligible* audience
- Have value as nutrition education and obesity prevention aids—for example, measuring cups to determine portion size or pedometers to track physical activities
- Be offered only after weighing and assessing other relative needs and cost-effectiveness
- **New:** Be of nominal value of $7 or less per item **End of new material.**
- Not be used solely for marketing or staff morale boosters

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

- Celebratory items and items designed primarily as staff morale boosters
- Items that are not reasonable or necessary and/or have no nutrition education message. **New:** T-shirts, uniforms and other apparel for SNAP-Ed participants or staff are not considered allowable NERI, except for purposes of food safety. **End of new material.**
- Any program reinforcement item intended for persons who are not eligible for SNAP-Ed
- Knives are not considered acceptable NERI items. Knives should be used only for recipe preparation for food demonstrations or *direct education* classes.

New: ***3.5.6.a.vi. Participant compensation***

FNS encourages SNAP-Ed agencies to include *SNAP-Ed-eligible* community members in SNAP-Ed focus groups, needs assessments, and advisory groups. FNS respects and values the lived experiences, contributions, and community expertise that the *SNAP-Ed-eligible* audience may provide to inform and improve SNAP-Ed programming and *effectiveness.* Providing financial compensation may reduce barriers to participation and enhance collaboration and trust with the SNAP-Ed-eligible audience. Therefore, SNAP-Ed funds may be used to provide financial compensation to participants for their time and involvement in these and similar program planning and evaluation activities. **Any compensation amount provided to participants in connection with these activities, including participants**

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holding an advisory board position, cannot in any way be based on or justified as a substitution for salary. The type of compensation (e.g., stipends) may vary by State or local agency; however, the amount must be reasonable, incurred within the *period of performance*, and adequately supported by accounting records. **States must obtain preapproval of participant compensation from FNS.** Documentation of payments for approved financial compensation activities must be maintained by the State and available for FNS review and audit.

Agencies must consult their SNAP State Agency to ensure they follow State specific policies and guidelines. States should determine if payments to participants would be considered household income for determining SNAP eligibility or monthly benefit amounts. Regulations at 7 CFR §273.9(b) outline the definition of income for SNAP purposes. Regulations at 7 CFR §273.9(c) outline instances where payments may be excluded as income.

Another compensation option available to States are *participant support costs*. As stated in 2 CFR §200.1, *participant support costs* are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (not employees) in connection with conferences, or training projects. An example related to SNAP-Ed, could be using SNAP-Ed funds to pay the conference fees of a participant to present on their involvement or partnership in a SNAP-Ed-related activity. These payments may be provided as allowable by State and local policies and are also subject to regulations at 7 CFR §273.9(b) and (c).

Prior to issuing any compensation to participants, agencies must inform participants in writing, of the compensation amount and that accepting compensation may affect the participants' eligibility status or benefit level for SNAP and other means-tested assistance programs. Participants must also be informed that they should verify any income reporting requirements with State and IRS policies.

The justification for financial compensation in the State plan, should include the following:

- Description of the activity;
- Information on participants' roles and responsibilities in the activity;
- Proposed compensation amount and reasoning for the amount;
- Estimated number of participants; and
- Documentation showing how participants will be notified of possible impact to benefits.

As a reminder, SNAP-Ed funds may not be used to provide any form of incentive to participants for participating in SNAP-Ed program activities such as attending a *direct education* class, completing a survey as part of a *direct education* intervention, or to support implemented *PSE* changes and *social marketing.*

End of new material.

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3.5.6.b. Administrative efforts

3.5.6.b.i. College and university student scholarships and tuition

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

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

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

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

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

3.5.6.b.ii. Documentation of staff time and effort

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

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

Standards for documenting staff time also come from 2 CFR §200.430(i), which is excerpted below.

Standards for Documentation of Personnel Expenses

- Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:
  - Be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
  - Be incorporated into the official records of the non-Federal entity;
  - Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100 percent of compensated activities (for Institute of Higher Education {IHE}, this per the IHE's definition of Institutional Base Salary {IBS});
  - Encompass both Federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
  - Comply with the established accounting policies and practices of the non-Federal entity (see paragraph (h)(1)(ii) above for treatment of incidental work for IHEs); and
  - Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.
  - Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:
    - The system for establishing the estimates produces reasonable approximations of the activity actually performed;
    - Significant changes in the corresponding work activity (as defined by the non-Federal entity's written policies) are identified and entered into the records in a timely manner. Short-term (such as 1 or 2 months) fluctuation between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term; and
    - The non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal award based on budget estimates. All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.
  - Because practices vary as to the activity constituting a full workload (for IHEs, IBS), records may reflect categories of activities expressed as a percentage distribution of total activities.

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

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

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

3.5.6.b.iii. Indirect costs

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

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

FNS has determined that under the Uniform Guidance, the primary *grantee* (normally the *State agency*) is responsible for review of indirect costs submitted by their *subgrantees*. This policy is currently implemented by other Federal agencies, including the Departments of Education, Labor, and Health and Human Services.

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

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

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

FNS will accept *indirect cost rates* for colleges and universities that have been approved by the appropriate cognizant entity. Unless justification is provided, only the off-campus rates may be used. If additional categories such as "other sponsored activities" are covered, FNS will not accept "instructional rates" without justification. In most *SNAP-Ed Plans*, only one rate may be used for SNAP-Ed. As a result, any justification for using either the "on-campus" or "off-campus" rate should be based on where the majority of the allowable *activities* take place. In the case of SNAP-Ed, the allowable *activities* are defined as those *activities* that provide nutrition education to the *SNAP-Ed-eligible* population. Other activities, such as research and data analysis, are not the primary purpose of SNAP-Ed and should not be used in determining where the majority of the *activities* take place. Indirect costs at colleges and universities may be limited to 26 percent of Modified Total Direct Costs, based on 2 CFR §200 Appendix III.

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

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

3.5.6.b.iv. Cost of travel and conference attendance

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

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

Travel destination

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

Travel purpose and justification

- Justify the purpose of the travel request.
- Describe how attendance is necessary to achieve SNAP-Ed program goals and objectives and how the travel request supports the State's SNAP-Ed goals and objectives.
- Demonstrate how information will be disseminated to in-State educators, collaborators, and SNAP office staff.
- Identify the number of staff attending.
- Identify and justify the number and type of staff making the travel request.
  - For attendance at national-level conferences, the request should be limited to no more than four staff persons per State. When travel to a national conference is similar in cost to local travel because of locality, States may submit a request to their respective Regional Office for consideration of limited attendance beyond four staff.
  - For attendance at regional conferences or meetings (e.g., FNS regional meetings), with attendance invitations limited to a specific area, no more than six staff persons are allowed per State.
  - For attendance at State or local conferences or meetings with attendees limited to persons working within State borders (such as SNAC meetings), no more than eight staff persons are allowed per State. This limit is not imposed on meetings conducted for SNAP-Ed training purposes.
  - For attendance at any conference held virtually or remotely, additional flexibilities may apply around the maximum number of allowable attendees. Contact your Regional Office if you require specific flexibilities for attending virtual conferences.
  - If the attendance guidance provided above does not enable you to meet the needs of your SNAP-Ed *activities*, contact your Regional Office to determine whether an alternative number of attendees is allowable.

Per diem rates

The standard State or Federal per diem rates shall be applied. All travel restrictions found in the OMB regulations (e.g., no per diem for travel status less than 12 hours, no first-class tickets) shall be followed. If meals are provided to minimize cost and time lost to local travel for meals, costs must be reasonable, and per diem must be reduced for meals provided in accordance with OMB regulations. Additional detail can be found at the CFR website.

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3.6. Guidance for Nutrition Education Materials

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

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

New: FNS encourages *State agencies* to submit their materials to the SNAP-Ed Connection for consideration and inclusion in the SNAP-Ed Library. Resources such as State impact reports, staff training materials, and success stories may be submitted at any time. Educational materials such as interventions and curricula may only be submitted during FNS's open intervention submission period. Details on these submission processes can be found in the SNAP-Ed Library. **End of new material.**

FNS reserves a royalty-free, nonexclusive right to reproduce, publish, use, or authorize others to use photographs, videos, recordings, computer programs and related source code, literature, or other products produced, in whole or in part, with SNAP funds for Government purposes. For more information, see Section 3.5.4.g. Federal Royalty Rights.

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

3.6.1. Guidelines for Duplicating or Editing SNAP-Ed Materials

New: If materials developed by USDA or FNS will be reproduced as is, nothing needs to be done.

When any changes or additions are made to the content, design, and/or language of USDA or FNS developed materials, and/or if the name or logo of an organization or company is added to the material, the SNAP and USDA logos must be removed. The following statement must be added in the appropriate language:

> "Adapted from U.S. Department of Agriculture, Supplemental Nutrition Assistance Program. USDA does not endorse any products, services, or organizations. Provided by (organization's name)." **End of new material.**

3.6.2. Guidelines for Use of the USDA and SNAP Logos

New: USDA symbols or logos are intended for the official use of the USDA. Therefore, they should not be used by anyone outside of USDA without permission.

Use of the SNAP logo must follow requirements as stated in the Supplemental Nutrition Assistance Program (SNAP) Using the SNAP Logo guide. The SNAP logo may not be altered or manipulated. USDA does not endorse goods, services, or enterprises. SNAP-Ed agencies using the SNAP logo must not use the SNAP logo in any way that might suggest USDA endorsement of the organization or its goods and services. Materials with the SNAP logo must include the statement:

"The SNAP logo is a service mark of the U.S. Department of Agriculture. USDA does not endorse any goods, services, or enterprises."

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Agencies should contact SNAPLogo@usda.gov for questions regarding usage or to request a certain file format. **End of new material.**

3.6.3. Nondiscrimination Statement Use

The nondiscrimination statement lists all of the prohibited bases for discrimination contained in the USDA Civil Rights Policy Statement. Both print (e.g., brochures, newsletters, education curricula) and nonprint (e.g., audio, videos, websites) forms of communication should have the nondiscrimination statement. Documents developed, adapted, or reprinted by *State* and *implementing agencies* using SNAP-Ed funds must have the following shortened nondiscrimination statement when used specifically for SNAP-Ed: **"This institution is an equal opportunity provider."** In general, anything that features USDA logos, such as MyPlate, or communicates SNAP-Ed programming information, including times, dates, and locations as well as objectives and outcomes of classes or activities, falls into this category. Moreover, all communication must comply with Section 508 (meet accessibility standards) and all applicable civil rights laws, regulations, Executive Orders, and policies (see Accessibility Training, Tools, and Events for relevant information).

The full nondiscrimination statement provided at Section 3.6.3.b. Full nondiscrimination statement is rarely, if ever, required for SNAP-Ed. It is necessary if SNAP or other FNS program eligibility or application information is provided. All newly printed documents, pamphlets, websites, etc., that require the full nondiscrimination statement must use the updated FY 2022 version. **New:** For SNAP-Ed funded websites, the nondiscrimination statement should be included, even if program eligibility or application information is not provided. FNS advises agencies to provide the full nondiscrimination statement or include a link to the appropriate version in the footer of the site. If a link to the nondiscrimination statement is included, it is suggested to label the link as "Nondiscrimination Statement" or "This institution is an equal opportunity provider" (the short version of the statement). **End of new material.**

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

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

Please refer to the Nondiscrimination Statement web page for more information on translated statements.

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

SNAP-Ed *State* and *Implementing Agencies* are required to notify *applicants* and participants with disabilities and/or limited English proficiency (LEP) of the availability of free language assistance and accommodations upon request.

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

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

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

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

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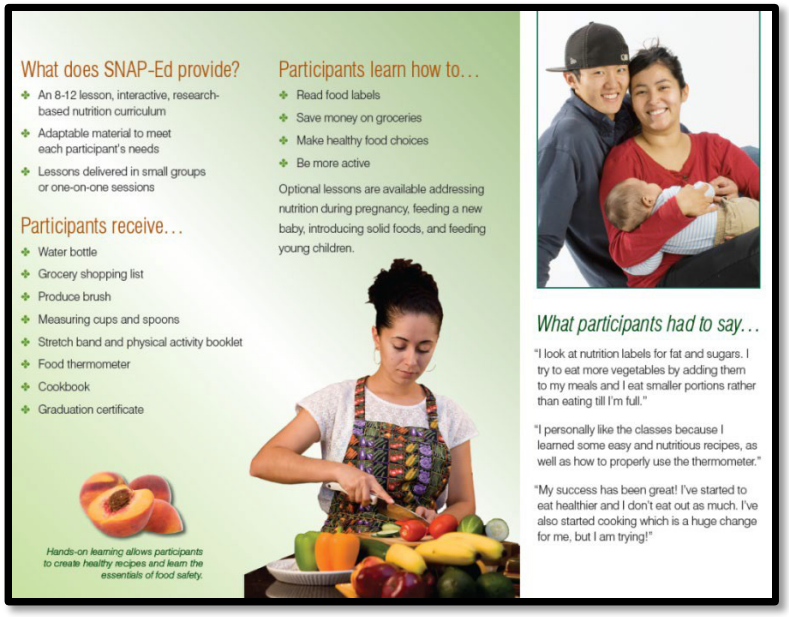
3.6.3.a. Example documents

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



What does SNAP-Ed provide?

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

Participants receive…

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

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

Participants learn how to…

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

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

What participants had to say…

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

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

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

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

Farmer's Market Stir-Fry [1]

Serves: 8
Ingredients:

2 cups cooked brown rice

vegetable oil cooking spray

3 gloves garlic or $^1/_2$ teaspoon garlic powder

1 teaspoon fresh ginger or $^1/_2$ teaspoon ground ginger

1 cup onion, diced

1 cup broccoli, cut into bite-sized pieces

1 cup carrots, sliced

1 cup cabbage, chopped

1 cup cauliflower, cut into bite-sized pieces

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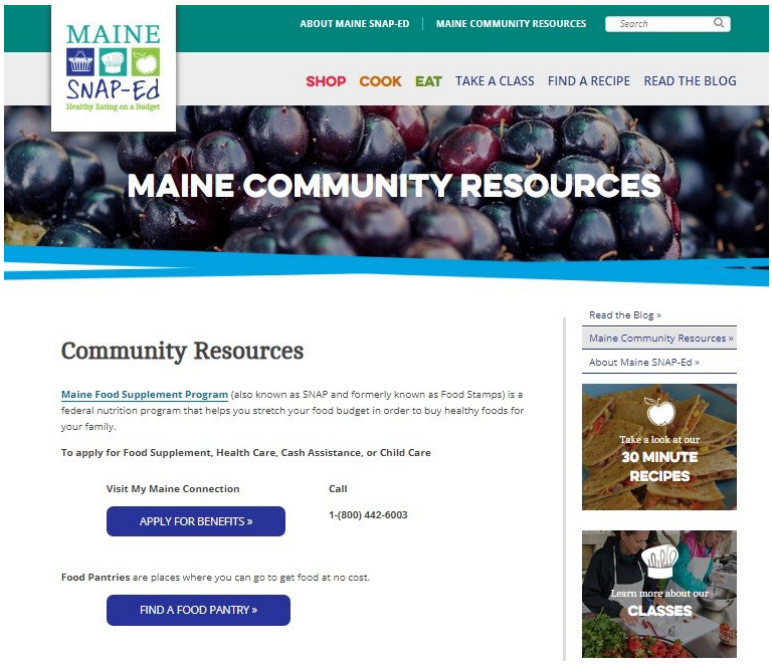
Example 3: The web page pictured below includes a link to application forms for SNAP benefits; therefore, it requires the full USDA nondiscrimination statement. The link to the appropriate statement can be placed in the footer.



Source: Maine SNAP-Ed Community Resources, https://www.mainesnap-ed.org/community-resources/

Example 4: The website pictured below does not link to or feature SNAP benefit information or applications. **New:** However, since it is a SNAP-Ed funded website, it should include the full nondiscrimination statement or a link to the full statement. **End of new material.**

Source: Live Well Alabama, Alabama Cooperative Extension, https://www.aces.edu/blog/category/home-family/nutrition/live-well-alabama/

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

3.6.3.b. Full nondiscrimination statement

3.6.3.b.i. English

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language) 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.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (833) 620-1071, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to:

- **mail:** Food and Nutrition Service, USDA 1320 Braddock Place, Room 334 Alexandria, VA 22314; or
- **fax:** (833) 256-1665 or (202) 690-7442; or
- **email:** FNSCIVILRIGHTSCOMPLAINTS@usda.gov

This institution is an equal opportunity provider.

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

3.6.3.b.ii. Spanish

De acuerdo con la ley federal de derechos civiles y las normas y políticas de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta entidad está prohibida de discriminar por motivos de raza, color, origen nacional, sexo (incluyendo identidad de género y orientación sexual), credo religioso, discapacidad, edad, creencias políticas, o represalia o retorsión por actividades previas de derechos civiles.

La información sobre el programa puede estar disponible en otros idiomas que no sean el inglés. Personas con discapacidad que requieran medios alternos de comunicación para obtener información sobre el programa (por ejemplo, Braille, letra grande, cinta de audio, lenguaje de señas americano), debe ponerse en contacto con la agencia (estatal o local) donde solicitaron los beneficios. Las personas sordas, con dificultades auditivas o con discapacidades del habla pueden comunicarse con el USDA a través del Servicio Federal de Retransmisión al (800) 877- 8339.

Para presentar una queja por discriminación en el programa, el reclamante debe llenar un formulario AD-3027, formulario de queja por discriminación en el programa del USDA que puede obtenerse en línea en: https://www.usda.gov/sites/default/files/documents/ad-3027s.pdf, en cualquier oficina del USDA, llamando al (833) 620-1071, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre del demandante, la dirección, el número de teléfono y una descripción escrita de la acción discriminatoria alegada con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR) sobre la naturaleza y fecha de una presunta violación de derechos civiles. El formulario AD-3027 completado o la carta debe presentarse por:

- **correo:** Food and Nutrition Service, USDA 1320 Braddock Place, Room 334 Alexandria, VA 22314; o
- **fax:** (833)-256-1665, o (202) 690-7442; o
- **correo electrónico:** FNSCIVILRIGHTSCOMPLAINTS@usda.gov

Esta institución es un proveedor que ofrece igualdad de oportunidades.

