

The Office of Analysis, Nutrition and Evaluation

Food Stamp Nutrition Education Systems Review

Final Report



United States
Department of
Agriculture

Food and
Nutrition
Service

September 2006

EXECUTIVE SUMMARY

I. Introduction

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) provides nutrition assistance as a food security safety net for eligible low-income households and individuals. Through these food assistance programs, FNS has also provided significant funding to States and local programs to provide nutrition education designed to help program participants and potential participants to choose healthy foods and active lifestyles.

In the Food Stamp Program (FSP), the largest of the nutrition assistance programs, States have the option to include nutrition education activities for food stamp participants and eligible non-participants as part of their administrative operations. The scope of food stamp nutrition education (FSNE) has expanded greatly since its inception. In 1992, only seven States offered USDA-funded food stamp nutrition education with Federal expenditures of \$661,000. In Fiscal Year (FY) 2004, Federal expenditures for FSNE were approximately \$147 million.¹ As with other FSP administrative costs, FSNE expenditures may be reimbursed at 50 percent.

Overview of Nutrition Education in the Food Stamp Program

The goal of food stamp nutrition education is to provide educational programs that increase, within a limited budget, the likelihood of recipients making healthy food choices and choosing active lifestyles. While the FSP has always had an option to conduct nutrition education, food stamp agencies are primarily designed to perform the administrative functions associated with food stamp benefits; typically, State and local food stamp offices do not have the staff or expertise to design and implement comprehensive nutrition education programs. Thus, “*State food stamp agencies*” or “*State agencies*” delegate this function, through formal contracts, to other providers of nutrition education within the State—the “*FSNE implementing agencies*.”

The State Cooperative Extension Service is the predominant type of implementing agency, but public health departments, public assistance agencies, university academic centers, and other types of organizations also provide FSNE. Implementing agencies, in turn, usually deliver nutrition education to food stamp recipients through local organizations, or “*local projects or subcontractors*.” Typically, local projects are local-level subdivisions of the implementing agency organizations such as a local cooperative extension office. Subcontractors are local-level entities, such as county health departments, that are independent of the implementing agency organizations and deliver FSNE services under contracts or agreements.

Implementing agencies may also develop collaborative relationships with community and private agencies, and other FNS-funded programs, referred to as “*program partners*” such as the Special Supplemental Nutrition Program for Women, Infants and Children (WIC).

To provide FSNE, State agencies submit an annual plan to FNS that describes the nutrition education activities to be conducted during the upcoming fiscal year along with a budget for those activities. In FY

¹ Federal expenditures totaled \$147 million as of November 2005 and were subject to change.

2004, all FSNE activities had to be compatible with the dietary advice provided in the *Dietary Guidelines for Americans* and USDA's *Food Guide Pyramid*. Approved plans are reimbursed at the level of 50 percent of the allowable costs expended, the same rate provided for other State FSP administrative functions.

Research Questions

This study examined FSNE operations in FY 2004 to address two objectives: 1) to provide a comprehensive and systematic description of nutrition education activities in the FSP, and 2) to identify patterns of program implementation with relevance for future FSNE planning. The key issues and questions addressed by this study are listed below.

1. ***Organizational Structure and Planning Process:*** What is the organizational structure of FSNE within States? To what extent and in what ways is FSNE coordinated with other FNS or other Federal and State nutrition education initiatives? How are State FSNE plans developed? To what extent are State plans implemented as intended?
2. ***FSNE Delivery:*** Who is/are the target audience(s) and what are their primary needs? What is the nutrition content focus of FSNE? To what degree do States rely on different educational delivery methods, and why? In what settings were nutrition education activities conducted? To what extent do State FSNE activities focus on providing information, promoting different attitudes, teaching specific skills, and trying out or practicing new behaviors? To what extent do FSNE participants recognize the link between FSNE activities and the Food Stamp Program?
3. ***Staff:*** What qualifications must FSNE providers meet? What amount of services is delivered by professional versus paraprofessional staff without formal nutrition credentials?
4. ***Monitoring and Evaluation:*** What kinds of records on FSNE participants and services are kept routinely? To what extent and how do States rely on research to make decisions about their FSNE target audience(s), content, and approach?
5. ***Funding:*** What is the total dollar value of resources directed to FSNE? How do the per-capita (recipient and FSP-eligible) costs vary across States? How many States spend more or less than the amount in their FSNE budget and why?

