



Food and
Nutrition
Service

Park Office
Center

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Date: June 5, 2014

SUBJECT: Approval of Supplemental Nutrition Assistance Program Outreach Plans

TO: Program Directors
Financial Management Directors
All Regions

This memorandum sets forth Supplemental Nutrition Assistance Program (SNAP) State Outreach Plan approval policies. This guidance is based upon a similar memo regarding SNAP Employment & Training (E&T) Plans, issued May 30, 2012.

Starting in Fiscal Year (FY) 2015, the Food and Nutrition Service (FNS) will no longer provide conditional approval of State outreach plans. FNS has found that conditional approvals pose additional and unnecessary administrative burdens to State agencies and to FNS. Therefore, Regional Offices (ROs) should only approve outreach plans in full or in part. ROs should deny State outreach plans that are wholly unacceptable.

FNS will not release 50 percent Federal reimbursement funds to a State agency's letter of credit without an approved outreach plan in place. Further, State agencies cannot claim outreach reimbursements or draw from the State letter of credit without an approved outreach plan in place.

Please apply this guidance in the review and approval of FY 2015 plans, which are due August 15, 2014. Please share this guidance with your State agencies.

Annual Outreach Plans

State outreach plans for each fiscal year are due by August 15 of the prior year. To ensure plans are approved and implemented at the start of each Federal fiscal year (October 1), FNS encourages State agencies to:

- Submit plans early, but no later than August 15;
- Use suggested formats and any optional templates provided in the Outreach Toolkit;
- Be as short and concise as possible, while still being responsive to guidance in the Outreach Toolkit; and
- Consider submitting a multi-year outreach plan.

The SNAP Outreach Toolkit is located at the following link:
<http://www.fns.usda.gov/outreach/state-outreach-plan-guidance>.

Upon receipt of an outreach plan, the FNS RO has until September 30 to approve, deny, or request additional information. While most State agencies have their plans approved by October 1, some State agencies begin the new fiscal year without approval of all aspects of their plans. Additional clarifications are sometimes necessary due to lack of clarity, documentation, or essential information.

FNS will approve a plan in full, in part, or not at all. If only portions of the plan are approvable, FNS will approve those portions. FNS will no longer provide contingent approval as a valid approval option.

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

Plan Amendments

The State agency must submit plan revisions to its RO for approval prior to implementation of the planned activities. Prior approval is required when a plan amendment alters the nature or location of components.

Examples include:

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

Examples of Plan Submission and Approval Scenarios

1. *Approval of a Timely Received Plan* - The State agency submits an approvable plan on August 15 and the RO approves it on or before September 30. Cost reimbursement begins October 1.
2. *Approval of a Timely Received Plan Requiring Clarification* - The State agency submits a plan on August 15 that contains components that are not clear or not approvable. On September 30, the RO grants approval of the approvable components and invites the State agency to submit clarifying

information for the denied components. Cost reimbursement for the approved components begins October 1. Clarifying information is submitted to the RO on November 15. The RO reviews the clarifying information--as time allows--and approves the revised components of the plan on December 31. Full cost reimbursement begins January 1.

3. *Approval of an Untimely Submitted Plan* - The State agency submits an approvable plan on November 15. The RO reviews the plan as time allows and approves it on December 31. Cost reimbursement begins January 1.

4. *Approval of an untimely Submitted Plan Requiring Clarification* - The State agency submits a plan on November 15 that contains components that are not clear or not approvable. The RO reviews the plan as time allows and grants approval of the approvable components on December 31. Cost reimbursement for the approved components begins on January 1. With its partial denial, the RO invites the State agency to submit clarifying information for the denied components. Clarifying information is submitted to the RO on December 1. The RO reviews the clarifying information as time allows and approves revised components of the plan on January 31. Full cost reimbursement begins February 1.

If you have any questions about this memorandum, please contact Billy DeLancey at billy.delancey@fns.usda.gov or (703) 305-2480.

Sincerely,

A handwritten signature in black ink, reading "Lizbeth Silberman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lizbeth Silberman
Director
Program Development Division