3.6.3.b.iii. Edits and size requirements

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

3.6.4. Credit

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

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

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

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Section 4: Writing Your SNAP-Ed Plan and Annual Report

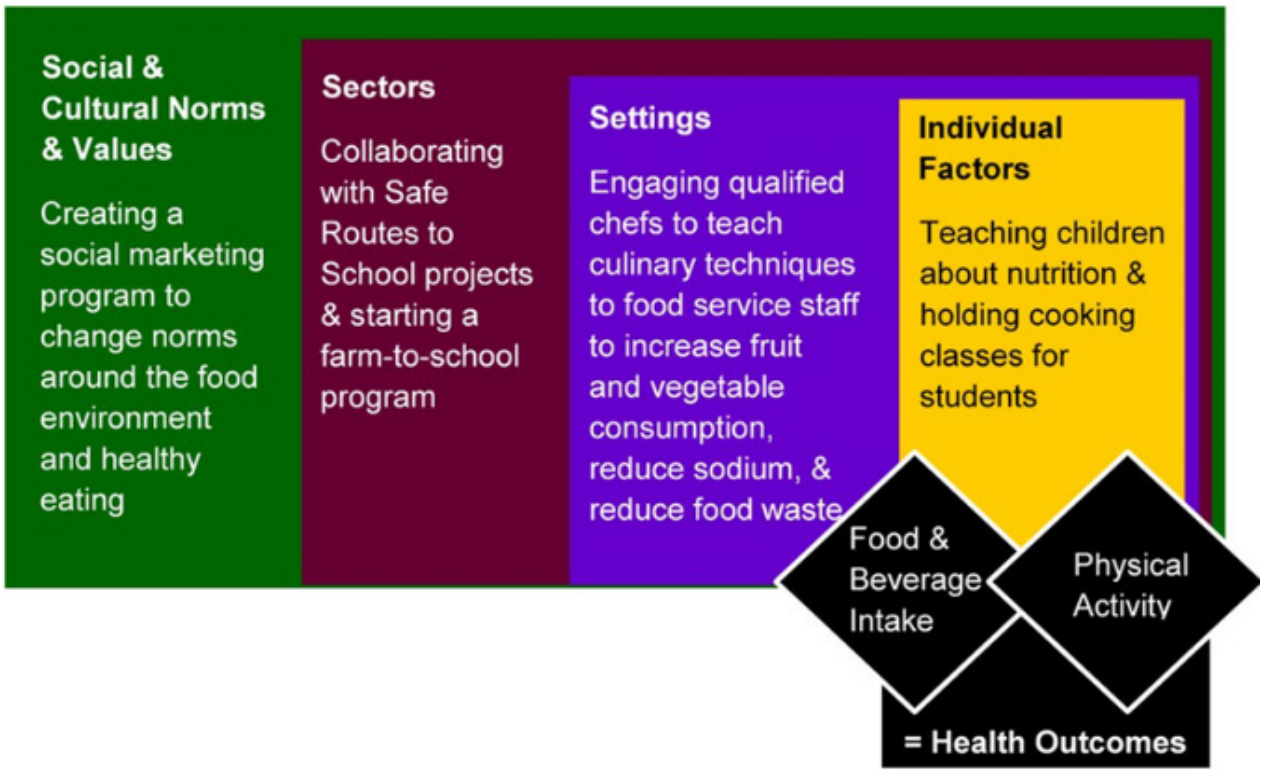
4.1. Comprehensive Projects and Plans

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

States have opportunities to include a vast array of *nutrition education and obesity prevention services* through interventions that are evidence-based and consistent with the three *SNAP-Ed Approaches.* SNAP-Ed *interventions* and *projects* must comply with the Section 3.5. Financial and Cost Policy, including policy on *allowable costs* and reasonable and necessary expenditures. For example, while building walking trails in a community with low income would promote physical activity for the *SNAP-Ed-eligible* audience, this activity would not be an *allowable cost* because capital expenditures are not permitted. Helping partner groups organize and plan walking trails may be an allowable SNAP-Ed expense. Promoting the walking trail and the benefits of physical activity to address weight management are SNAP-Ed *allowable costs* and in accordance with the SNAP-Ed goals and principles.

Employing multiple *SNAP-Ed Approaches* has been shown to be more effective than implementing any one approach. Figure 4 describes an example of implementing *activities* from all three *SNAP-Ed Approaches* through *direct education*, *social marketing,* and *PSE* change efforts in schools with a majority population eligible for SNAP-Ed.

Figure 4. Example of Implementing Activities from All Three SNAP-Ed Approaches



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

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

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

SNAP-Ed Plans and *Annual Reports* must be consistent with the mission and focus of FNS, key behavioral outcomes, and the coordination and collaboration policy detailed in the Section 3.4. Requirements for Coordination and Collaboration of the Guidance. *State agencies* are expected to—

Reminder: For State *SNAP-Ed Plan* and *Annual Report* requirements, please refer to Section 3.2.2. SNAP-Ed Plan Overview and Requirements and Section 3.2.3. SNAP-Ed Annual Report Overview and Requirements.

- Describe in their *SNAP-Ed Plan* the identified health-related nutrition and physical activity needs of the SNAP-Ed population in the State. The description must include clear, concise, and well-written target population health-related nutrition and physical activity goals and objectives for the State. SNAP-Ed Plan Modules 1 and 2 cover these requirements; see Sections 4.3.1. Plan Module 1: Target Audience and Needs Assessment and 4.3.2. Plan Module 2: SNAP-Ed Action Plan.
- Provide *project*-specific information as instructed in this Guidance, including information on how *projects* support State goals and objectives and descriptions of *project* implementation, staffing, and budget for each *project*. SNAP-Ed Plan Modules 3 and 6 cover this requirement; see Sections 4.3.3. Plan Module 3: Planned Projects and Activities and 4.3.6. Plan Module 6: Planned Staffing and Budget.
- Provide clear and concise descriptions and justifications for requested items. SNAP-Ed Plan Module 6 includes space to provide all required budget justifications; see Section 4.3.6. Plan Module 6: Planned Staffing and Budget.
- Complete a careful review of the Plan by the *State agency* program staff and fiscal officer to ensure the Plan is consistent with the current Guidance and budgetary information is accurate.
- Verify the State SNAP-Ed Nutrition Coordinator or State SNAP Director and a SNAP *State agency* fiscal reviewer have approved, signed, and dated the Plan. SNAP-Ed

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Plan Module 7 covers this requirement; see Section 4.3.7. Assurances and Signatures.

- Submit the Plan to the respective FNS Regional Office by August 15.
- Submit Plan amendments for the current year with new or significantly revised *activities* to the FNS Regional Office by May 1. See Section 4.2.3. Plan Amendments.
- Concisely describe the outcomes of *projects*, including evaluation findings where indicated.
- Submit the *SNAP-Ed Plan* and *Annual Report* through N-PEARS.
  - Submit the *SNAP-Ed* Plan by August 15.
  - Submit Plan amendments (see Section 4.2.3. Plan Amendments) for current year with new or significantly revised *activities* to the FNS Regional Office by May 1.
  - Submit the *Annual Report* to the FNS Regional Office by January 31 of the following *FY*.

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

4.2.1. Annual or Multiyear Plans

State agencies must conduct comprehensive *needs assessments* that cover a 3-year period and set State priority goals and objectives to correspond with the 3-year *needs assessment* cycle.

Multiyear Plans may cover a 2- or 3-year period and include all the *projects* and *nonproject activities* to be conducted during that period. FNS recommends that States develop multiyear *SNAP-Ed Plans* when their planned nutrition education and obesity prevention *activities* employ a variety of *strategies* and incorporate *PSE* change *interventions*. States may find that planning, implementing, evaluating, and demonstrating progress on these *interventions* is better reflected using a multiyear Plan. All *State agencies* must submit a Plan, updated as appropriate, and budget annually, regardless of the number of years covered by other parts of the Plan.

When considering the approval of a State's request to submit a multiyear Plan, FNS will factor in the *State agency's*—

- Inclusion of a limited number of clear, concise, and well-written target population health-related nutrition and physical activity objectives
- Record of fiscal and program integrity
- Demonstration of a high degree of program stability resulting from experienced staff, consistent and reliable partners, and prior demonstration of *effective projects*
- Projections indicating the State's estimated future funding can support program *activities* over the course of a multiyear Plan

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A full list of FNS criteria for reviewing *SNAP-Ed Plans* can be found in Appendix C. Supplementary Checklists and Templates.

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

4.2.2. Annual Progression to SNAP-Ed Plans

State priority goals are established every 3 years as a part of the comprehensive *needs assessment.* In the second and third years of this cycle, the *SNAP-Ed Plan*, whether single or multiyear, must demonstrate a progression and/or flow of program *activities* in a logical and sequential manner with each year building on the preceding one. For example, year one can include conducting a *needs assessment* and performing baseline programming and/or piloting; year two can include program implementation and evaluation; and year three can include program expansion and further evaluation.

Table 4 expands on what is required in the *SNAP-Ed Plan* for each year of the *needs assessment* cycle.

Table 4. SNAP-Ed Plan Requirements

Plan Module	Year 1	Years 2 and 3
1: Target Audience and Needs Assessment • Identify the Target Audiences and Their Needs • Needs Assessment Process • State-Specific Nutrition and Physical Activity-Related Data on Target Population • Community Food Access Data • Demographic Characteristics of SNAP-Ed Target Audiences • SNAP Participation • Program Access and Appropriateness for Diverse Target Audiences • Coordination and Partnerships with Programs and Organizations from Multiple Sectors • Agency/Workforce Capacity	Required	Updates (if applicable)

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Plan Module	Year 1	Years 2 and 3
• Selected State Priority Goals Based on Needs Assessment		
2: SNAP-Ed Action Plan • Objectives and Indicators • Project SMART Objectives • SNAP-Ed Outreach • Action Plan Overview	Required	SMART objective and performance indicator updates (if applicable) *Project, nonproject activity*, and outreach updates (if applicable) The action plan overview should describe progress made in the last year and how the current Plan builds upon that progress
3: Planned Projects and Activities • Basic Information • Link Project to SMART Objectives • Approaches • Priority Populations • Project Outreach • Direct Education and Policy, Systems, and Environmental Settings • Social Marketing Campaign Scale • SNAP-Ed Toolkit Interventions • Other Previously Developed Interventions	Required	Required. May be updated from the previous year if a *project* is continuing
4: Planned Evaluations • Basic Information • Evaluation Details	Required for State and implementing agencies conducting formal evaluations	Required for State and implementing agencies conducting formal evaluations. May be updated from the previous year if an evaluation is continuing

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Plan Module	Year 1	Years 2 and 3
5: Coordination and Collaboration • Federal Nutrition, Obesity Prevention, and Health Programs • Multisector Partnership/ Coalitions • Tribes and Tribal Organizations • Minority Serving Institutions (MSIs)	Required	Required. May be updated from the previous year if coordination and collaboration are continuing
6: Planned Staffing and Budget • Planned Staffing • Implementing Agency Budgets • Project Budgets • Other SNAP-Ed Expenditures • Non-SNAP-Ed Funding • Travel • Budget for Indirect Costs • Estimated Unobligated Balance • Total Budget	Required	Required
Assurances and Signatures	Required	Required

SMART = specific, measurable, achievable, relevant, and time-specific

4.2.3. Plan Amendments

Per 7 CFR §272.2(f), *State agencies* must submit amendments of approved Plans to FNS for prior approval, with supporting documentation. **New:** Plan amendments may be submitted throughout the *FY*, but no later than May 1 of the current *FY*. Plan amendments are necessary whenever—

- The State or *implementing agency* SNAP-Ed program budget exceeds $100,000, and there is a change in planned *activities* that is expected to result in a change of 5 percent or greater of that particular State or *implementing agency's* total program budget. This includes State reallocations of funds among *implementing agencies* and *implementing agency* reallocation of funds among subcontractors.
- Budget revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs.
- There is a change in scope of State priority goals or objectives from the approved *SNAP-Ed Plan*.

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Examples of changes that may require a Plan amendment for agencies with SNAP-Ed program budgets that exceed $100,000 include the following:

- The transfer of funds from one or more cost categories (e.g., salary, contracts, travel, etc.) in a State or implementing agency's total budget to other cost categories that results in a change of 5 percent or greater of the total State or implementing agency budget.
- Significant expansion or reduction of *activities* that results in a change of 5 percent or greater of the total State or implementing agency budget. For instance, the incorporation of new *projects* or *interventions*.
- Requests for additional federally allocated funds in States that have not requested their full allocation.

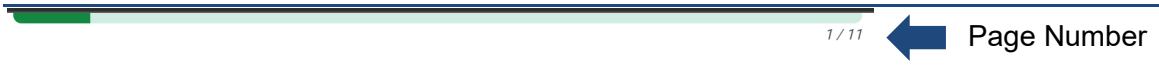
In amendments, States should indicate whether the request is for a new or revised *project* and whether funds will come from unobligated previous *FY* funds (carryover) or from a *project activity* that has been revised. States should provide a full description of the new or revised *activities*, providing similar information as for a new *project*. Submit amendments to the FNS Regional Office through N-PEARS. FNS recommends States consult with their Regional Office for technical assistance prior to submitting an amendment. **End of new material.**

4.3. Guidelines for Developing the SNAP-Ed Plan

Each *SNAP-Ed Plan* Module is discussed below. These explanations align with the information in N-PEARS. To the extent possible, external resources are identified in bullet form with live links; these resources and links can also be found on the SNAP-Ed Connection.

Throughout this section, parts of the Plan are identified by module and page number. State agencies have access to six modules in the Plan, and implementing agencies have access to modules 3–6 (Table 4). Within each module, the page number is shown in the upper righthand corner (Figure 5).

Figure 5. Example of page numbering in N-PEARS



4.3.1. Plan Module 1: Target Audience and Needs Assessment

States should deliver SNAP-Ed to maximize the number of *SNAP-Ed-eligible* individuals reached and the potential for behavior change among them. *State agencies* are required to conduct a comprehensive *needs assessment* every 3 years. The *needs assessment* should drive State priority goals; specific, measurable, achievable, relevant, and time-specific (SMART) objectives; performance indicators; and SNAP-Ed *projects* and their *target audiences*. The *needs assessment* must therefore identify the *target audiences'* needs and the strengths and areas for improvement of current SNAP-Ed programming in meeting those needs.

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

The *Needs Assessment* must—

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

FNS developed the SNAP-Ed Needs Assessment Toolkit to support State agencies in meeting program requirements and enhance their needs assessment capabilities. The toolkit offers suggestions to increase the diversity of voices involved throughout the needs assessment process and strategies to link needs assessment findings to State goals and SNAP-Ed programming. Two recorded needs assessment trainings are available on the SNAP-Ed Connection:

- SNAP-Ed Needs Assessment Webinar 1: Needs Assessment Purpose and Planning
- SNAP-Ed Needs Assessment Webinar 2: State-Level Approach

4.3.1.a. Needs assessment process (Plan Module 1, Page 2)

The SNAP-Ed *needs assessment* is led by the SNAP *State agency* and should be conducted through an inclusive and collaborative process that engages a variety of organizations and people involved and impacted by SNAP-Ed, including *implementing agencies*, partner

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entities, MSIs and other minority-serving organizations, Tribal Organizations, and, to the extent feasible, *SNAP-Ed-eligible* individuals.

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

4.3.1.b. Needs assessment findings (Plan Module 1, Pages 3–9)

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

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

- State WIC Program Data
- Behavioral Risk Factor Surveillance System
- National Survey of Children's Health
- Youth Risk Behavior Surveillance System
- America's Health Rankings
- State Department of Health data, including State Health Improvement Plan needs assessments
- USDA Economic Research Service Data Products
- Food Consumption and Nutrient Intakes
- American Time Use Survey Eating and Health Module
- Current Population Survey, Food Security Supplement
- State of Childhood Obesity
- Community Commons Maps and Data
- CDC obesity data and related information
- CDC State Indicator Reports, strategies, data, factsheets, social media tools, and resources on physical activity

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- County Health Rankings
- PolicyMap
- CARES HQ
- HealthLandscape
- The UDS [Uniform Data System] Mapper[14]
- SNAP-Ed Engagement Network

More general nutrition/food resources from CDC are available at the Resources Library.

Agencies can collect new data selectively if significant gaps in the available information are apparent. States may develop an objective related to improved *needs assessment* and propose new (primary) data collection (e.g., focus groups, surveys, and key informant interviews) as a *nonproject activity* in Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan. Plans should describe the questions to be answered in any new data collection and the steps proposed to answer them.

4.3.1.b.i State-specific nutrition and physical activity-related data on target population (Plan Module 1, Page 3)

State agencies are expected to provide information on the nutrition/physical activity, behavioral, and lifestyle characteristics of the target population. These statistics can help to identify the behaviors and health conditions to be addressed by SNAP-Ed programming. Agencies may include other statistics to enhance their ability to develop, target, and deliver appropriate *nutrition education and obesity prevention services* (e.g., dietary and food purchasing attitudes and habits, social and cultural values and norms). All data used in the *needs assessment* should be less than 5 years old.

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

When possible, *State agencies* should use the same data source as has been used in previous *SNAP-Ed Plans* to identify trends more readily. If data are available for populations that overlap (e.g., children aged 2–5, children aged 2–18), both may be reported if they illustrate different needs related to nutrition, physical activity, and health outcomes. For example, if both statewide data and WIC data on the body mass index of children aged 2–5 are available, both data points can be presented. Even though there is overlap in the populations represented by these two data points, the data from WIC may reveal information about a group of individuals eligible for SNAP-Ed not apparent from statewide data. *State agencies* are not expected to combine or reconcile information across data sources.

Agencies may include statistics on subpopulations that directly inform their goals, objectives, *projects*, and/or *nonproject activities*. For instance, local or Tribal nation obesity rates may be

[14] The UDS Mapper is a comprehensive tool that can be daunting because it contains much data. The Mapper has sliders for threshold levels of interest (i.e., percentage of population at or below 100 percent of the Federal poverty level). Unfortunately, there is no preset slider for 185 percent. The Mapper is free but requires registration.

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included separately to justify programming in a specific location or with a specific *priority population*.

4.3.1.b.ii. Community food access data (Plan Module 1, Page 4)

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

- USDA ERS Food Access Research Atlas and the Food Environment Atlas
- PolicyMap
- CARES HQ

4.3.1.b.iii. SNAP-Ed-eligible audiences

SNAP-Ed-eligible audience definition

Individuals readily identifiable as members of the *SNAP-Ed-eligible* audience include persons referred by the local SNAP office, persons reached through direct marketing to SNAP participants, parents ineligible for SNAP who receive SNAP benefits on behalf of their children, and SNAP participants in a SNAP Job Readiness Training Program. Members of Tribal Organizations participating in *FDPIR* also are eligible for SNAP-Ed. Refer to Section 3.4. Requirements for Coordination and Collaboration.

Income: Households certified for SNAP, including those in States with BBCE policies with gross income limits up to 200 percent of the Federal poverty level (FPL), are SNAP participants and are therefore eligible to the same programs and services as all SNAP participants, including SNAP-Ed. SNAP-Ed eligibility limits should not exceed the State threshold for BBCE.

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

While most able-bodied students aged 18–49 who are enrolled in college or other institutions of higher education at least half time are not eligible for SNAP and therefore not eligible to receive SNAP-Ed, a student may be able to receive SNAP benefits and participate in SNAP-Ed if otherwise income eligible and they—

- Get public assistance benefits under a Title IV-A program of the Social Security Act
- Take part in a State or federally financed work study program
- Work at least 20 hours a week
- Take care of a dependent household member under 6
- Take care of a dependent household member over 5 but under 12 and does not have adequate child care to enable them to attend school and work a minimum of 20 hours, or take part in a State or federally financed work study program

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- Are assigned to or placed in a college or a certain other school through—
  - A program under the Workforce Innovation and Opportunity Act of 2014
  - A program under Section 236 of the Trade Act of 1974
  - An employment and training program under the Food Stamp Act
  - An employment and training program operated by a State or local government
- Are a single parent enrolled full time in college and taking care of a dependent household member under 12

SNAP-Ed providers can address *SNAP-Ed-eligible* students' nutrition and food access needs by partnering with campus-based food pantries or social service providers. These *interventions* can include providing technical assistance and educational resources on healthy donation and nutrient-dense food selections to site partners and in-person or virtual minilessons with cooking demonstrations using pantry items or on food resource management. Refer to CDC Healthy Schools resources for more examples. CDC also lists approaches for supporting healthy nutrition in Early Care and Education settings.

See also SNAP student eligibility | USDA-FNS.

Qualifying locations: Persons at qualifying locations that serve *people with low income* are part of the *SNAP-Ed-eligible* audience. Information on the location of *food banks*, food pantries, *soup kitchens*, public housing, SNAP/TANF job readiness program sites, and other such sites may be included in additional files as part of SNAP-Ed Plan Module 1, page 5, to identify where the *target audiences* live, work, shop, play, eat, and learn. **New:** Agencies do not have to collect income eligibility documentation from participants at these locations because these sites generally serve the *SNAP-Ed-eligible* audience.

States can assess whether programming and resources are being used effectively and where most needed, by obtaining information on the number of persons that meet eligibility guidelines. To conduct this assessment, States may use eligibility documentation collected by the site or consider collecting demographic information and eligibility data themselves. For instance, some agencies include questions on participation in food assistance programs as part of their evaluation. **End of new material.**

Persons at other qualifying venues are considered *SNAP-Ed-eligible*. To qualify, documentation must show the location/venue generally serves *people with low income* where at least 50 percent of persons are income eligible. This would include, for example, residential housing communities, schools, or child care centers located in *census tracts* or other defined areas where at least 50 percent of persons have incomes consistent with eligible *poverty guidelines* or thresholds or children in schools where at least 50 percent of children receive free and reduced-priced meals.

Retail locations serving populations with low income: Persons shopping in food retailers serving populations with low income are considered *SNAP-Ed-eligible*. Retail locations must accept WIC and/or SNAP benefits to qualify as a site for SNAP-Ed *activities*. Although many retailers accept these benefits, States should approve only SNAP-Ed *activities* in locations that demonstrate significant patronage by individuals and families with low income. For instance, stores that accept WIC and/or SNAP and

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are located in *census tracts* where at least 50 percent of persons have gross incomes equal to or less than the percentage of the FPL used for SNAP-Ed eligibility[15] qualify as SNAP-Ed *activity* sites.

FNS recognizes that SNAP recipients do not necessarily shop at the stores closest to where they live.[16] *Census tracts* in some cases may not be the right measure. For example, in rural areas a particular store may be serving much of the SNAP population or be the only grocery outlet in the community for the entire population, including the population eligible for SNAP-Ed.

To understand community members' preferred SNAP and/or WIC retailers, *State* and *implementing agencies* should seek input from individuals and families eligible for SNAP and WIC and organizations that regularly serve individuals and families eligible for SNAP and WIC. States may submit proposals to their respective Regional Office with alternate methods for defining grocery stores that serve people potentially eligible for SNAP-Ed.

Demographic characteristics of SNAP-Ed target audiences (Plan Module 1, Page 5)

Review the pre-populated data on the race, ethnicity, Tribal status, age, primary language, and geographic location (county, parish, or ward) of the *SNAP-Ed target audience*. Note that 185 percent of the *FPL* (or the *State agency's* SNAP gross income limit, if higher) may be used as a proxy for the *SNAP-Ed-eligible* population. In the Plan, *State agencies* must indicate the *FPL* value they are using to identify the *SNAP-Ed-eligible* population. The following data sources may be useful for describing the *SNAP-Ed-eligible* audience:

- Census Bureau data
- State demographic surveys

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

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

Alternative methodology–Geographic Information System (GIS) Mapping: GIS mapping refers to a system for storing, editing, and displaying geographical information on a computer. In rural or frontier areas, urban residential areas that are economically intermixed, and certain island States and territories, few or no *census tracts* may be available with more than half of residents within the income threshold used for SNAP-Ed

[15] The percentage of the poverty threshold used to define SNAP-Ed eligibility is at least 185 percent nationwide. In places where SNAP policy allows SNAP eligibility with gross incomes above 185 percent (commonly 200 percent), that value may be used instead.
[16] Ver Ploeg, M., Mancino, L., Todd, J. E., Clay, D. M., & Scharadin, B. (2015, March). *Where do Americans usually shop for food and how do they travel to get there? Initial findings from the National Household Food Acquisition and Purchase Survey*. Economic Information Bulletin No. 138. U.S. Department of Agriculture, Economic Research Service.

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eligibility. States have used GIS mapping to identify census designated places (CDPs), which are concentrations of a population recognized by name but not legally incorporated as cities, towns, or other jurisdictions as defined by the State. One State compared the population with low income in the 10 largest CDPs with the overall State population to identify which CDPs have the greatest percentage of residents with low income for SNAP-Ed programming. SNAP-Ed agencies may find the following mapping tools useful:

- Capacity Builder: The Capacity Builder enables users (i.e., FNS staff, *State agencies*, partners) to identify areas of need using the percentage of children receiving free and reduced-price meals eligible under the School Meals Program in each census block group. Need can also be assessed by the total number of eligible children in a block group, which can also help estimate the number of meals needed in each area. Finally, certain traditionally underserved areas can be identified, such as Tribal lands and land on or near military bases. Once need is assessed, potential partners and site locations can be identified. Users can add information such as public and private schools; universities; school districts; rural development; and Department of Housing and Urban Development housing, libraries, and churches.[17]

- Community Commons: Community Commons is an online platform that supports change-makers working to advance equitable community health and well-being.[18] It brings together a network of partners that have developed and made publicly available a variety of data and mapping tools among other resources.

- **New:** The Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP) Area Eligibility Mapper: The Eligibility Mapper uses census data to show if CACFP day care homes are located in areas that qualify for Tier 1 rates in the CACFP or summer meal sites are located in areas that qualify for open sites in the SFSP. SNAP-Ed agencies can use this mapping tool to identify potential partners and site locations including day care homes, summer meal sites, and community organizations such as libraries and recreation centers. **End of new material.**

Alternative methodology 2–*Community Eligibility Provision (CEP)*: **New:** The CEP is a NSLP and SBP meal service option that allows schools and local educational agencies (LEAs) in high-poverty areas to offer meals at no cost to all enrolled students, without collecting household applications. FNS's CEP Final Rule, effective October 26, 2023, lowered the minimum identified student percent (ISP) required to elect CEP from 40 percent to 25 percent.

When considering CEP schools for SNAP-Ed funded activities, agencies must use the individual school-level ISP multiplied by 1.6 to arrive at an estimate of the total number of students eligible for free and reduced-price meals, even when CEP is elected district-wide or group-wide. SNAP-Ed providers should prioritize partnerships based on their State's needs assessment findings. Those findings may indicate more support is needed for non-school-based populations. SNAP-Ed should consider the resource and staffing limitations inherent in providing SNAP-Ed at all eligible schools, as that may divert resources from activities serving the non-school based populations.

[17] U.S. Department of Housing and Urban Development. (2022). Resource library. *HUD Exchange*. https://www.hudexchange.info/resources/
[18] Community Commons. (2022). *Well-being, data, equity*. http://www.communitycommons.org/

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Some States include ISP school-level data in their publicly available CEP eligibility lists; however, data should be verified with the school prior to school selection. Links to State CEP eligibility lists are provided below.

- CEP Status of School Districts and Schools by State | FNS
- FRAC CEP Database

For more information on CEP, please visit the CEP Resource Center website.

End of new material.

Alternative methodology 3–*Worksite Wellness Initiatives*: To deliver worksite wellness programs, SNAP-Ed providers can work with human resources staff to ensure 50 percent of the employees at the worksite are at or below the income threshold used for SNAP-Ed eligibility.

One State used data from the American Community Survey and Bureau of Labor Statistics to determine an hourly wage that would equate to no more than the income threshold used for SNAP-Ed eligibility for an average SNAP household with at least one member who earns income. More than half of workers must earn annual wages comparable with the income threshold used for SNAP-Ed eligibility for the worksite to qualify for SNAP-Ed programming. Worksites would be required to complete a form verifying the site's eligibility using this method. States may also choose to identify a minimum number of employees per worksite to justify the time, effort, and cost necessary to implement a multicomponent worksite wellness program.

- The Bureau of Labor Statistics maintains a website with mean and median wages for different occupations at Occupational Employment and Wage Statistics. States can use this website to identify which types of occupations would most likely fulfill SNAP-Ed eligibility requirements.
- CDC has resources for adopting food service guidelines, standards for healthier foods and beverages, and food service operations in worksite and community settings at Food Service Guidelines and Food Service Guidelines Implementation Toolkit.

Alternative methodology 4–*Social marketing outdoor advertising program*: Because of the rural nature of certain States, the use of *census tracts* to qualify *social marketing activities* for the *SNAP-Ed-eligible* audience is not cost-efficient for population reach. One State developed a targeting methodology for the outdoor advertising component of its *social marketing* program. The State used a free online mapping tool to identify locations of proposed billboards within 1,800 yards of SNAP-Ed qualifying schools and grocery stores, which are complementary channels for their *social marketing* program.

Alternative methodology 5–*prorating expenses for events with mixed-income audiences*: Certain events, such as a State or county fair, may not be located in eligible areas but have the potential to reach many SNAP-Ed participants and other *people with low income*. A State submitted a plan for a pro rata share of SNAP-Ed funds to pay for the specific costs that would benefit the *SNAP-Ed-eligible* population at the event. FNS calculated a weighted average of the percentage of residents in three target neighborhoods within the income threshold used for SNAP-Ed eligibility.

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4.3.1.b.iv. SNAP participation (Plan Module 1, Page 6)

Provide the number of SNAP households in each county, parish, or ward in the State using the most recent SNAP *State agency* data. SNAP participants are a priority audience for SNAP-Ed. While the *SNAP-Ed-eligible* population includes individuals who are not SNAP participants (e.g., households with low income not enrolled in SNAP), examining SNAP participation data helps to further describe where the *SNAP-Ed-eligible* population resides. These local data can be matched or mapped with SNAP-Ed reach data to identify localities where SNAP-Ed is serving high-need populations and those where there is particular need for expanded SNAP-Ed reach.

4.3.1.b.v. Program access for diverse target audiences (Plan Module 1, Page 7)

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

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

- Mode of delivery (e.g., online *interventions* are not appropriate for audiences with limited broadband access; in-person *interventions* may not be appropriate for people with limited access to transportation)
- Accommodations for people with disabilities
- Languages offered
- *Target audience* culture
- Time of delivery (e.g., offer *direct education* sessions for parents of preschoolers at times convenient to drop off and pickup)
- *Implementing agency* and staff (i.e., implemented by trusted organizations and staff within the *target audience* community)

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

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

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Then, use the most recent *Annual Report* to identify the places where SNAP-Ed programming has been offered. Compare the locations of SNAP-Ed and other programming to the places with the most *SNAP-Ed-eligible* people and SNAP participants identified through the *needs assessment* in Plan Module 1, pages 5–6.

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

Last, describe factors that limit the geographic reach of SNAP-Ed programming (e.g., lack of *implementing agencies* serving a location) and the *State* and *implementing agency's* plans for addressing those gaps (e.g., developing partnerships with new *implementing agencies*).

Other factors affecting program access for diverse target audiences

Describe how SNAP-Ed programming is reaching all groups within its *target audiences*. To identify reach among these groups, compare the characteristics of *direct education* participants from the most recent *Annual Report* with the characteristics of *SNAP-Ed-eligible* individuals identified in Plan Module 1, page 5. Consider which groups among the *target audience* are most and least likely to be reached by SNAP-Ed *direct education*.

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

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

Program appropriateness for diverse target audiences

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

To describe the strengths and weaknesses of SNAP-Ed programming appropriateness, the *State agency* should strongly consider obtaining input through new data collection efforts with SNAP-Ed participants and *SNAP-Ed-eligible* nonparticipants. This input should focus on SNAP-Ed programming's strengths or assets and weaknesses related to how well the program's service delivery methods, messages, and other attributes are tailored to support the behavioral change and *PSE* change needs of different segments of the *SNAP-Ed-eligible*

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audience. *State agencies* must also explain how the *State agency* and *implementing agencies* will address factors limiting program appropriateness.

4.3.1.b.vi. Coordination and partnerships with programs and organizations from multiple sectors (Plan Module 1, Page 8)

Review the collaboration, coordination, and partnerships described in the most recent SNAP-Ed *Annual Report*. Consider the programs, multisector partnerships and coalitions, Tribal Organizations, and MSIs SNAP-Ed coordinates with. Then, describe the strengths and areas for improvement in coordination and partnerships.

4.3.1.b.vii. Agency/workforce capacity (Plan Module 1, Page 9)

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

- *State* and *implementing agencies* may consider using the Society for Nutrition Education and Behavior Nutrition Educator Competencies to assess strengths and weaknesses of their nutrition educators.
- Nutrition educators can enhance their nutrition knowledge and teaching skills by completing the National Nutrition Certification Program, a free online learning and certification program available through Utah State University Extension's SNAP-Ed program.

4.3.1.c. Selected State priority goals based on needs assessment (Plan Module 1, Page 10).

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

Most goals should be population based and health related, focusing on nutrition and physical activity needs of the target population. Goals can focus on specific subpopulations, including expanding program reach to underserved high-need populations and improving outcomes at the individual, organization, or community levels. At least one goal is expected to focus on improving program access or appropriateness. States are also encouraged to include at least one priority goal related to (1) expanding or strengthening partnerships and collaborations with other organizations and sectors or (2) strengthening SNAP-Ed workforce capacity. For each goal, indicate one or more goal types:

- Improve health behaviors.
- Improve PSE settings.

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- Improve multisector outcomes.
- Improve SNAP-Ed access.
- Improve appropriateness of SNAP-Ed programming.
- Expand or strengthen coordination and collaboration with other programs.
- Collaborate with multiple sectors.
- Strengthen workforce capacity.
- Develop/strengthen innovations in programming.
- Other.

Goals may be revised annually to reflect new needs identified from *needs assessment* updates.

4.3.2. Plan Module 2: SNAP-Ed Action Plan

State agencies complete this module to show how the priority goals identified in Section 4.3.1. Plan Module 1: Target Audience and Needs Assessment based on the *needs assessment* align with (1) the objectives set to accomplish the goals, (2) performance indicators used to measure progress, and (3) *projects* and *nonproject activities* planned to achieve the objectives.

4.3.2.a. Objectives and indicators (Plan Module 2, Page 1)

FNS encourages States to select five to seven priority goals and create at least one SMART objective for each goal. A well-written and clearly defined SMART objective is—

- Specific: identifies a specific event or action that will take place
- Measurable: quantifies the amount of change to be achieved
- Appropriate: is logical and relates to the State's SNAP-Ed goals
- Realistic: is practical, given available resources and proposed SNAP-Ed *activities*
- Time-specific: specifies a time the objective will be achieved within the *FY(s)* of the Plan

State agencies complete Plan Module 2. However, *State agencies* should develop the content they submit in Plan Module 2 through an inclusive and collaborative process that engages a variety of organizations and people involved in and impacted by SNAP-Ed, including *implementing agencies*, partner entities, MSIs and other minority-serving organizations, Tribal Organizations, and, to the extent feasible, *SNAP-Ed-eligible* individuals.

SNAP-Ed Plans may include process and outcome objectives. Outcome objectives specify a desired behavior or health change. Process objectives are accomplishments expected to lead to behavior and/or health changes. For example, a State-level process objective could be, "By the end of the *FY*, the *State agency* will have established collaborative relationships

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with four *food banks* to increase access to healthier food choices at their facilities for the SNAP-Ed target population."

SMART objectives should be designed to be accomplished within the 3-year *needs assessment* cycle. A single objective may describe something to be accomplished over the course of 2 to 3 years, or they may be written in 1-year segments, with each year building on the previous one. An example follows:

- Objective Year 1: By September 30, 2024, conduct formative research for a *social marketing* campaign. Formative research includes focus groups, stakeholder interviews, and analysis of State-level and national datasets to select SNAP-Ed-eligible communities and cross-reference with indicators from the SNAP-Ed Evaluation Framework.
- Objective Year 2: By September 30, 2025, conduct a Healthy Behavior *social marketing* campaign that will promote common behavior change nutrition education messages to *SNAP-Ed-eligible* individuals with an annual overall marketing reach of at least 25 million to include media *impressions*, website visitors, and social media supporting local contractors in the five service areas of Food Systems, Active Living, School Health, Early Childhood Development, and Direct Education.
- Objective Year 3: By September 30, 2026, evaluate implementation of the *social marketing* campaign, campaign recall by a sample of *target audience* members, and engagement level of multisector partners.

State agencies must **identify performance indicators to track progress on all objectives**. **Whenever possible, State agencies should use indicators from the** SNAP-Ed Evaluation Framework. N-PEARS collects data on certain Evaluation Framework performance indicators. For the prior example objective on establishing collaborative relationships with *food banks*, ST7: Organizational Partnerships provides possible performance indicator measurements, such as ST7c (description of partnership accomplishments and lessons learned). Because some objectives will relate to topics such as workforce capacity or processes, not all performance indicators used to measure progress on SMART objectives will come from the SNAP-Ed Evaluation Framework.

4.3.2.b. Project SMART objectives (Plan Module 2, Page 2)

State agencies do not directly enter any information into Plan Module 2, page 2. Information entered in Plan Module 3 is used to populate the tables shown in Plan Module 2, page 2, which *State agencies* should review to ensure appropriate alignment of *projects* and *nonproject activities* with SMART objectives. *State agencies* should also review the tables to ensure all SMART objectives are adequately addressed by the planned *projects* and *nonproject activities*.

An effective *SNAP-Ed Plan* will use *interventions* across multiple levels of the *SEM*. *State agencies* must make sure their Plan includes evidence-based *activities* using two or more *SNAP-Ed Approaches*, including individual or group-based direct nutrition education, health promotion, and *intervention strategies* with one or more additional approaches as described under Section 4.1. Comprehensive Projects and Plans. States may use the SNAP-Ed Library to find peer-reviewed, evidence-based *interventions* that qualify for use in SNAP-Ed. States may consult with their FNS SNAP-Ed Regional Coordinator on other

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interventions that may be allowable even if they are not currently featured in the SNAP-Ed Library. FNS recommends States use FNS, CNPP, or other Federal governmental agency-developed or recommended materials when possible.

FNS encourages States to consider applying the *Reach Effectiveness Adoption Implementation Maintenance (RE-AIM)* framework in selecting SNAP-Ed *interventions*. The *RE-AIM* framework is designed to enhance the quality, speed, and public health impact of efforts to translate research into practice. The five *RE-AIM* steps to translate research into action appear in the text box. More information on *RE-AIM* can be found at the RE-AIM website.

4.3.2.c. SNAP-Ed outreach (Plan Module 2, Page 3)

All *State agencies* must conduct SNAP-Ed outreach, such as recruiting participants for direct education classes. Outreach specific to a SNAP-Ed *project* may be described in Section 4.3.3. Plan Module 3: Planned Projects and Activities. In Plan Module 2, *State agencies* should summarize only general outreach efforts not tied to a specific *project*. Examples of SNAP-Ed outreach include linkages and referrals with facilities and programs that serve *people with low income*, such as county offices, *food banks*, public housing, and public assistance offices. *State agencies* may also provide SNAP-Ed information on bulletin boards or through electronic media.

The five RE-AIM steps

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

4.3.2.d. Action Plan overview (Plan Module 2, Page 4)

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

4.3.3. Plan Module 3: Planned Projects and Activities

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

Implementing agencies complete Plan Module 3. *State agencies* that will conduct *projects* and/or *nonproject activities* must also complete Plan Module 3.

A SNAP-Ed *project* is an *intervention* or a cluster of *interventions* or *activities*[19] with common goals, intended outcomes, *target audiences* (e.g., youth), and implementation setting types (e.g., school). *State* and *implementing agencies* are strongly encouraged to review Section 4.4.1. Report Module 1: Project and Activity

[19] *Project activities* include planning and reporting

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Results to understand the requirements for reporting the outcomes of *projects*. It is critical during the planning stage for agencies to **identify the indicators that will be measured for each project and identify the methods that will be used to collect the measurements.**

Nonproject activities are all efforts funded by SNAP-Ed other than *projects* designed to accomplish State priority goals and objectives. Examples include comprehensive *needs assessments*, general staff training (e.g., civil rights training), technical assistance, and peer-to-peer learning that benefit staff across multiple *projects*. Other examples include convening of coalitions, contracted services such as evaluation and formative research, and other *activities* not tied to a specific *project*.

Projects are a central unit of SNAP-Ed planning and reporting. In the Plan, agencies must provide a budget for each *project*. In the *Annual Report*, agencies are expected to report results and expenditures by *project*.

4.3.3.a. Basic information (Plan Module 3, Page 1)

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

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

4.3.3.b. Link project to SMART objectives (Plan Module 3, Page 2)

All *projects* must be designed to accomplish one or more SNAP-Ed SMART Objectives included in Plan Module 2. Indicate which SMART Objective(s) the *project* will address.

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4.3.3.c. Approaches (Plan Module 3, Page 3)

Indicate the stage(s) of implementation for each approach (i.e., *direct education*; *PSE* change; *social marketing*) that is part of the *project*. Select all stages of implementation the *project* is anticipated to enter during the *FY*. For *direct education* and *social marketing*, also indicate the language(s) to be used.

4.3.3.d. Priority populations (Plan Module 3, Page 4)

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

4.3.3.e. Project outreach (Optional) (Plan Module 3, Page 5)

SNAP-Ed Outreach across the entire program is described by *State agencies* in Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan. If any outreach efforts specific to a *project* will be conducted, describe them in this optional page of Plan Module 3. To avoid duplication, review Plan Module 2 before completing Plan Module 3.

4.3.3.f. Direct education and PSE settings (Plan Module 3, Page 6)

Indicate the settings in which *direct education* and *PSE interventions* will be conducted. For each setting, provide the total planned number of sites (inclusive of those in Tribal jurisdictions and rural locations), the planned number of sites in Tribal jurisdictions, and the planned number of sites in rural locations. A single site should be classified as only one setting type. The total number of sites across all settings will represent the total number of unique sites where the project will be implemented. Also indicate if *direct education*, *PSE*, or both will be implemented in each setting. Agencies may use the Federal Office of Rural Health Policy Data Files or the Rural Health Grants Eligibility Analyzer to identify rural locations.

4.3.3.g. Social marketing campaign scale (Plan Module 3, Page 7)

Accurately describing the geographic scale of *social marketing campaigns* is important for budget justification and to demonstrate the extent to which SNAP-Ed will reach the areas with the greatest need as identified by the *needs assessment* in Section 4.3.1. Plan Module 1: Target Audience and Needs Assessment. To describe the scale of a *social marketing campaign*, indicate the largest geographic unit used to plan the campaign. The largest geographic unit used for planning is defined as the biggest area to be covered in its entirety by the campaign. For instance, if a social marketing campaign will cover the entirety of four towns/cities but not the entirety of the county that contains those towns/cities, the largest geographic unit used for planning would be towns/cities. If the *social marketing campaign* is planned by ZIP Code, *census tract*, towns/cities, counties/parishes/wards, and/or reservations, select the appropriate options to indicate where the campaign will be implemented. If the campaign is planned by schools, in-State media markets/metropolitan statistical areas/multicounty regions, multi-State media markets, and/or another means, describe the geographic areas to be covered by the *social marketing campaign*.

For all campaigns, indicate the projected reach of the campaign. *Social marketing* reach is the total number of unique individuals exposed at least once to campaign materials during a given period. FNS requests the projected reach to better determine the cost-

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effectiveness of *social marketing campaigns*. Information on estimating *social marketing* reach is provided in Market Segments (MT12b) and Impression, Reach, and Engagement in Section 4.4.1.g.iii. Implementation and Evaluation Stage Results. Agencies are required to report *impressions* and may report reach in the *Annual Report*.

4.3.3.h. Evidence base of project interventions

Use Plan Module 3, page 8, to describe the *SNAP-Ed Toolkit interventions* that will be used. Use Plan Module 3, page 9, to describe the evidence base for other previously developed *interventions* that will be used. Use Plan Module 3, page 10, to describe new *interventions* and the work planned to develop an evidence base for them.

4.3.3.h.i. SNAP-Ed Toolkit interventions (Plan Module 3, Page 8)

New: In *FY* 2024, the *SNAP-Ed Toolkit* website was moved to SNAP-Ed Connection. The *interventions* from the *SNAP-Ed Toolkit* are now referred to as "SNAP-Ed interventions" in the SNAP-Ed Library. However, those *interventions* will continue to be referred to as *SNAP-Ed Toolkit interventions* in this section for consistency with N-PEARS. **End of new material.**

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

If an agency is planning to adapt a *SNAP-Ed toolkit intervention*, the agency should work with the original *intervention* developer to make the identified adaptations, evaluate the modified *intervention* to demonstrate *effectiveness*, and share results with the original *intervention* developer. Agencies can describe the outcomes of this work in Report Module 2.

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

4.3.3.h.ii. Other previously developed interventions (Plan Module 3, Page 9)

For each other previously developed *intervention* that will be used, indicate the *intervention* name, whether the FNS Regional Office has granted approval to use this *intervention* prior to Plan submission, and whether the *intervention* will be adapted for the *project* setting(s) or *propriety population*. Briefly describe any planned adaptations and explain how the adaptations will better meet the needs of the *priority population* and/or better fit the *project* setting than the original *intervention*. If an agency is planning to adapt a previously developed *intervention*, the agency should work with the original *intervention* developer to make the adaptations, evaluate the modified *intervention* to demonstrate *effectiveness*, and share results with the original *intervention* developer. Then, select the level of evidence supporting the previously developed *intervention* and

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provide the information requested to demonstrate the *intervention* meets the selected level of evidence:

- Research-tested: The approach is based on relevant rigorous nutrition and public health nutrition research, including systematically reviewed scientific evidence and other published studies and evaluation reports that demonstrate significant effects on individual behaviors; food/physical activity environments; or policies across multiple populations, settings, or locales. Agencies should indicate if the approach has been included in a compendium of research-tested *interventions* (e.g., FNS Nutrition Evidence Library). Otherwise, agencies need to provide a citation to demonstrate an *intervention* is research-tested.
- Practice-tested: The approach is based upon published or unpublished evaluation reports and case studies by practitioners working in the field; these studies must show positive effects on individual behaviors, food/physical activity environments, or policies. Agencies must provide a citation to demonstrate an *intervention* is practice-tested.
- Emerging: The intervention includes community- or practitioner-driven *activities* that have the potential for effects on individual behaviors; food/physical activity environments; or policies across multiple populations, settings, or locales but has not yet been formally evaluated for these outcomes. Evaluation areas of focus may reflect cultural or community-informed measures of success. For *interventions* identified as emerging, agencies must describe the foundational evidence base to be developed to establish or grow the evidence base for the *emerging intervention*. *Emerging interventions* must meet the following criteria:
  - Align with the DGA, PAG for Americans, or the Healthy People 2030 objectives for Nutrition and Healthy Eating.
  - Reflect the budgetary and time constraints of populations with low income.
  - Reflect solutions that would make healthy eating and physically active lifestyles easier and more appealing to SNAP-Ed participants.
  - Include a plan for evaluation of effects on individual behaviors, food/physical activity environments, or obesity prevention policies.
  - Accomplish at least one of the following:
    - Reflect the social, cultural, and/or linguistic needs and resources of the population(s) with low income served.
    - Address the results and implications of a State or community needs assessment.
    - Address State or local priorities/strategic plans.

4.3.3.h.iii. New interventions (Plan Module 3, Page 10)

The development of a new *intervention* is sometimes necessary when no existing *interventions* appropriate for a target population are available. Before developing new *interventions*, agencies should conduct thorough literature reviews or environmental scans to justify their need. For each new *intervention* that will be used, indicate the *intervention* name and whether the FNS Regional Office has granted approval to use this

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intervention prior to Plan submission. Then, describe who will be involved in developing the *intervention*, the *intervention strategies*, and materials. Explain the evaluation plan that will establish a foundational evidence base for the new *intervention*.

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

4.3.4. Plan Module 4: Planned Evaluations

State and *implementing agencies* that will conduct formal evaluations complete Plan Module 4. Formal evaluation is not required for all SNAP-Ed *projects*, so Plan Module 4 will not be completed by all *State* and *implementing agencies*.

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

An evaluation plan is not required for standard *project monitoring* that must be conducted for all SNAP-Ed *projects*. *Project monitoring* includes the collection and analysis of data on how the *project* was implemented and the outcomes the *project* was anticipated to affect. Frequently, the outcomes measured during SNAP-Ed *project monitoring* are short- and medium-term measures from the SNAP-Ed Evaluation Framework. Especially in instances when the measured outcomes differ from what was expected, implementation data can be used to understand the outcomes. If the *project* was not implemented as planned, quality improvement efforts may focus on implementation fidelity. If the *project* was implemented as planned, and the results differed from what was expected, quality improvement efforts might instead focus on *project* adaptations or even selecting entirely different *interventions*. Refer to Section 4.4.1. Report Module 1: Project and Activity Results to see the required and optional reporting for data collected through *project monitoring* efforts.

Evaluation meets the reasonable and necessary standard when the evaluation—

- is a systematic process that uses objective data to learn about the strengths and weaknesses of programs and practices
- is essential to learn what works and how well it works so you can direct SNAP-Ed resources to the most effective programs. Evaluation is needed for effective *project*/ program management, efficiency, and accountability
- can help achieve greater positive impact on the nutrition and health of *people with low income*, families, and their communities
- includes a description of the proposed *activity* (i.e., has an approved Plan Module 4 evaluation plan)
- Status and available results are included in Report Module 2

For more information about evaluation, see

Appendix D. SNAP-Ed Connection Website and the following publications:

- Nutrition Education: Principles of Sound Impact Evaluation
- SNAP-Ed Evaluation Framework and Interpretive Guide
- Evaluating Social Marketing in Nutrition: A Resource Manual
- WIC Evaluation Resource Guide
- Addressing the Challenges of Conducting Effective SNAP-Ed Evaluations: A Step- by-Step Guide

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

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

- **Formative:** Formative evaluation is conducted during the development of an *intervention* to shape the features of the *intervention* prior to implementation. It may be used to determine whether a *priority population* understands the nutrition messages or to test the feasibility of implementing a previously developed *intervention* in a new setting. It may also involve testing of consumer and intermediary elements within program delivery, including consumer communication materials, training and *intervention* aids, and evaluation instruments. Formative research results are used to shape the features of the *intervention* itself prior to implementation, including adapting elements of an existing evidence-based *intervention* to a new audience, geographic area, or setting.

- **Process:** Process evaluation systematically describes how an *intervention* looks in operation or actual practice. It can involve such measures as tracking the number of materials distributed, counting the number of clients reached, measuring the *effectiveness* of alternate methods of delivering services, and documenting barriers to implementing the *intervention*. Process evaluation may also include a description of the context in which the program was conducted such as its participants and setting. Process evaluations are used to determine whether an *intervention* was implemented as intended. For *interventions* with a strong, established evidence base, ensuring implementation with fidelity can increase the likelihood the *intervention* yields the expected outcomes. For new *interventions* and *interventions* with emerging evidence, process evaluation results can help implementers interpret their results (e.g., could a lack of behavior change be related to a failure to properly implement the program or the program's lack of appropriateness for the audience?). Process evaluation results can also illuminate ways of overcoming identified barriers.

- **Outcome:** Outcome evaluation addresses the question of whether group changes or differences occur in conjunction with an *intervention*. Measuring shifts in a target group's nutrition knowledge before and after an *intervention* is an example of outcome evaluation. Such evaluation indicates the degree to which the intended outcomes occur among the target population. It does not provide definitive evidence, however, that the observed outcomes are the result of the *intervention*.

- **Impact:** Impact evaluation allows one to conclude authoritatively whether the observed outcomes are a result of the *intervention*. To draw cause-and-effect conclusions, impact evaluations incorporate research methods that eliminate alternative explanations. This approach requires comparing those who receive the *intervention* (e.g., persons, classrooms, communities) with those who receive either no treatment or an alternative *intervention*. The strongest impact evaluation randomly

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assigns the unit of study to treatment and control conditions, but quasi-experimental research designs are sometimes the only alternative available. Impact evaluations should meet the criteria described in FNS's *Nutrition Education: Principles of Sound Impact Evaluation*.

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

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

Complete one copy of Plan Module 4 for each evaluation to be conducted by dedicated evaluation staff.

4.3.4.a. Basic information (Module 4, Page 1)

Provide a descriptive name for the evaluation and the *project(s)* included in the evaluation. An evaluation may encompass one or more *projects*.

4.3.4.b. Evaluation details (Module 4, Page 2)

First, indicate the evaluation type(s) (formative, process, outcome, impact) to be carried out during the Plan year. For formative and process evaluations, indicate the following:

- *Project* components to be evaluated and evaluation dates; an evaluation may span multiple years
- Data collection methods (e.g., self-administered paper survey, qualitative interview, focus group)
- Planned use of results (e.g., *intervention* design, *intervention* adaptation or improvement), which should help to justify the evaluation

For outcome and impact evaluations, indicate the following:

- *Project* components to be evaluated and evaluation dates; an evaluation may span multiple years
- Objectives that will be measured
- Data collection methods (e.g., self-administered paper survey, qualitative interview, focus group)
- Impact evaluation only: evaluation design (randomized controlled trial; not randomized, with comparison group)
- Times measurements will be collected (i.e., pretest, posttest, other)

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- Link or citation for any prior outcome or impact evaluations; agencies conducting formal evaluations must conduct a thorough literature review and environmental scan to ensure the planned evaluation will not duplicate prior work
- Planned use of results (e.g., *intervention* adaptation or improvement, dissemination), which should help to justify the evaluation

For all evaluations, agencies may upload a logic model to help explain the *project(s)* and evaluation.

Objectives to be used in an evaluation must come from Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan. If the evaluation will include measurement of outcomes other than those corresponding with objectives from Plan Module 2 and those outcomes are well aligned to the State priority goals and objectives, consider modifying Plan Module 2.

4.3.5. Plan Module 5: Coordination and Collaboration

State and *implementing agencies* complete Plan Module 5.

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

Note: A written agreement such as an MOU outlining the responsibilities of all the *State agencies* involved in the collaboration should be kept on file for SNAP-Ed *projects* delivered in coordination with another agency when funds are involved. Written agreements are required for all other collaborations that involve any type of financial or budget management issues, including when SNAP-Ed provides reoccurring staff time and effort to an organization. States may maintain written agreements in electronic format. The agreement should list the location and the contact information for the responsible person(s) for each *project* implemented locally. A separate MOU for each local *project* implemented under it is not necessary. The State agreement is signed by all the *State agencies* involved.

Examples where an agreement would be necessary are school-based *projects* that collaborate with the State Department of Education or a breastfeeding *project* that collaborates with the WIC *State agency*. In the WIC example, one agreement would be signed between the State WIC agency and the SNAP *State agency* that would have a list of all the local breastfeeding *projects* to be implemented under the agreement. For the county governments, if there is no “umbrella” organization that can sign an agreement on behalf of the local entities, a written agreement for each local *project* is needed. These agreements should be updated, at a minimum, whenever there is a change in *activities*, responsibilities, and/or time periods included. Agencies must maintain copies of these agreements.

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4.3.5.a. Federal nutrition, obesity prevention, and health programs (Plan Module 5, Page 1)

Per 7 CFR §272.2(d)(2)(viii), States must consult and coordinate with State and local operators of other FNS programs when developing their *SNAP-Ed Plan* so SNAP-Ed complements the nutrition education and obesity prevention activities of those programs. Indicate the Federal programs SNAP-Ed will coordinate with and the purpose of the coordination (e.g., *needs assessment*/plan development, coordination of messaging/materials/approaches, *PSE* change efforts, *social marketing campaigns*, improvement of SNAP-Ed access for *target audiences*, and/or other). A brief narrative description of how coordination efforts avoid duplication of services should be provided in the action Plan overview in Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan, especially when two *implementing agencies* are working in the same venue or jurisdiction. See details in Section 4.4.5. Report Module 5: Coordination and Collaboration.

In Section 4.4.5. Report Module 5: Coordination and Collaboration, agencies will complete a nearly identical section on Federal programs. Most of the coordination and collaboration information from the Plan will autopopulate to the *Annual Report*. An important distinction to consider during the planning phase is that in the *Annual Report*, only significant coordination and collaboration conducted with other Federal programs are included. The Plan therefore should include only significant coordination and collaboration. To be considered significant, regular ongoing dialogue and information or resource sharing must be in place. Providing space only for SNAP-Ed programming or distributing SNAP-Ed materials is not considered significant coordination or collaboration.

4.3.5.b. Multisector partnerships/coalitions (Plan Module 5, Page 2)

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

Agencies must indicate the name of each partnership/coalition, the sectors represented, and the geographic level of each partnership/coalition. **New:** When identifying which sector an organization belongs to, consider the organization's contribution to the multisector partnership or coalition. An organization may fall into more than one sector type, but it should only be reported as the most relevant sector type for that particular partnership or coalition. For example, a public health department might represent government or public health depending on the nature of the partnership/coalition. State and implementing agencies should use their judgment in determining how to classify organizations in the sector types. **End of new material.** Agencies must also provide a brief description of key *activities* planned with each partnership/coalition.

4.3.5.c. Tribes and Tribal Organizations (Plan Module 5, Page 3)

States are required to consult with Tribal Organizations and must describe how they have done so in their *SNAP-Ed Plans*. SNAP-Ed Regional Coordinators can approve

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only *SNAP-Ed Plans* that include the following for each Federal or State-recognized American Indian and Alaska Native Tribe or Tribal representative the agency consulted, coordinated, or collaborated with on SNAP-Ed planning and/or implementation:

- Name of the Tribe participating in the consultation
- Name and title of the primary contact
- Nature of planned consultation, coordination, and collaboration efforts, including staff time in *FTEs* and funding distribution to the Tribe if applicable
- Brief description of the outcome of the consultation and how it will impact the State *SNAP-Ed Plan*
- Description of written comments received

4.3.5.d. Minority-Serving Institutions (MSIs) (Plan Module 5, Page 4)

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

Agencies coordinating and/or collaborating with MSIs should provide the following:

- Name of the MSI
- MSI type (i.e., HBCU, HIS, TCU, AANAPISI)
- Nature of planned consultation, coordination, and collaboration including staff time in *FTE* and funding distribution to MSIs if applicable
- Brief description of the planned coordination and collaboration

4.3.6. Plan Module 6: Planned Staffing and Budget

State and *implementing agencies* must complete this module to describe their planned staffing and budgets. Agencies may download the budget template from N-PEARS, fill it in offline, and upload the completed budget, or they may directly enter their budget into N-PEARS.

> *State* and *implementing agencies* complete Plan Module 6.

4.3.6.a. Planned staffing (Plan Module 6, Page 2)

SNAP-Ed funds are used to pay staff who support SNAP-Ed delivery. For each staff person who will be paid using SNAP-Ed funds, provide the position title; *FTEs* charged to SNAP-Ed; percentage of SNAP-Ed time spent on management and administrative duties (including training, professional development, required Federal reporting); percentage of SNAP-Ed time spent on SNAP-Ed delivery; and SNAP-Ed salary, benefits, and wages. The information about time allocation should align with information provided in the attached position descriptions.

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Position title examples include Nutrition Educator and Project Coordinator. Do not include names or identifying information. Attach a document with brief job descriptions for each position (i.e., list SNAP-Ed-related job duties that demonstrate how the position will support SNAP-Ed *activities*). Indicate any vacant positions by writing "(vacant)" next to the position title; for example, "Nutrition Educator (vacant)."

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

For *FTEs* charged to SNAP-Ed, States may use the definition of *FTE* provided in Appendix E: Definitions of Terms or provide their own definition of *FTEs* for purposes of reporting SNAP-Ed staffing needs. Agencies using their own definition should provide an explanation of how *FTEs* are calculated.

For the total salary, benefits, and wages to be paid with SNAP-Ed funds, an estimate may be used for the budget provided in this module. For the financial reporting in Section 4.4.6. Report Module 6: SNAP-Ed Financial Reporting, actual time employees spent on SNAP-Ed must be used to determine expenditures.

4.3.6.b. Implementing agency budgets (Plan Module 6, Page 3)

Plan Module 6, page 3, lists the total planned operating budget for the *FY* for each *implementing agency* in the State. No information is entered for this module; the information presented is based on data entered in the other pages of Module 6. This page will be displayed only for *State agencies*.

Retain a copy of any interagency agreements that identify how Federal funds will be paid between the State or county agency and/or other agencies.

4.3.6.c. Project Budgets (Plan Module 6, Page 4)

Each agency that implements during the *FY* projects should enter its own direct costs in the planned operating budget for each SNAP-Ed *project* that includes all relevant direct cost categories, including those associated with developing the *SNAP-Ed Plan* and *Annual Report*. Refer to the text box for direct cost categories. For more detail, see Section 3: Financial and Cost Policy.

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

4.3.6.d. Other SNAP-Ed expenditures (Plan Module 6, Page 5)

Provide the planned operating budget for other SNAP-Ed expenditures, if applicable, that includes all relevant direct cost categories. Other SNAP-Ed expenditures may include nonproject activities described in Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan and other activities not accounted for in a project budget (e.g., negotiating subgrantee

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contracts/agreements, providing civil rights training, contracted services such as evaluation or formative research).

4.3.6.e. Non-SNAP-Ed funding (Plan Module 6, Page 6)

Indicate non-SNAP-Ed public and private funding support for the *projects* and other *activities* included in the *SNAP-Ed Plan*.

4.3.6.f. Travel (Plan Module 6, Page 7)

For each trip, provide a trip name, brief description of its purpose, and how it will benefit SNAP-Ed; the location; the staff positions traveling; the costs for air travel, mileage, and lodging; and per diem. For out-of-state travel, also include the costs of ground transportation and registration fees. State and implementing agencies may bundle trips. For instance, a separate entry is not required for each trip made to a project site for a given intervention.

4.3.6.g. Budget for indirect costs (Plan Module 6, Page 8)

Indicate the total indirect costs under SNAP-Ed funding and the total indirect costs under other sources of funding. For more detail on indirect costs, see Section 3.5.6.b.iii. Indirect costs in the Financial and Cost Policy Supplement. Agencies may enter a percentage or total projected indirect cost and should provide an explanation.

4.3.6.h. Estimated unobligated balance (Plan Module 6, Page 9)

Provide the total estimated unobligated balance/carryover from the previous *FY*.

4.3.6.i. Total budget (Plan Module 6, Page 10)

Review the summary of the planned budget and provide a narrative justification for the following:

- Salaries/benefits
- Contracts/subgrants/agreements
- *Noncapital equipment*/office supplies
- Nutrition education materials
  - If a cost is associated with using existing educational materials, provide a justification for using proposed materials versus those available at no cost. Describe any new materials you plan to produce or purchase, and justify the need and cost
- Travel
- Building/space lease or rental
- Cost of publicly owned building space
- Maintenance and repair

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- Institutional memberships and subscriptions
- Equipment and other capital expenditures

4.3.7. Assurances and Signatures

To ensure compliance with policies described in this Guidance, the *SNAP-Ed Plan* includes specific assurances. For example, a *State agency* is responsible for civil rights compliance of its *subgrantees*, contractors, and subrecipients. The SNAP *State agency* (the *cognizant agency*) is responsible for ensuring the compliance of all funded providers. Refer to the Assurances and signatures information below for the full list of assurances.

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

The *SNAP-Ed Plan* must be signed by the head of the *State agency* and submitted prior to funding of nutrition education and obesity prevention *activities* when the *State agency* elects to request Federal grant funds to conduct these SNAP-Ed *activities*.

4.4. Guidelines for Developing the Annual Report

The SNAP-Ed *Annual Report* describes *project activities*, outcomes, and expenditures for the prior *FY* and must be submitted in N-PEARS by January 31 of each year.

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Each SNAP-Ed *Annual Report* module is discussed below and include explanations on what information should be entered in N-PEARS. Information entered into the *FY* 2024 Plan automatically carries into the *FY* 2024 Report; agencies need to review and update this Plan information as needed. To the extent possible, external resources to support agencies' work on the *Annual Report* are identified below in bullet form with live links; these resources and links can also be found at the SNAP-Ed Connection.

4.4.1. Report Module 1: Project and Activity Results

State and *implementing agencies* that conducted *projects* during the *FY* must complete Report Module 1 to describe the results of those *projects*. All data required in Report Module 1 should be collected through *project monitoring* efforts. One copy of Report Module 1 must be completed for each *project*. Planned *projects* will populate from the corresponding plan in the *Annual Report*. Any *projects* or *nonproject activities* not included in the Plan can be added when completing the Report.

4.4.1.a. Basic information (Report Module 1, Page 1)

Review the overview of the *project*, considering whether anything significant changed between planning the *project* and implementing it during the report year. Refer to Plan Module 3, pages 8–10 for more detail or for guidance on what to include in unplanned projects.

4.4.1.b. Interventions used (Report Module 1, Page 2)

Review and update (if needed) the interventions implemented as part of this project during the reporting *FY*. Agencies may add new *interventions*, previously developed *interventions*, and *SNAP-Ed Toolkit interventions* used during the *FY*. Refer to Plan Module 3, pages 8–10 for more detail.

4.4.1.c. SNAP-Ed indicators measured (Report Module 1, Page 3)

Review the SNAP-Ed Evaluation Framework indicators measured for this *project*.

4.4.1.d. Project sites (Report Module 1, Page 4)

Information on *project* sites is used to describe the geographic reach of SNAP-Ed efforts and the variety of sites in which SNAP-Ed was implemented. Provide the name of all sites where SNAP-Ed *projects* were conducted. For each site, indicate the setting type(s), whether the site is within a Tribal jurisdiction and the name of the Tribal Organization, the *intervention* approach(es) implemented, and the address. N-PEARS will automatically classify sites as urban, suburban, rural, or frontier based on the address. For information on how sites are mapped in N-PEARS visit the Mapping Sites to an Area Type webpage. *Social marketing campaigns* conducted in broader areas (i.e., not specific sites) will be described elsewhere in Report Module 1; those areas should not be reported as *project* sites.

4.4.1.e. Direct education (Report Module 1, Page 5)

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

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4.4.1.e.i. Stage

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

4.4.1.e.ii. Planning and development results

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

The following information is reported only for direct education interventions that were implemented.

4.4.1.e.iii. Languages

Select the language(s) in which the *direct education* was offered.

4.4.1.e.iv. Reach

Number of SNAP-Ed direct education participants (unduplicated)

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

New: For the *FY* 2024 reports due in January 2025 and for future reporting, *State* and *implementing* agencies should report direct education reach using the N-PEARS age category subgroups. If data are available by subgroup, agencies should report reach using the 5-17 age category subgroups as actual counts. If data are not available by subgroup, agencies should report reach among the 5-17 age category subgroups as estimated counts, determining approximate distribution of ages within the 5-17 age category subgroups.

The addition of age category subgroups is a change from previous reporting requirements that may require agencies to revise their current data collection methods. *State* and *implementing agencies* are reminded to make appropriate changes, if needed, to their demographic data collection methods when planning for *FY* 2025 to report actual reach using the 5-17 age category subgroups. **End of new material.**

When reporting on reach, the categories of age, gender, and ethnicity are mutually exclusive; the total number of people must therefore be the same when broken down by age, gender, and ethnicity. The racial categories, however, are not mutually exclusive. People may identify with more than one race, so the sum of all racial categories may be greater than the total number of unique individuals. **New:** On December 14, 2023, FNS published the SNAP: Revision of Civil Rights Data Collection Methods Final Rule, which prohibits using visual observation as a data collection method for race and ethnicity. **For SNAP-Ed, visual observation must not be used for data collection or reporting purposes if participants choose not to identify their race or ethnicity. End of new material.**

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Explanation of estimation method(s)

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

4.4.1.e.v. Mode of delivery

If *direct education* sessions are delivered in person or in a live online format, agencies should report the types of series offered (e.g., single sessions, series of two to four sessions) and the total number of sessions delivered in person and virtually. Virtual self-directed and *interactive media* may not have discrete sessions because content is designed for participants to complete at their own pace. Sessions are not required for virtual self-directed and *interactive media*.

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

4.4.1.e.vi. Behavior change (MT1: Healthy Eating, MT2: Food Resource Management, MT3: Physical Activity and Reduced Sedentary Behavior)

State and *implementing agencies* should collect data on changes or improvements to health behaviors targeted by their *direct education interventions* for each age group involved in the *intervention*.

State agencies are not required to track individuals over time to directly measure changes in their health behaviors. Agencies may draw inference about behavior change by comparing group-level data from before and after the *intervention*. These group-level data include averages for continuous measures (e.g., average cups of fruit consumed per day) and proportions for categorical measures (e.g., the number of people who drink sugar-sweetened beverages no more than once per week out of the total number of people who completed the health behavior assessment). Note that agencies with the capacity to track individuals from pretest to posttest may continue to do so; they are encouraged to take advantage of the strengths of linked data. For the purposes of reporting outcomes on these pages in N-PEARS, they should ignore the linkage. Agencies should only enter data collected that matches the SNAP-Ed Evaluation Framework outcome measure to promote cross-agency data aggregation. For example, if your survey combines fruit and vegetable intake, do not report on MT1 outcome measures. Instead, use the “other results” page to summarize the outcome measures you measured.

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

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Other outcomes should be reported as the number of individuals meeting SNAP-Ed health behavior reporting guidelines. These reporting guidelines are to be used exclusively for the purposes of SNAP-Ed reporting; they should not be used in place of dietary or other guidelines. See table 5 for the SNAP-Ed health behavior reporting guidelines on these outcomes. For guidance on using responses to common survey items to determine whether a health behavior meets the SNAP-Ed health behavior reporting guidelines, see the supplementary materials published by Ryan-Ibarra et al. (2020).[20]

Table 5. SNAP-Ed Health Behavior Reporting Guidelines

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

MPA = moderate physical activity; MT = medium term; MVPA = moderate-to-vigorous physical activity; VPA = vigorous physical activity

[a] The MyPlate Plan recommends daily intake for vegetables, fruits, grains, proteins, and dairy groups based on age, sex, height, weight, and physical activity level.

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

[20] Ryan-Ibarra, S., DeLisio, A., Bang, H., Adedokun, O., Bhargava, V., Franck, K., Funderburk, K., Lee, J. S., & Sneed, C. (2020). The US Supplemental Nutrition Assistance Program – Education improves nutrition-related behaviors. *Journal of Nutritional Science, 9*, E44. https://doi.org/10.1017/jns.2020.37

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State and *implementing agencies* should indicate the other MT1, MT2, and MT3 indicators measured among *direct education* participants. Future iterations of the N-PEARS *Annual Report* may provide formatted space to report these other MT1, MT2, and MT3 outcomes commonly measured in SNAP-Ed. In the current N-PEARS *Annual Report*; agencies may report these outcomes in the Section 4.4.1.i. Other Results (Optional) (Report Module 1, Page 9).

4.4.1.f. PSE Change Initiatives (Report Module 1, Page 6)

Agencies should report the *PSE* changes *maintained* and the *PSE* changes *adopted* with the support of staff and/or funding from SNAP-Ed. *PSE* changes *adopted* means at least one *PSE* change is made at the project site, and the change was not present at the start of the *FY*. Adoption does not mean full-scale implementation has occurred. *PSE* changes *maintained* means a *PSE* change is *adopted* at the project site before the start of the *FY* that SNAP-Ed funding or staff supported during *the FY.*

4.4.1.f.i. PSE Changes Maintained and Adopted

New: The SNAP-Ed Policy, Systems, and Environmental Change Initiative Data Toolkit supports agencies in accurately reporting their *PSE* change efforts. *PSE* changes are reported at the site level. For each site with a *PSE* change *maintained* or *adopted*, provide the following:

- **Estimated site reach.** For detailed guidance on estimating reach by various *PSE* change types and setting combinations, see Chapter 2 of the SNAP-Ed Policy, Systems, and Environmental Change Initiative Data Toolkit.
- **Type of PSE change maintained or adopted.** Select all *PSE* change types *maintained* or *adopted* for each site using the list of options provided in N-PEARS. Chapter 2 of the SNAP-Ed Policy, Systems, and Environmental Change Initiative Data Toolkit provides descriptions and examples of when a PSE change should be categorized as *maintained* or *adopted*. **End of new material.**
- **Description of PSE change.** Provide a brief description of each change made. If the same *PSE* change was *maintained* or implemented in multiple sites, use the same description.

4.4.1.f.ii. Active partners

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

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

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Chapter 2 of the SNAP-Ed Policy, Systems, and Environmental Change Initiative Data Toolkit includes examples of partners for each category type available in N-PEARS.

4.4.1.g. Social marketing (Report Module 1, Page 7)

For *social marketing campaigns* yet to be implemented, results focus primarily on *intervention* development. For *social marketing campaigns* that were implemented, results focus on *intervention* details and outcomes.

4.4.1.g.i. Stage

Begin by indicating the stage of implementation for the *social marketing campaign*. The type of information reported will depend on the stage of implementation.

4.4.1.g.ii. Planning and development results

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

4.4.1.g.iii. Implementation and evaluation stage results

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

Social marketing campaign details

For more information on providing *social marketing campaign* details, including detail on campaign scale, see Section 4.3.3.g. Social Marketing Campaign Scale (Plan Module 3, Page 7).

Market segments (MT12b)

For market segments (MT12b), indicate the number of *SNAP-Ed-eligible* individuals and the total number of individuals potentially reached. If the *social marketing campaign* was conducted in specific types of sites (e.g., schools), use the methods described above in Section 4.4.1.f. PSE Change Initiatives (Report Module 1, Page 6) to estimate site-level reach. If the *social marketing campaign* was conducted in a broader area (ZIP Codes, towns/cities), use Census Bureau data or other sources to provide the number of *SNAP-Ed-eligible* individuals and the total number of individuals where the *social marketing campaign* was conducted. Refer to Section 4.3.1. Plan Module 1: Target Audience and Needs Assessment for more detail on using these sources of population data. As in the *needs assessment*, 185 or 200 percent of the *FPL* may be used as a proxy for the *SNAP-Ed-eligible* population.

Impressions, reach, and engagement

Agencies are encouraged to report the estimated *SNAP-Ed-eligible* reach of their campaign by channel if reliable estimates are available or can be produced. *Social marketing* reach is the total number of unique individuals exposed at least once to campaign materials during the reporting year. Methods for determining reach depend on whether the channel is online

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(e.g., social media, digital advertisements) or offline (e.g., billboards, traditional media advertisements).

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

Table 6 provides a list of potential reach data sources by social marking channel.

Table 6. Potential Sources of Reach Data by Social Marketing Channel

Channel and Description	Potential Sources of Reach Data
Any channel	• Survey a sample of the *target audience* for recall rate; if several channels are used, ask which contributed to the recall; must weight by population data • If the advertisement directs viewers to a unique URL, Google Analytics (or another analytical tool) can be used to estimate reach
Traditional media advertisements Ads on broadcast or cable TV or radio	• Commercial data, usually purchased by larger stations, can be used to estimate reach
Billboards, transit advertising Outdoor billboards and interior/exterior transit advertising	• Vendors use formulas to estimate reach using impression data and *census tract* population data
Social media Organic, paid, or boosted posts	• Reach metrics are available for all social media platforms • Facebook and Instagram can deduplicate accounts across platforms
Digital media advertisements Ads on platforms such as online TV, YouTube, digital radio, podcasts, and websites	• Google Ads Manager can report reach based on cookies for up to 90 days • If an advertisement directs viewers to a unique URL, Google Analytics (or another analytical tool) can be used to estimate reach • Vendors may be able to provide other data to estimate unique reach
Websites Websites used only for campaign materials	• Google Analytics (or another analytical tool) can be used to estimate reach

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Channel and Description	Potential Sources of Reach Data
YouTube channel Channel displaying campaign materials as videos	• Unique viewers can be used to estimate reach for a 90-day period
Site-level assets Posters, banners, a-frames, recipe cards, etc.	• A percentage of the total promotional resources distributed can be used to estimate reach
Email updates Messages sent to a list of subscribers via email	• The number of individuals who open an email can be used to estimate reach

4.4.1.h. Indirect education channels (Report Module 1, Page 8)

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

4.4.1.i. Other results (optional) (Report Module 1, Page 9)

State and *implementing agencies* may use this space to provide results not already captured in Report Module 3. States can enter indicator data that was not otherwise captured in previous N-PEARS pages.

4.4.1.j. Priority populations (Report Module 1, Page 10)

Specify the priority populations for the *project* (age groups, racial groups, ethnic groups, gender groups, disability status). Priority populations should have been determined when planning the *project*.

4.4.1.k. Link project to SMART objectives (Report Module 1, Page 11)

Indicate the SMART objectives this *project* was designed to address.

4.4.2. Report Module 2: Evaluation Reports

State and *implementing agencies* that completed evaluations this year with dedicated evaluation staff (internal and/or contracted) should complete an evaluation report. Evaluations may include program data from more than one program year. An evaluation report is not required for standard *project monitoring*, which must be conducted for all SNAP-Ed projects.

> *State* and *implementing agencies* that completed formal evaluations complete Report Module 2. Formal evaluation is not required for all SNAP-Ed *projects,* and formal evaluations can take more than 1 year, so Report Module 2 will not be completed by all *State* and *implementing agencies*.

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4.4.2.a. Introduction (Report Module 2, Page 1)

Begin by providing the evaluation name, indicating the *project(s)* included in the evaluation and selecting the type(s) of evaluations conducted.

4.4.2.b. Design and summary (Report Module 2, Page 2)

4.4.2.b.i. Formative evaluation design

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

4.4.2.b.ii. Process evaluation design

For process evaluations, indicate the *project* components evaluated, the data collection methods, the data collection tools, the results and conclusions, and the use of the results. For process evaluation results and conclusions, consider the reach, adoption, implementation, and maintenance aspects of the RE-AIM Scoring Instrument and other implementation outcomes.[21]

4.4.2.b.iii. Outcome evaluation design

For outcome evaluations, indicate the *project* components evaluated, outcomes evaluated, any corresponding SNAP-Ed Evaluation Framework Indicators, the data collection methods, and the data collection tools. More information on the outcome evaluation will be provided in Section 4.4.2.c. below.

4.4.2.b.iv. Impact evaluation design

For impact evaluations, indicate the *project* components evaluated, outcomes evaluated, any corresponding objectives, the data collection methods, the data collection tools, the evaluation design, and the unit of randomization for randomized studies. More information on the impact evaluation will be provided in the next section.

4.4.2.c. Outcome and impact evaluation objectives, analysis, results, conclusions, and Dissemination Plan (Report Module 2, Page 2)

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

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

[21] For more information on other implementation outcomes, see Proctor, E., Silmere, H., Raghavan, R., Hovmand, P., Aarons, G., Bunger, A., Griffey, R., & Hensley, M. (2011). Outcomes for implementation research: Conceptual distinctions, measurement challenges, and research agenda. *Administration and Policy in Mental Health and Mental Health Services Research, 38*(2), 65–76. https://doi.org/10.1007%2Fs10488-010-0319-7

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

Next, summarize the evaluation results and conclusions. Begin this summary by providing data on *intervention* participation and the sample analyzed. For *intervention* participation, indicate the number of participants who received the intended *intervention* dose (e.g., completed a target number of *direct education* sessions). For the sample analyzed, describe why any individuals (or other analytic units) who were part of the study were not part of the sample analyzed (e.g., lost to follow-up). Then, provide quantitative and qualitative results for the SNAP-Ed evaluation performance indicators selected in Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan for the *projects* evaluated.

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

4.4.3. Report Module 3: Success Stories

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

4.4.3.a. Background (Report Module 3, Page 1)

Before providing the story, indicate the following:

- Short, descriptive title
- Name of the *activity* the story is about (can be a *project* or *nonproject activity*)
- Location of the story (region, county, Tribal jurisdiction, city, or neighborhood)
- Types of partners involved
- Site(s) or organization(s) involved in the story
- SNAP-Ed Evaluation Framework indicators related to the story

4.4.3.b. The story (Report Module 3, Page 2)

The story itself should describe what was done and the impact it had. Agencies can include quotes and file attachments (e.g., pictures, graphics, media coverage) to help illustrate these points.

4.4.4. Report Module 4: Challenges and Modifications from Plan

State and *implementing agencies* should complete Report Module 4 to describe major challenges implementing SNAP-Ed as planned, how the challenges limited progress toward the State priority

State and *implementing agencies* complete Report Module 4.

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goals, any modifications made or planned for the next *FY* to address the challenges, and potential solutions in the future to prevent or overcome the challenges.

4.4.5. Report Module 5: Coordination and Collaboration

4.4.5.a. Federal nutrition, obesity prevention, and health programs (Report Module 5, Page 1)

State and *implementing agencies* complete Report Module 5.

Indicate coordination and collaboration carried out with other Federal programs during the *FY* and the purpose(s) of the coordination and collaboration. Only significant coordination and collaboration with other Federal programs should be reported. To be considered significant, regular dialogue and information or resource sharing should have been ongoing. Only providing space for SNAP-Ed programming or distributing SNAP-Ed materials would not be considered significant coordination or collaboration. Agencies should retain all written agreements outlining roles and responsibilities of entities involved.

4.4.5.b. Multisector partnerships and coalitions (Report Module 5, Page 2)

Add multisector partnerships/coalitions to report on SNAP-Ed Evaluation Framework indicator ST8 results. For each multisector partnership/coalition added, provide a name for the partnership/coalition, the number of organizations involved by sector, the geographic level of the partnership/coalition, and a description of the key *activities* conducted with the partnership/coalition during the *FY.*

4.4.5.c. Tribes and Tribal Organizations (Report Module 5, Page 3)

Provide the following information for each Federal or State-recognized American Indian and Alaska Native Tribe or Tribal representative the agency consulted, coordinated, or collaborated with on SNAP-Ed planning and/or implementation:

- Name of the Tribe participating in the consultation
- Name and title of the primary contact
- Nature of planned consultation, coordination, and collaboration efforts, including staff time in *FTEs* and funding distribution to Tribe if applicable
- Brief description of the outcome of the consultation and how it will impact the State *SNAP-Ed Plan*
- Description of written comments received

4.4.5.d. Minority-Serving Institutions (Report Module 5, Page 4)

Provide the following information for each MSI the agency coordinated or collaborated with on SNAP-Ed planning and/or implementation:

- Name of the MSI
- MSI type (i.e., HBCU, HIS, TCU, AANAPISI)

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- Nature of coordination and collaboration including staff time in *FTEs* and funding distribution to MSIs if applicable
- Brief description of the key outcomes of coordination and collaboration during the *FY*

4.4.6. Report Module 6: SNAP-Ed Financial Reporting

State and *implementing agencies* complete Report Module 6.

State agencies will use Report Module 6 to provide a complete picture of their expenditures, including total expenditures associated with each *implementing agency* contract; expenditures for each *project* implemented by the *State agency*, if applicable; and all other direct expenditures. *Implementing agencies* will use Report Module 6 to provide a complete picture of their expenditures, including expenditures for each of the *implementing agency's* projects and all other direct expenditures. *State* and *implementing agencies* will report expenditures in a format similar to the budget (see Section 4.3.6. Plan Module 6: Planned Staffing and Budget); refer to the description of that module for additional detail on providing the information. Module pages are listed below.

4.4.6.a. SNAP-Ed project expenditures (Report Module 6, Page 1)

4.4.6.b. Other SNAP-Ed Expenditures (Report Module 6, Page 2)

4.4.6.c. Indirect costs (Report Module 6, Page 3)

4.4.6.d. Carry-over Expenditures (Report Module 6, Page 4)

4.4.6.e. Total agency expenditures (Report Module 6, Page 5)

4.4.6.f. Program income (Report Module 6, Page 6)

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

4.4.7. Report Module 7: Executive Summary

State and *implementing agencies* complete Report Module 7. Parts 2 and 3 of Report Module 7 are completed by *State agencies* only.

State and *implementing agencies* should summarize key successes of their programming in the executive summary. *State agencies* will also provide an overview of the SNAP-Ed *projects* and *activities* implemented across the State, including the reach of these efforts.

4.4.7.a. Key successes (Report Module 7, Page 1)

Describe key successes related to the SMART objectives and other important achievements from the *FY*. *State agencies* should describe key successes on the *projects* and *nonproject activities* they implemented, not those carried out by *implementing agencies*. All agencies should include key successes from work done by subcontractors.

4.4.7.b. SNAP-Ed projects and activities (State agencies only) (Report Module 7, Page 2)

State agencies will provide a summary of the *projects* and *activities* implemented. This narrative summary may be an update of the action plan overview from Section 4.3.2. Plan Module 2: SNAP-Ed Action Plan. It should describe how the work carried out across

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implementing agencies and *subgrantees* fits together to address the *target audiences'* needs, accomplish SMART objectives, and complement other programs in the State to support individuals and families with low incomes in improving their healthy eating and physical activity behaviors.

4.4.7.b.i. Reaching the target audience (State agencies only) (Report Module 7, Page 3)

Review the map of data from Section 4.4.1. Report Module 1: Project and Activity Results on the places SNAP-Ed was implemented. Also review the demographic characteristics of *direct education* participants and any available data on the demographic characteristics of those reached by *PSE* changes or *SM*. Use this information to describe the program's geographic breadth and demographic reach statewide across all *implementing agencies* and all *intervention strategies* (*direct education*, *PSE* change, and *social marketing*).

Then, review the identified gaps in program reach, access, and appropriateness from Section 4.3.1. Plan Module 1: Target Audience and Needs Assessment. Describe how the implemented *projects* addressed these gaps.

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Section 5: Appendices

Appendix A. Reorganization of Guidance Contents

New:

Table A.1. Reorganization of Guidance Contents

FY 2024 Guidance		Section Location in FY 2025 Guidance
Section Name	**Contents**	
Introduction	Purpose and structure of SNAP-Ed Plan Guidance, text box highlighting new content*	Section 1: Introduction to SNAP-Ed Plan Guidance
	Summary of Regulations and Background	Section 3.1. Summary of Regulations and Background
	Determining SNAP-Ed State Allocations	Section 3.1.1. Determining SNAP-Ed State Allocation
	SNAP Promotion Rule and SNAP-Ed	Section 3.1.2. SNAP Promotion Rule and SNAP-Ed
Section 1: Overview	Introduction to SNAP-Ed*	Section 2: Introduction to SNAP-Ed
	SNAP-Ed Goal	Section 2.1. SNAP-Ed Goal
	SNAP-Ed Focus	Section 2.2. SNAP-Ed Focus
	SNAP-Ed Guiding Principles	Section 2.3. SNAP-Ed Guiding Principles
	Sources of Nutrition and Obesity Prevention Guidance	Section 3.3.1. Sources of Nutrition and Obesity Prevention Guidance
	Approaches	Section 2.4. SNAP-Ed Approaches Section 3.3.2 SNAP-Ed Approaches
	Social Marketing Programs	Section 3.3.3. Social Marketing
	Policy, Systems, and Environmental Change Interventions	Section 3.3.4. Policy, Systems, and Environmental Change Interventions
	Evidence-Based Approach to SNAP-Ed	Section 3.3.5. Evidence-Based Approach to SNAP-Ed
	Comprehensive SNAP-Ed Projects and Plans	Section 3.2.1. Comprehensive SNAP-Ed Projects and Plans Section 4.1. Comprehensive Projects and Plans
	Coordination and Collaboration Requirements	Section 2.5. Coordination and Collaboration Requirements Section 3.4. Requirements for Coordination and Collaboration

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FY 2024 Guidance		Section Location in FY 2025 Guidance
Section Name	Contents	
	Collective Impact	Section 3.4.2. Collective Impact
	Management Evaluation Review of State SNAP-Ed Projects	Section 3.3.6. Management Evaluation Review of State SNAP-Ed Projects
	SNAP-Ed Roles and Responsibilities	Section 2.6. SNAP-Ed Roles and Responsibilities Section 3.1.3. Roles and Responsibilities
Section 2: Writing Your SNAP-Ed Plan and Annual Report	SNAP-Ed Plan and Annual Report Requirements	Section 3.2.2. SNAP-Ed Plan Overview and Requirements Section 3.2.3. SNAP-Ed Annual Report Overview and Requirements
	State Agency Liability	Section 3.1.4. State Agency Liability
	Record Retention Requirements and Management	Section 3.1.5. Record Retention Requirements and Management
	Timeline for Plan and Annual Report Submission and Approval	Section 3.2.4. Timeline for Plan and Annual Report Submission and Approval
	Instructions for Submitting the State SNAP-Ed Plan and Annual Report	Section 4.2. Instructions for Submitting the State SNAP-Ed Plan and Annual Report
	Guidelines for Developing the SNAP-Ed Plan	Section 3.2.2. SNAP-Ed Plan Overview and Requirements Section 4.3. Guidelines for Developing the SNAP-Ed Plan
	Guidelines for Developing the Annual Report	Section 3.2.3. SNAP-Ed Annual Report Overview and Requirements Section 4.4. Guidelines for Developing the Annual Report

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FY 2024 Guidance		Section Location in FY 2025 Guidance
Section Name	**Contents**	
Section 3: Financial and Cost Policy	State Agency Requirements	Section 3.5.1. State Agency Financial And Cost Requirements
	Federal Financial Participation and Allocation of Grants	Section 3.5.2. Federal Financial Participation and Allocation of Grants
	Fiscal Record-Keeping and Reporting Requirements	Section 3.5.3. Fiscal Record-Keeping and Reporting Requirements
	Allowable Costs	Section 3.5.4. Allowable Costs
	More Examples of Allowable and Unallowable Costs	Section 3.5.5. More Examples of Allowable and Unallowable Costs
	Financial and Cost Policy Supplement	Section 3.5.6. Financial and Cost Policy Supplement
Appendix A. Abbreviations and Acronyms	Abbreviations and Acronyms	Appendix B. Abbreviations and Acronyms
Appendix B. SNAP-Ed Plan and Annual Report Modules	SNAP-Ed Plan and Annual Report Module Summaries and Mockups	Section 3.2.2. SNAP-Ed Plan Overview and Requirements Section 3.2.3. SNAP-Ed Annual Report Overview and Requirements The mockups are no longer included in the guidance document. A static PDF of the SNAP-Ed Plan and Annual Report will be made available on SNAP-Ed Connection in FY 2024.
Appendix C. Supplementary Checklists and Templates	Reviewing State SNAP-Ed Plans Checklist	Appendix C. Supplementary Checklists and Templates
	Checklist for Evidence-Based Approaches	Appendix C. Supplementary Checklists and Templates
	Checklist for Public Health Approaches	Appendix C. Supplementary Checklists and Templates
Appendix D. SNAP-Ed Connection and SNAP-Ed Toolkit Websites	SNAP-Ed Connection	Appendix D. SNAP-Ed Connection Website
	SNAP-Ed Toolkit	Appendix D. SNAP-Ed Connection Website

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FY 2024 Guidance		Section Location in FY 2025 Guidance
Section Name	**Contents**	
Appendix E. Guidelines for Nutrition Education Materials	Guidelines for Duplicating or Editing SNAP-Ed Materials	Section 3.6. Guidance for Nutrition Education Materials
	Guidelines for Use of USDA and SNAP Logos	Section 3.6. Guidance for Nutrition Education Materials
	Nondiscrimination Statement Use	Section 3.6. Guidance for Nutrition Education Materials
	Credit	Section 3.6. Guidance for Nutrition Education Materials
	About Team Nutrition Materials	Appendix G. Nutrition Education Resources
	Start Simple with MyPlate	Appendix G. Nutrition Education Resources
	Food and Drug Administration Nutrition Label Educational Materials	Appendix G. Nutrition Education Resources
Appendix F. Definitions of Terms	Definitions of Terms	Appendix E. Definitions of Terms
Appendix G. SNAP-Ed Management Evaluation Guide	SNAP-Ed Management Evaluation Guide for State Agencies	Appendix F. SNAP-Ed Management Evaluation Guide for State Agencies
	SNAP-Ed Management Evaluation Guide for Implementing Agencies	Appendix F. SNAP-Ed Management Evaluation Guide for State Agencies

N/A = not applicable; PSE = policy, systems, and environmental

*Content at the beginning of a section that does not have its own heading for inclusion in the table of contents

End of new material.

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Appendix B. Abbreviations and Acronyms

AANAPISI	Asian American and Native American Pacific Islander–serving institution
AI/AN	American Indian/Alaska Native
BBCE	broad-based categorical eligibility
CAA	Consolidated Appropriations Act, 2021
CACFP	Child and Adult Care Food Program
CDC	Centers for Disease Control and Prevention
CDP	Census designated places
CEP	Community Eligibility Provision
CFR	Code of Federal Regulations
CNPP	Center for Nutrition Policy and Promotion
CSFP	Commodity Supplemental Food Program
DCA	Division of Cost Allocation
DGA	Dietary Guidelines for Americans
EBT	electric benefits transfer
EFNEP	Expanded Food and Nutrition Education Program
FDA	Food and Drug Administration
FDPIR	Food Distribution Program on Indian Reservations
FFY	Federal fiscal year
FNA	Food and Nutrition Act
FNS	Food and Nutrition Service
FPL	Federal poverty level
FTE	full-time equivalent
FY	fiscal year
GIS	Geographic Information Systems
HBCUs	historically Black colleges and universities
HHFKA	Healthy, Hunger-Free Kids Act of 2010
HHS	U.S. Department of Health and Human Services
HRSA	Health Resources and Services Administration
LEAs	local educational agencies
MCH	maternal and child health

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ME	management evaluation
MOU	memorandum of agreement/understanding
MSI	minority-serving institution
NCCOR	National Collaborative on Childhood Obesity Research
NERI	Nutrition Education Reinforcement Items
NIFA	National Institute of Food and Agriculture
N-PEARS	National Program Evaluation and Reporting System
NSLP	National School Lunch Program
OMB	Office of Management and Budget
OR DHS	Oregon Department of Human Services
OSU	Oregon State University
PAG	Physical Activity Guidelines
PII	personally identifiable information
PSE	policy, systems, and environmental
RE-AIM	Reach Effectiveness Adoption Implementation Maintenance
SEM	Social-Ecological Model
SNAC	State Nutrition Action Councils
SNAP	Supplemental Nutrition Assistance Program
SNAP-Ed	SNAP Education
TANF	Temporary Assistance for Needy Families
TCUs	Tribal colleges and universities
USDA	U.S. Department of Agriculture
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

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Appendix C. Supplementary Checklists and Templates

The Western Region developed the Checklist for *Evidence-Based Approaches* and the Checklist for *Public Health Approaches*. Other regions use these checklists to support States in the delivery of services. The checklists provide detailed descriptions, steps, and examples that may assist States as they consider approaches for delivery of *nutrition education and obesity prevention services*. The checklist for *Evidence-Based Approaches* has been fully integrated into the *SNAP-Ed Plan* and *Annual Report*, so it no longer exists as a standalone document.

1. Reviewing State SNAP-Ed Plans Checklist

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

1.1 Elements Considered When Reviewing SNAP-Ed Plans

General	Yes	No
Was the plan submitted in N-PEARS by August 15?		
Is the plan complete (all modules completed with sufficient details)?		
Is the plan signed by appropriate State representatives?		
Overall, does the plan seem reasonable, and will it accomplish the SNAP-Ed mission?		

Needs Assessment	Yes	No
Are the methods and sources used appropriate for the plan?		
Does the plan adequately define the audience and its needs?		
Does the plan identify other nutrition and obesity prevention programs serving *people with low income*?		
Does the plan identify areas that are underserved?		
New: Does the plan include and consider the needs of American Indian/Alaskan Native populations? **End of new material**.		

Goals and Objectives	Yes	No
Are the State goals and objectives consistent with SNAP-Ed Plan Guidance?		
Are objectives written in the SMART [specific, measurable, achievable, relevant, and time-specific] format?		
Do the objectives relate to the State goals?		
Do the activities target the SNAP-Ed-eligible audience?		
Are the activities adequately described?		
Are the activities supported by research?		
Are the activities consistent with Dietary Guidelines for Americans, MyPlate, and the Physical Activity Guidelines for Americans?		

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Goals and Objectives	Yes	No
Are materials to be used defined and appropriate?		
Is there justification for development of new materials (if any)?		
Is there a plan to capture behavior change (SNAP-Ed Evaluation Framework indicators)?		
Does the Plan incorporate public health approaches?		
Does the Plan demonstrate a coordinated approach using the Social-Ecological Model?		

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

Coordination Efforts	Yes	No
New: Did the State describe the required consultation that occurred with Tribes as it pertains to the SNAP-Ed Plan? *(if applicable)* **End of new material.**		
Are coordination efforts designed so duplication of efforts is eliminated?		

Staffing	Yes	No
Are administrative FTEs and program delivery FTEs appropriate for described activities?		
Do salaries relate appropriately to the work being performed?		

Budget	Yes	No
Is there a budget justification for all *Implementing Agencies*?		
Are costs reasonable and necessary?		
Are indirect costs limited to 26 percent for Federal reimbursement (applies to colleges and universities only)?		
Is an *indirect cost rate* agreement included?		

Assurances and Signatures	Yes	No
Are assurances and signatures included?		

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2. Checklist for Evidence-Based Approaches

The checklist for *evidence-based approaches* is now fully integrated into the *SNAP-Ed Plan* and *Annual Report*. An *evidence-based approach* for nutrition education and obesity prevention is defined as "the integration of the best research evidence with the best available *practice-based evidence*." Allowable uses of SNAP-Ed funds include conducting and evaluating evidence-based *direct education*, *PSE*, and *social marketing interventions*.

An *evidence-based approach* may include a mix of *strategies* (broad approaches to intervening on obesity prevention target areas) and *interventions* (specific set of evidence-based, *behavior-focused activities* and/or actions to promote healthy eating and active lifestyles). The SNAP-Ed Connection contains an interactive listing of peer-reviewed evidence-based *interventions* at various settings; for various target populations; and using the *direct education*, *PSE,* and *social marketing strategies*. This resource can assist with choosing evidence-based obesity prevention programs for SNAP-Ed.

2.1 Categories of Evidence-Based Approaches

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

Research-tested

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

- Color Me Healthy (North Carolina)
- Fresh Conversations (Iowa)
- Nutrition and Physical Activity Self-Assessment for Child Care (referred to as GO NAPSACC) (North Carolina)

Practice-tested

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

- Health Bucks (New York)
- Text2LiveHealthy (Colorado)

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Emerging

The approach includes community- or practitioner-driven *activities* that have the potential for effectiveness but have not yet been formally evaluated. Evaluation indices may reflect cultural or community-informed measures of success. Examples include the following:

- Eat Smart in Parks (Missouri)
- EatFresh (California)

For implementation purposes: There are different expectations for program implementers when choosing among research-tested, practice-tested, or emerging approaches. Research-tested programs, and some practice-tested programs, have existing guidelines, materials, and tools for implementers to use upon appropriate training on program delivery. For certain emerging programs, there may be a need for development and audience testing of new strategies and concepts, which may be cost prohibitive. For each of the following criteria, you can use the symbols to the right to help identify what is required, preferred, or possible.

Required Preferred Possible		Research Tested	Practice-Tested	Emerging
1	Use SMART (simple, measurable, attainable, realistic, timely) objectives			
2	Justify that the reach of the SNAP-Ed population warrants the cost of the intervention			
3	Justify the use of a novel or creative approach			
4	Use existing materials, implementation guides, and resources			
5	Conduct formative research, including audience testing			
6	Conduct a limited duration pilot test, and refine strategy			
7	Gain stakeholder input and put into place partnership agreements to support implementation and sustainability.			
8	Ensure facilities and support provided by partners are available on a consistent basis			
9	Train staff to implement the intervention			
10	Assess that staff have a clear understanding of the nature of the intervention, how it is being implemented, and their role			
11	Determine whether implementation occurs as intended			
12	Replicate across multiple populations and venues			
13	Evaluate outcomes with appropriate follow-up period based on program model			

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References

Baker, S., Auld, G., MacKinnon, C., Ammerman, A., Hanula, G., Lohse, B., Scott, M., Serrano, E., Tucker, E., & Wardlaw, M. (2014). *Best practices in nutrition education for low-income audiences.*

Brennan, L., Castro, S., Brownson, R.C., Claus, J., & Orleans, C.T. (2011). Accelerating evidence reviews and broadening evidence standards to identify effective, promising, and emerging policy and environmental strategies for prevention of childhood obesity. *Annual Review of Public Health*, *32*, 199-223.

Cates, S., Blitstein, J., Hersey, J., Kosa, K., Flicker, L., Morgan, K., & Bell, L. (2014). *Addressing the challenges of conducting effective Supplemental Nutrition Assistance Program Education (SNAP-Ed) evaluations: A step-by-step guide*. Prepared by Altarum Institute and RTI International for the U.S. Department of Agriculture, Food and Nutrition Service.

Kaplan, G.E., Juhl, A.L., Gujral, I.B., Hoaglin-Wagner, A.L., Gabella, B.A., & McDermott, K.M. (2013). Tools for identifying and prioritizing evidence-based obesity prevention strategies, Colorado. *Preventing Chronic Disease, 10*, 12027.

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3. Checklist for Public Health Approaches

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

3.1 Categories of Public Health Approaches

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

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

3.1.1 Policy

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

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

3.1.2 Systems

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

An example of a systems change is a local Food Policy Council creating a farm-to-fork system that links farmers and local distributors with new retail or wholesale customers in eligible settings. The local SNAP-Ed provider could be an instrumental member of this food policy council providing insight into the needs of the *priority population*.

3.1.3 Environmental

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

An example of an environmental change is a food retailer serving SNAP participants or other *people with low income* instituting in-store signage with free educational materials to encourage consumer selection of healthier food options based on the DGA and MyPlate. A SNAP-Ed provider can provide consultation and technical assistance to the retailer on preferred educational materials and positioning of signage to reach the *target audience* through this channel.

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

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

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

3.2 Examples of Policy, Systems, and Environmental Approaches

Examples of PSE approaches that complement direct or indirect nutrition education. Check the corresponding box for those that have the potential to fit your project. This list is not exhaustive; please write in other proposed approaches for review.	Yes	No
Use community- or place-based messaging to promote access and appeal for healthy foods, beverages, and/or physical activity.		
Use digital or social media to promote access and appeal for healthy foods, beverages, and/or physical activity.		
Mobilize community partnerships around healthy eating and active living.		
Develop wellness policies in schools or afterschool or child care setting sites that support children and family nutrition and health.		

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

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Appendix D. SNAP-Ed Connection Website

1. SNAP-Ed Connection

SNAP-Ed Connection is a resource website for SNAP-Ed administrators, *State agencies*, *Implementing Agencies*, educators, and others involved in the SNAP-Ed program.

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

1.1 SNAP-Ed Success Stories

Success stories from around the country are published on the website. All States are welcome to submit as many stories as they would like. States are encouraged to use the SNAP-Ed success stories tip sheet to write their stories. All stories should include evaluation and outcomes information. Stories are copyedited prior to publication.

1.2 SNAP-Ed Library

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

- Curricula
- Evaluation tools
- FNS resources
- SNAP-Ed Interventions (previously called SNAP-Ed Toolkit Interventions)
- Staff training materials
- State impact reports
- Success stories

It is a collaborative tool to allow States to share information so that there is no duplication of efforts across the program. **New:** FNS encourages State and local agencies to submit materials they have developed for consideration and inclusion in the SNAP-Ed Library. Resources such as State impact reports, staff training materials and success stories may be submitted at any time. Educational materials such as *interventions* and curricula may only be submitted during FNS's open *intervention* submission period. Details on these submission processes can be found in the SNAP-Ed Library. **End of new material.**

1.3 SNAP-Ed Connection Communications

New: The SNAP-Ed Connection e-bulletin delivers SNAP-Ed announcements and updates, nutrition and physical activity education messages tailored for SNAP-Ed-eligible audiences, information on new resources, and spotlights of SNAP-Ed programs from around the country. Subscribe at the FNS email subscriber service web page. Follow SNAP-Ed on X (Twitter) for SNAP-Ed-related messages and updates. **End of new material.**

1.4 Photo Gallery

The USDA Photo Gallery is a collection of copyright-free images that can be used in *social marketing campaigns*, brochures, and other SNAP-Ed materials.

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1.5 SNAP-Ed Program Administration Resources

New: On the Administration Page, States can review the SNAP-Ed Plan Guidance and other administrative resources, policies and reporting documents. States will find information on N-PEARS, funding allocations, and national and regional SNAP-Ed reports.

1.6 State SNAP-Ed Information

See the State SNAP-Ed Programs Page for State SNAP-Ed information, including State contact information, websites and State-developed materials housed on SNAP-Ed Connection. States should regularly check the agency information and inform their FNS Regional SNAP-Ed Coordinator if the information needs to be updated.

1.7 Trainings

The Trainings Page on SNAP-Ed Connection includes access to online webinars, courses, and other training material for *State* and *implementing agencies*. The various trainings provide guidance on program development, delivery, and evaluation as well as on equity and professional development. Continuing education credits are available for some trainings. FNS reviews all training material for potential inclusion on SNAP-Ed Connection. **End of new material.**

2. SNAP-Ed Toolkit

2.1 SNAP-Ed Interventions

New: In *FY* 2024, the *SNAP-Ed Toolkit* website was moved to SNAP-Ed Connection. The *interventions* from the *SNAP-Ed Toolkit* are now referred to as "SNAP-Ed interventions" in the SNAP-Ed Library. Additionally, *State* and *implementing* agencies can search the SNAP-Ed Intervention directory on SNAP-Ed Connection to identify and select evidence-based obesity prevention and *PSE* change *interventions* to include in *SNAP-Ed Plans*. These *interventions* help agencies comply with the requirement that State *SNAP-Ed Plans* must include *multilevel interventions* or *public health approaches* that reach households with low income most impacted by health disparities.

2.2 SNAP-Ed Evaluation Framework

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

End of new material.

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Appendix E. Definitions of Terms

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

New: *Adopted* means at least one *PSE* change is made at the project site, and the change was not present at the start of the *FY*. Adoption does not mean full-scale implementation has occurred. **End of new material.**

Allowable Cost refers to costs that are reimbursable from Federal program funds because they support SNAP-Ed and conform to Government-wide and SNAP-specific cost policy.

New: *Annual Report* is the official report that describes *project activities*, outcomes, and budget for the prior year's *SNAP-Ed plan*. This report is submitted annually to FNS by January 31. **End of new material.**

Applicant **New:** refers to a person who applies for SNAP benefits. **End of new material.**

Behaviorally Focused are those activities, interventions, objectives, and *strategies* that are related to (a) healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) other nutrition or physical activity issues; for example, encouraging breastfeeding practices; (c) the environmental impact of dietary practices, including safe food handling, promoting community walking groups; and (d) food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk.

Capital Equipment is nonexpendable property having a value of $5,000 or more per item at the time of acquisition. Capital equipment shall (7CFR §277 (OMB Circular A-87)) be inventoried and accounted for every 2 years by a physical inventory process. Capital equipment shall be disposed of in accordance with Federal property management requirements.

Census Tracts **New:** are small, relatively permanent statistical subdivisions of a county or statistically equivalent entity that local participants are invited to update prior to each decennial census as part of the Census Bureau's Participant Statistical Areas Program. *Census tracts* generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. *Census tract* data are useful in determining eligible locations for SNAP-Ed delivery. **End of new material.**

Child Nutrition Programs include the National School Lunch Program, the School Breakfast Program, the CACFP, the Fresh Fruit and Vegetable Program, the Summer Food Service Program, the Special Milk Program, and the Seamless Summer and the Afternoon Snacks Program.

Cognizant Agency refers to the agency that has been identified by OMB that is responsible for establishing *indirect cost rates*. For more information see *Indirect Costs*.

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Organization	Cognizant Federal Agency
State Public Assistance Agencies	Department of Health and Human Services (HHS)
All Other State agencies	Federal agency identified by OMB
Educational Institution	Department of Education, Department of Defense-Naval Research or HHS, depending on which provided more Federal funds over the last 3 years
Nonprofit Organization	Normally the Federal agency with the largest dollar value of award with the organization

Commodity Supplemental Food Program (CSFP) is the program that works to improve the health of *low-income persons* at least 60 years of age by supplementing their diets with nutritious USDA foods.

Direct education is an evidence-based, *behavior-focused* nutrition education and physical activity *intervention* conducted at the individual and interpersonal levels with an intensity and duration that supports behavior change and allows for active engagement in person, in a live online format, or through *interactive media*.

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

EFNEP is the *Expanded Food and Nutrition Education Program* of the National Institute of Food and Agriculture (NIFA), U.S. Department of Agriculture. EFNEP is conducted by Cooperative Extension, through a Federal, State, and local (community-based) financial partnership. It serves youth and families with limited financial resources in all States and U.S. Territories. 1862 and 1890 Land-Grant Universities provide State-level leadership for local programming. EFNEP employs paraprofessionals to deliver evidence-based, hands-on, interactive, and virtual lessons to participants. State and local EFNEP leadership also contribute to *PSE* change efforts through their Extension and University connections. EFNEP staff work collaboratively with SNAP-Ed staff to increase reach and facilitate improved nutritional well-being among populations with lower incomes nationwide. For more information on EFNEP and supporting resources, see the EFNEP website.

Emerging Strategies or Interventions are community or practitioner-driven *activities* that have the potential for effectiveness but have not yet been formally evaluated. *Emerging strategies or interventions* in SNAP-Ed require a justification for a novel approach and must be evaluated for *effectiveness*.

Evidence-Based approaches for nutrition education and obesity prevention are defined as the integration of the best research evidence with the best available *practice-based evidence*. The best research evidence refers to relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence. *Practice-based evidence* refers to case studies, pilot studies, and evidence from the field on nutrition education *interventions* that demonstrate potential for effectiveness. Evidence

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may be related to obesity prevention target areas, *intervention strategies*, and/or specific *interventions*. The target areas are identified in the 2020-2025 Dietary Guidelines for Americans. SNAP-Ed services may also include emerging strategies *or interventions*, which are community- or practitioner-driven activities that have the potential for effectiveness but have not yet been formally evaluated. *Emerging strategies or interventions* require a justification for a novel approach and must be evaluated for effectiveness. Intervention strategies are broad approaches to intervening on specific target areas. Interventions are a specific set of evidence-based, *behaviorally focused activities* and/or actions to promote healthy eating and active lifestyles. Evidence-based allowable use of funds for SNAP-Ed includes conducting and evaluating *intervention* programs and implementing and measuring the effects of *PSE* changes in accordance with SNAP-Ed Plan Guidance.

Fiscal Year (FY) is the Federal Fiscal Year (FFY) that runs from October 1 of one year through September 30 of the following year.

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

Food Distribution Program on Indian Reservations (FDPIR) provides USDA foods to income-eligible households living on Indian reservations and to Native American households residing in approved areas near reservations or in Oklahoma.

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

Grantee means the agency of the State responsible for administering SNAP. Federal funds are paid to this agency for all food costs and for 100 percent of all nonfood expenditures, including program administration and nutrition education. The *grantee* in turn takes agreements with local agencies (subgrantees) to conduct SNAP-Ed *activities*. Federal funds are made available to pay for 100 percent of all allowable nutrition education costs on a payment basis.

Implementing Agencies contract with *State agencies* to provide SNAP-Ed and include Cooperative Extension offices, universities, State departments of health or education, State level nutrition networks, *food banks*, and other organizations.

Impressions represent the total number of times content is displayed to an audience during a given period. This metric is commonly used in social marketing and readily available for most channels.

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Indirect Cost Rate is a rate typically computed by summing all indirect costs, then dividing the sum by the Modified Total Direct Costs. The resulting percentage is applied to each grant to determine its share of the indirect or overhead costs. Indirect cost rates applied in the *SNAP-Ed Plan* shall be documented through an indirect cost plan that is approved by a *cognizant agency*.

Indirect Education Channel or Indirect Channel is the distribution or display of information and resources, including any mass communications, public events (such as health fairs), and materials distribution, which involve no participant interaction with an instructor or multimedia.

Interactive Media is a mode of delivery of SNAP-Ed *direct education* that includes active participant interaction and engagement, is considered virtual in nature, and may be self-paced and/or self-directed. Instructors and participants are not in the same virtual space at the same time.

Interventions are a specific set of evidence-based, *behaviorally focused activities* and/or actions implemented to promote healthy eating and active lifestyles.

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

New: *Maintained* means a *PSE* change is *adopted* at the project site before the start of the *FY* that SNAP-Ed funding or staff supported during the *FY.* **End of new material.**

Management Evaluation (ME) is periodic assessment of the accomplishment of program objectives and compliance assessment of *State agency* and local program operations, including compliance efficiency, effectiveness, and quality of service, that results in a report that indicates ME findings, observations, and noteworthy initiatives. Observations are the identification of a program weakness or area needing improvement, which may involve management practices or an unregulated activity. Observations are associated with suggestions, which are statements of actions that address observations made in the *ME*. Noteworthy initiatives are projects and practices worthy of recognition that can be shared with other *State agencies* for replication and in an effort to improve program operations.

Means-tested Federal assistance programs are those that require the income and/or assets of an individual or family to fall below specified thresholds in order to qualify for benefits. There may be additional eligibility requirements to receive these programs, which provide cash and noncash assistance to eligible individuals and families. For SNAP-Ed the threshold is at or below 185 percent of the FPL except for State agencies that allow a higher gross income for SNAP eligibility, in which case the SNAP-Ed threshold matches that value (e.g., 200 percent).

Medical Nutrition Therapy Services means the assessment of the nutritional status of patients with a condition, illness, or injury (such as diabetes, hypertension, gout, etc.) that puts them at risk. This includes review and analysis of medical and diet history, laboratory values, and anthropometric measurements. Based on the assessment,

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nutrition modalities most appropriate to manage the condition or treat the illness or injury are chosen and include the following:

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

Medical nutrition therapy services are outside the scope of SNAP-Ed, and their cost is unallowable. Allowable SNAP-Ed *activities* focus on primary prevention of disease. Accordingly, they include *activities* to help the SNAP-Ed population to prevent or to postpone the onset of chronic disease by establishing more physically active lifestyles and healthier eating habits. By contrast, medical nutrition therapy is a secondary *intervention* that focuses on helping people already afflicted with the disease and its effects and to prevent additional disability. *Medical nutrition therapy services* are not allowable SNAP-Ed costs.

Multilevel interventions reach the *target audience* at more than one level of the *SEM* and mutually reinforce one another. *Multilevel interventions* generally are thought of as having three or more levels of influence.

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

Noncapital Equipment is property having a value of less than $5,000 per item at the time of acquisition. This equipment is generally treated as supplies and is not required to be included in any property management system. Treatment and disposition of nonexpendable equipment should be done in accordance with State or local property management requirements.

Nonproject activities are all efforts funded by SNAP-Ed other than *projects* that are designed to accomplish State priority goals and objectives. Examples include comprehensive *needs assessments*, general staff training (e.g., civil rights training), technical assistance, and peer-to-peer learning that benefit staff across multiple *projects*. Other examples include convening of coalitions, contracted services such as evaluation and formative research, and other *activities* not tied to a specific *project*.

Nutrition Education and Obesity Prevention Services are a combination of educational *strategies*, accompanied by supporting *PSE interventions*, demonstrated to facilitate adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants, individuals eligible to receive benefits under SNAP or other *means-tested Federal assistance programs*, and individuals residing in communities with a significant population with low income. Nutrition education and obesity prevention services are delivered through multiple venues, often through partnerships, and involve *activities* at the individual, interpersonal, community, and societal levels. Acceptable policy level *interventions* are

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activities that encourage healthier choices based on the current *Dietary Guidelines for Americans (DGA)*. *Intervention strategies* may focus on increasing consumption of certain foods, beverages, or nutrients as well as limiting consumption of certain foods, beverages, or nutrients consistent with the DGA.

Nutrition Security means all Americans have consistent and equitable access to healthy, safe, affordable foods essential to optimal health and well-being.

New: *Participant support costs* means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (not employees) in connection with conferences, or training projects (2 CFR §200.1). *Participant support costs* is one example of the type of compensation that SNAP-Ed-eligible individuals may receive as allowable by State and local policies. See Section 3.5.6.a.vi. Participant Compensation. **End of new material.**

New: *People with low income,* also referred to in 7 CFR §272.2(d)(2)(v) as low-income individuals, are people participating in or eligible for SNAP, as well as people with low financial resources defined as gross household incomes at or below the income threshold used for SNAP-Ed eligibility (185 percent of poverty or higher for State agencies that set a higher gross income limit for SNAP eligibility). **End of new material.** National School Lunch Program data on the number of children eligible for free and reduced-price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where *people with low income* reside, are examples of available data sources that can be used to identify populations with lower incomes. Participation in other *means-tested Federal assistance programs* may also be used as a proxy for low income since these individuals have gross family incomes below 185 percent of poverty.

Period of Performance means the total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. (2 CFR §200.77).

Policy, systems, and environmental (PSE) change initiatives for SNAP-Ed are *interventions* that have the potential to improve a community's health by making healthy food and physical activity choices more accessible, easier, and the default option. For more information, see Creating Healthy Local Places; Environmental Settings–Evaluation Framework; and Policy, Systems, and Environmental Change.

Poverty Guidelines are an administrative version of the Federal poverty measure and are issued annually by the Department of Health and Human Services in the Federal Register. Sometimes referred to as the FPL, poverty guidelines are often used to set eligibility for certain programs.

Practice-Based Evidence refers to nutrition education *interventions* that demonstrate potential for effectiveness based on case studies, pilot studies, and evidence from the field. Evidence from the field includes evidence from *emerging strategies and interventions*.

New: *Priority Population* is a segment of the *SNAP-Ed-eligible* population that the SNAP-Ed agency aims to reach through a specific *project.* **End of new material.**

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Project **New:** is defined as an *intervention* or a cluster of *interventions* or *activities* with common goals, intended outcomes, *target audiences* (e.g., youth), and implementation setting types (e.g., school). **End of new material.** Project activities include planning and reporting.

Project monitoring is required for all SNAP-Ed *projects*. It includes the collection and analysis of data on how the *project* was implemented (e.g., attendance at nutrition education sessions) and the outcomes the *project* was anticipated to affect (e.g., fruit and vegetable consumption). *Project monitoring* data are used to complete the SNAP-Ed *Annual Report.*

Public health approach as defined by CDC is a four-step process that is rooted in the scientific method. It can be applied to violence and other health problems that affect populations. The public health approach steps are define and monitor the problem; identify risk and protective factors; develop and test prevention *strategies*; and assure widespread adoption. These efforts affect a large segment of the population rather than targeting the individual or small group.

RE-AIM is a framework designed to enhance the quality, speed, and public health impact of efforts to translate research into practice in five steps:

- **Reach** your intended target population
- **Efficacy** or effectiveness
- **Adoption** by target staff, settings, or institutions
- **Implementation** consistency, costs and adaptations made during delivery
- **Maintenance** of *intervention* effects in individuals and settings over time

New: *Research-Based Evidence* refers to relevant rigorous nutrition and public health research, including systematically reviewed scientific evidence. **End of new material.**

SNAP Outreach is a SNAP functional area that provides information or assistance to individuals who might be eligible for SNAP in order to help them make an informed decision whether to apply for the Program. SNAP *State agencies* seeking Federal funding for outreach activities may annually submit an Outreach plan to FNS for approval. *SNAP Outreach* is not an allowable SNAP-Ed expense. However, SNAP-Ed agencies may communicate factual information pertaining to SNAP and refer participants to *SNAP Outreach* partners and/or to SNAP State and local offices for SNAP benefit information and assistance. *"SNAP Outreach"* should not be mistaken with "SNAP-Ed outreach." SNAP-Ed may conduct SNAP-Ed outreach activities to inform potential participants or community partners of SNAP-Ed nutrition education; *PSE* change; and *social marketing interventions*.

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New: *SNAP-Ed Approaches* are types of *intervention strategies*. There are three *SNAP-Ed Approaches*. Plans must include *SNAP-Ed Approach* One. Plans also must include *SNAP-Ed Approach* Two or Three; both may be included. (7 CFR §272.2(d)(2)(vii)(D))

- *SNAP-Ed Approach* One: Individual or group-based direct nutrition education, health promotion, and *intervention strategies*
- *SNAP-Ed Approach* Two: Comprehensive, *multilevel interventions* at complementary organizations and institutional levels
- *SNAP-Ed Approach* Three: Community and *public health approaches* to improve nutrition and obesity prevention

End of new material.

SNAP-Ed-eligible is a label that refers to the *target audience* for SNAP-Ed, specifically SNAP participants and *people with low income* who qualify to receive SNAP benefits or other *means-tested Federal assistance programs*, such as Medicaid or TANF. It also includes individuals residing in communities with a significant population with low income.

SNAP-Ed Plan is an official document that describes SNAP-Ed services States may provide. It should clearly describe goals, objectives, *activities*, procedures used, resources including staff and budget, and plans for any formal evaluations.

SNAP-Ed Target Audience **New:** includes SNAP participants, individuals eligible to receive benefits under SNAP or other *means-tested Federal assistance programs*, and individuals residing in communities with a significant (50 percent or greater) population with low income. *SNAP-Ed-eligible* is used in place of the *SNAP-Ed Target Audience* throughout the Guidance, unless referenced from another source. **End of new material.**

SNAP-Ed Toolkit is an obesity prevention toolkit of evidence-based *PSE* change *strategies* and *interventions* that are appropriate for the SNAP-Ed population. The Toolkit was developed by FNS in collaboration with NCCOR and CenterTRT and lists *strategies* and *interventions* for child care, school, community, and family settings and how to evaluate them. **New:** In March 2024, the *SNAP-Ed Toolkit* website, including the SNAP-Ed Evaluation Framework and Literature Review Database, were moved to the SNAP-Ed Connection. The *interventions* from the *SNAP-Ed Toolkit* are now referred to as "SNAP-Ed interventions" in the SNAP-Ed Library. **End of new material.**

Social-Ecological Model (SEM) illustrates how all elements of society, including individual factors (demographic factors, psychosocial, knowledge, and skills, etc.), environmental settings (schools, workplaces, faith-based organizations, food retail establishments, etc.), sectors of influence (government, industry, media, public health and healthcare systems, etc.), and social and cultural norms and values (belief systems, religion, heritage, body image, etc.) combine to shape an individual's food and physical activity choices, and ultimately one's calorie balance and chronic disease risk.

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Social Marketing, as described by CDC is "the use of marketing theory, skills, and practice to achieve social change, promote the general health, raise awareness, and induce changes in behavior."

Social Marketing Campaign is defined as a coordinated set of communications delivered to one or more SNAP-Ed market segments to a particular population across a large geographic area. It is typically branded, communicates a common call to action, is delivered in multiple complementary settings and channels, and focuses on one or more priority behavior changes. Please visit the social marketing page on SNAP-Ed Connection for additional information and examples of SNAP-Ed *social marketing*.

Soup Kitchen is a public or charitable institution that, as an integral part of the normal activities of the institution, maintains an established feeding operation to provide food to people experiencing homelessness on a regular basis.

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

Strategies are broad approaches to intervening on nutrition education and obesity prevention target areas.

Subgrantee means the organization or person to which a *State agency*, as *grantee*, takes an agreement to conduct nutrition education and obesity prevention *activities*. Federal funds pay the *grantee* for 100 percent its allowable costs. The *grantee* in turn generally will pay subgrantees for 100 percent of their *allowable costs*. The *subgrantee* is accountable to the *grantee* for the use of funds provided, and the *grantee* is accountable to FNS for the use of all Federal funds provided.

Target Audience: See *SNAP-Ed Target Audience*.

Team Nutrition is an initiative of FNS that supports the *Child Nutrition Programs* through training and technical assistance for food service, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity. Team Nutrition makes resources available to schools and child care at the Team Nutrition website.

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Appendix F. SNAP-Ed Management Evaluation Guide

1. SNAP-Ed Management Evaluation Guide for State Agencies

This checklist is used to review SNAP-Ed Programs during *Management Evaluations* of a *State agency (SA)* and may be helpful to States during the Plan development process. Please note this is not an exhaustive list of Federal regulations pertaining to SNAP-Ed. There may be other applicable regulations such as those specified in OMB guidance.

Citations	Checklist for Determining Compliance	Yes	No
7 CFR §272.2(d)(2)(i)	SA sets priority goals and objectives based on needs assessment findings. SNAP-Ed plan conforms to standards in the SNAP-Ed Guidance.		
7 CFR §272.1(c)(1)	Disclosure of information obtained from SNAP applicant households is restricted to persons directly connected with the administration or enforcement of the Food Stamp Act or regulations. – Data sharing agreements specify the data to be exchanged, procedures used to exchange the data, how data will be stored and who will have access, steps to be taken in case of a data breach, and how data will be securely destroyed. Participant information protected with encrypted servers.		
7 CFR §272.2(d)(2)(ii)	SA notifies applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities.		
7 CFR §272.2(d)(2)(iii)	SA describes methods used to identify its target audience that follow approved targeting strategies and supporting data sources included in the SNAP-Ed Guidance and alternate targeting strategies approved by FNS.		

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Citations	Checklist for Determining Compliance	Yes	No
7 CFR §272.2(d)(2)(iv)	SA has a valid, data-driven needs assessment on the nutrition, physical activity, and obesity prevention needs of the target population and the barriers to accessing healthy foods and physical activity. The needs assessment considers the diverse characteristics of the target population, including race/ethnicity, gender, employment status, housing, language, and transportation/ mobility needs.		
7 CFR §272.2(d)(2)(v)	SA ensures interventions are appropriate for low-income individuals eligible to receive SNAP benefits. Interventions recognize the population's constrained resources and potential eligibility for Federal food assistance.		
7 CFR §272.2(d)(2)(vi)	SA provides evidence-based nutrition education and obesity prevention services either directly or through agreements with IAs and community organizations.		
7 CFR §272.2(d)(2)(vii)(A)	SA uses the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan. SA provides oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts.		
7 CFR §272.2(d)(2)(vii)(B)	SA's SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports.		
7 CFR §272.2(d)(2)(vii)(B)	Activities are designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors.		
7 CFR §272.2(d)(2)(vii)(B)	Nutrition education and obesity prevention services are delivered through multiple venues.		

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Citations	Checklist for Determining Compliance	Yes	No
7 CFR §272.2(d)(2)(vii)(B)	Activities are delivered at the individual, community, and appropriate policy levels. Note, acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans.		
7 CFR §272.2(d)(2)(vii)(B)	All strategies and interventions are evidence-based.		
7 CFR §272.2(d)(2)(vii)(B)	Any research-based strategies and interventions reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence.		
7 CFR §272.2(d)(2)(vii)(B)	Any practice-based strategies and interventions reflect case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential. SA provides sufficient justification for the use of emerging strategies and evaluates all emerging strategies for effectiveness.		
7 CFR §272.2(d)(2)(vii)(C)	SA's SNAP-Ed activities promote healthy food and physical activity choices based on the most recent *Dietary Guidelines for Americans* and Physical Activity Guidelines.		
7 CFR §272.2(d)(2)(vii)(D)	SA uses SNAP-Ed Approach two and/or three in addition to SNAP-Ed Approach one: 1. individual or group-based nutrition education, health promotion, and intervention strategies 2. comprehensive, multi-level interventions at multiple complementary organizational 3. institutional levels; community and public health approaches to improve nutrition		
7 CFR §272.2(d)(2)(viii)	SA coordinates, and reports activities with national, State, and local nutrition education and health promotion initiatives and interventions.		
7 CFR §272.2(d)(2)(viii)	SA maintains copies of Memoranda of Agreement or Understanding with organizations it coordinates with for the provision of services.		

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Citations	Checklist for Determining Compliance	Yes	No
7 CFR §272.2(d)(2)(ix)	SA adheres to the approved operating budget for the FY under review.		
7 CFR §272.2(d)(2)(xi)	SA meets FNS fiscal recordkeeping and reporting requirements, including: – Reporting all SNAP-Ed expenditures on the Financial Status Report SF-425 – Collecting and reporting non-SNAP-Ed funding (i.e., planned public and private funding) contributions to the SNAP-Ed activities in N-PEARS		
7 CFR §272.2(d)(2)(xii)	SA provides additional information regarding the type of nutrition education and obesity prevention activities offered and the characteristics of the target population served to determine whether nutrition education goals are being met. SA periodically evaluates whether it's meeting State goals and objectives.		
7 CFR §272.2(d)(2)(xiii)	SA submits its SNAP-Ed Annual Report in N-PEARS by January 31st for the last FY's operations. Annual report describes SNAP-Ed Plan project activities, outcomes, and expenditures.		
7 CFR §272.2(e)(6)	SA submits its SNAP-Ed Plan in N-PEARS by August 15th.		
7 CFR §277.4(b)(5)(ii)	Information about SNAP enrollment excluded from billboards, radio, television, or video recordings.		
FNS Instruction 113-1	SA provides annual civil rights training for all SNAP-Ed agencies. Civil rights training is current and accurate. Civil rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance.		
FNS Instruction 113-1	Annual civil rights training is provided for all front-line personnel. Civil rights training is current and accurate.		

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Citations	Checklist for Determining Compliance	Yes	No
	Civil rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance. Civil rights training includes the nine mandatory topics (collection and use of data; effective public notification systems; complain procedures; compliance review techniques; resolution of noncompliance; requirements for reasonable accommodation for persons with disabilities; requirements for language assistance; conflict resolution; and customer service).		
FNS Instruction 113-1	SA monitors IA civil rights compliance as part of SNAP-Ed reviews. Civil rights reviews questions, or prompts are included on SA standard review forms.		
FNS Instruction 113-1	Nutrition education and related services are provided free from discrimination. Materials developed and used are appropriate for audience. In-person education is provided at accessible locations (convenient to public transportation, free parking, etc.) and on days/times that are convenient for audience participation. Bilingual staff are provided as needed; minimally, the presenter/education has a way to communication with all participants.		
FNS Instruction 113-1	Materials contain the required USDA non-discrimination statement in accordance with SNAP-Ed Guidance. If other statements are also used, they are listed separately, and the USDA statement is listed first.		
FNS Instruction 113-1	Most current SNAP non-discrimination poster, “And Justice for All,” is posted whenever and wherever SNAP-Ed services/education/ interventions are provided.		

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New:

Citations and Memorandum	Checklist for Determining Compliance	Yes	No
SNAP Memorandum on Tribal Consultation Requirements	SA engages in timely, meaningful, and substantive dialogue with the official leadership of Tribes, or their designated representatives, pertaining to elements of the SNAP-Ed Plans.		
SNAP Memorandum on Tribal Consultation Requirements	SA considers the needs of American Indian/Alaskan Natives living on and off reservations and makes efforts to include a focus and devotion of resources to Native nutrition education.		
7 CFR §272.2(b)(1)	SA implements SNAP-Ed in a manner that is responsive to the special needs of American Indians on reservations and consults in good faith with Tribal Organizations about portions of the SNAP-Ed plan pertaining to the implementation of the Program for members of the Tribe on reservations.		
7 CFR §272.2(e)(7)	SA consults on an ongoing basis with the Tribal Organization of an Indian reservation about those portions of the State Plan of Operation pertaining to the special needs of the members of the Tribe.		
7 CFR §281.2(b)	Tribes are given at least 30 days to provide comments in writing to the SA on the SNAP-Ed plan. The SA must, if appropriate and to the extent practicable, incorporate suggestions made by Tribes.		
7 CFR §281.2(b)	SA maintains records of consultations on State plans and ongoing consultations held with Tribes for review by FNS.		

End of new material.

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2. SNAP-Ed Management Evaluation Guide for Implementing Agencies

This checklist is used to review SNAP-Ed *implementing agency* programming during *Management Evaluations*. This may be helpful to States and *implementing agencies* during planning or for *State agencies* during their monitoring of *implementing agency* programming. Please note this is not an exhaustive list of Federal regulations pertaining to SNAP-Ed. There may be other applicable regulations such as those specified in OMB guidance.

Citations	Questions for Determining Compliance	Yes	No
7 CFR §272.2(d)(2)(i)	IA implements activities based on the State's priority goals and objectives. SNAP-Ed plan conforms to standards in the SNAP-Ed Guidance.		
7 CFR §272.2(d)(2)(ii)	IA notifies applicants, participants, and eligible individuals to the maximum extent possible of the availability of SNAP-Ed activities in local communities.		
7 CFR §272.2(d)(2)(iii)	IA describes methods used to identify its target audience that follow approved targeting strategies.		
7 CFR §272.2(d)(2)(iv)	IA uses the State's valid and data-driven needs assessment on the nutrition, physical activity, and obesity prevention and meets the needs of the target population and addresses barriers to accessing healthy foods and physical activity.		
7 CFR §272.2(d)(2)(v)	IA ensures that interventions are appropriate for low-income individuals eligible to receive SNAP benefits. Interventions recognize the population' constrained resources and potential eligibility for Federal food assistance.		
7 CFR §272.2(d)(2)(vi)	IA provides evidence-based nutrition education and obesity prevention services and delivers services either directly or through agreements with other local IA and community organizations.		
7 CFR §272.2(d)(2)(vii)(A)	IA uses the SNAP-Ed grant to fund the administrative costs of planning, implementing, and operating its program in accordance with its approved SNAP-Ed plan.		

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Citations	Questions for Determining Compliance	Yes	No
	IA provides oversight to ensure integrity of funds and demonstrate program effectiveness regarding SNAP-Ed outcomes and impacts.		
7 CFR §272.2(d)(2)(vii)(B)	IA's SNAP nutrition education and obesity prevention services include a combination of educational strategies accompanied by environmental supports.		
7 CFR §272.2(d)(2)(vii)(B)	Activities are designed to facilitate voluntary adoption of food and physical activity choices and other nutrition-related behaviors.		
7 CFR §272.2(d)(2)(vii)(B)	SNAP-Ed services are delivered through multiple venues.		
7 CFR §272.2(d)(2)(vii)(B)	Activities are delivered at the individual, community, and appropriate policy levels. Note: acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans.		
7 CFR §272.2(d)(2)(vii)(B)	All strategies and interventions are evidence-based.		
7 CFR §272.2(d)(2)(vii)(B)	Any research-based strategies and interventions reflect relevant rigorous nutrition and public health nutrition research including systematically reviewed scientific evidence.		
7 CFR §272.2(d)(2)(vii)(B)	SNAP-Ed activities consider emerging strategies or interventions that are community- or practitioner-driven. Practice-based strategies and interventions reflect case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential. All emerging strategies are justified for the use of a novel approach and evaluated for effectiveness.		
7 CFR §272.2(d)(2)(vii)(C)	IA's SNAP-Ed activities promote healthy food and physical activity choices based on the most recent *Dietary Guidelines for Americans* and Physical Activity Guidelines.		

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Citations	Questions for Determining Compliance	Yes	No
7 CFR §272.2(d)(2)(vii)(D)	IA uses two or more of the following approaches: 1. individual or group-based nutrition education, health promotion, and intervention strategies 2. comprehensive, multi-level interventions at multiple complementary organizational Institutional levels: community and public health approaches to improve nutrition		
7 CFR §272.2(d)(2)(viii)	IA coordinates and reports health promotion activities, initiatives and interventions with national, State, and other special supplemental nutrition programs including women, infant and children, the National School Lunch Program, Farm to School, and Food Distribution on Indian Reservations.		
7 CFR §272.2(d)(2)(viii)	IA maintains copies of Memoranda of Agreement or Understanding with organizations it coordinates with for the provision of services.		
7 CFR §272.2(d)(2)(ix)	IA adheres to the approved operating budget for the FY under review.		
7 CFR §272.2(d)(2)(xi)	IA meets FNS fiscal recordkeeping and reporting requirements.		
FNS Instruction 113-1	IA provides annual civil rights training for all front-line personnel. – Civil rights training is current and accurate. – Civil rights training is documented including lesson plan/topics covered, date of presentation(s), and staff in attendance. Civil rights training includes the nine mandatory topics: collection and use of data; effective public notification systems; complain procedures; compliance review techniques; resolution of non-compliance; requirements for reasonable accommodation for persons with disabilities; requirements for language assistance; conflict resolution; and customer service.		

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Citations	Questions for Determining Compliance	Yes	No
FNS Instruction 113-1	Nutrition education and related services/ benefits are provided free from discrimination. – Materials developed and used are appropriate for audience – In-person education is provided at accessible locations (convenient to public transportation, free parking, etc.) and on days/times that are convenient for audience participation – Bilingual staff are provided as needed; minimally, the presenter/educator has a way to communicate with all participants		
FNS Instruction 113-1	Materials contain the required USDA non-discrimination statement in accordance with the SNAP-Ed Guidance. If other statements are also used, they are listed separately, and the USDA statement is listed first.		
FNS Instruction 113-1	Most current SNAP non-discrimination poster, “And Justice for All,” is posted whenever and wherever SNAP-Ed services/ education/interventions are provided.		

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Appendix G. Nutrition Education Resources

1. Team Nutrition Materials

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

Under the *Team Nutrition* initiative, FNS provides numerous high-quality free educational materials for schools, child care, and summer meal sites that participate in *Child Nutrition Programs*. Materials developed under the *Team Nutrition* initiative utilize six communication channels:

- Food service initiatives,
- Classroom and child care activities,
- School-wide events,
- Home activities,
- Community programs and events, and
- Traditional and social media.

These channels offer a comprehensive network for delivering consistent and reinforcing nutrition messages to children and their caretakers. Social cognitive theory provides the theoretical framework for *Team Nutrition*, as this addresses personal, behavioral, and environmental factors that influence behavior.

Articles about the *Team Nutrition* approach include—

- The Story of Team Nutrition
- The Team Nutrition Pilot Study: Lessons Learned from Implementing a Comprehensive School-based Intervention

The development process for *Team Nutrition* materials includes the following:

- Review of peer-reviewed nutrition education literature
- Application of social cognitive theory and development of *behaviorally focused objectives*
- Formative research with the *SNAP-Ed-eligible* audience to test concepts, nutrition education messages, and images
- Alignment with educational standards, such as math, science, English, and health

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- Formative research of draft materials with the *SNAP-Ed-eligible* audience (e.g., piloting of materials in classrooms, focus group testing of parent/guardian materials, teacher and/or parent/guardian interviews)
- Review by child nutrition experts and stakeholders
- Review by U.S. Department of Agriculture and the Department of Health and Human Services via a Dietary Guidelines Work Group for consistency with the DGA and technical accuracy

Examples of *Team Nutrition* materials include:

- Grow It, Try It, Like It! (Pre-K)
- Discover MyPlate: Nutrition Education for Kindergarten
- Serving Up MyPlate: A Yummy Curriculum (Grades 1–6)
- The Great Garden Detective Adventure (Grades 3–4)
- Dig In! Nutrition Education from the Ground Up (Grades 5–6)
- Fueling My Healthy Life (Grades 6–8)

Child Nutrition Program operators may request free printed copies of *Team Nutrition* resources while supplies last. All are welcome to download these nutrition education materials at the Team Nutrition website.

2. MyPlate

CNPP's MyPlate is a modern, customizable approach to healthy eating based on the DGA. No matter your age, healthy eating is important. What you eat and drink matters. MyPlate is intentionally simple. It represents the amount from each food group to try to consume regularly over time, whether you eat on a plate, in a bowl, or another way.

MyPlate.gov offers a full range of free consumer-tested digital tools and resources, including personalized eating plans based on age, weight, height, sex, and activity level; recipes; tips for shopping; and more. All of these resources can be adapted to different lifestyles, cultural food preferences and dietary needs.

Consumers can follow MyPlate on X (Twitter), Facebook, Instagram, or get email updates through GovDelivery for nutrition tips, special campaigns, or health observances.

3. Food and Drug Administration Nutrition Label

FDA's Center for Food Safety and Applied Nutrition (CFSAN) has a wealth of educational materials that make it easy to understand and use the Nutrition Facts label, Menu Labeling, and other nutrition and food safety topics. Consumers, educators, teachers, dietitians, and health professionals are invited to check out CFSAN's many online resources, including downloadable and printable materials in CFSAN's Education Resource Library and on CFSAN's Nutrition Education page.

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