II. Study Methodology

Several data collection methods were used in this study to generate a comprehensive description of FSNE services along with in-depth, qualitative explanations of key issues of interest to FNS.

Data from States' FSNE Plan Documents and Expenditure Reports for FY 2004

The study team abstracted information from each State's approved FY 2004 plan and used the data to: 1) identify implementing agencies for the site visit sampling; and 2) familiarize the site visit interviewers

with the characteristics of the sampled agencies before the site visits. In addition, FNS provided State-level data on approved FSNE budgets and total expenditures for FY 2004.

National Web-Based Surveys of FSNE Agencies

Two web-based surveys were conducted, one involving all State agencies offering FSNE and the other involving all FSNE implementing agencies in FY 2004. Respondents included the State food stamp agency staff responsible for coordination of the State FSNE plan and budget, and persons involved in FSNE administration and fiscal management from the implementing agency. The final survey response rates were: 90 percent for implementing agencies (84 of 93 agencies), and 96 percent for State agencies (50 of 52 agencies).

On-Site Interviews with FSNE Representatives

Project staff conducted open-ended, in-depth interviews with FSNE officials at the State food stamp agencies, implementing agencies and their program partners, local project staff, and local program partners (if applicable). A systematic random sampling method was used to select implementing agencies for the on-site interviews—to ensure appropriate representation of agencies by organizational type, FSNE budget, and geographic distribution. Based on this sample of implementing agencies, the researchers purposively (not randomly) selected their associated State food stamp agencies, local projects, and partners for interviews during the site visits. The final number of interviews conducted were: 31 implementing agency interviews, 24 State-level partner interviews, 27 State agency interviews, 67 local project interviews, 43 local partner interviews, and 32 nutrition educator interviews.

Data Analysis

Data collected for this study were analyzed by: 1) quantitative analysis (e.g., frequencies, means, and percentages) of web-based survey data and financial data; and 2) qualitative analysis of interview data. This final report incorporates findings from the web-based surveys with narrative descriptions of the qualitative interview data. The interview data were used to flesh out the general profiles obtained from the survey data analysis with qualitative information on “how” and “why” certain decisions were made and with specific examples of FSNE operations.

III. FSNE Organizational Structure, Roles, and Responsibilities

The FSNE structure is multi-layered and includes the State food stamp agency, implementing agency, local projects, subcontractors, nutrition educators, and partners both at the State and local levels.

State Food Stamp Agency

Most States had either one implementing agency (60 percent) or two implementing agencies (28 percent). The number of implementing agencies by region ranged from a high of 16 agencies in the Southeast to a low of 7 agencies in the Mid-Atlantic.

The role of State agencies varied widely, depending on the activity and on the type of implementing agency. Results from the self-reported surveys show that although 28 percent were very involved in the selection of the target audience, and funding decisions related to implementing agencies, far fewer were very involved in message development (13 percent), identification of delivery methods or materials (11 percent), funding decisions related to local projects (15 percent), or selection of local projects (15 percent). While on average, 63 percent of State agencies characterized their involvement as “very active,” they were more likely to be very active with the local public health departments, emergency food providers, or tribal programs, and less active when the implementing agency was a university or a State or Territorial health department.

Implementing Agency

In FY 2004, 88 percent of implementing agencies described themselves as public organizations. The majority of all implementing agencies (55 percent) were Cooperative Extension Services (CES) of land grant universities. The remaining 45 percent represented a wide range of organizations, including a division of a State or Territorial health department (9 percent), an emergency food provider such as a food bank or pantry (8 percent), and a nutrition or public health school/department/college within a university (7 percent).

The implementing agency was the lead decision-maker in almost all FSNE activities. Implementing agencies developed the goals and objectives for FSNE, made funding decisions related to local projects and overall allocation of resources, trained nutrition educators, and conducted monitoring and evaluation to ensure that FSNE was implemented as intended. While most implementing agencies had local projects and/or subcontractors to provide direct and indirect education, they themselves implemented social marketing campaigns. If affiliated with a university, the implementing agency was more likely to conduct research projects that supplemented the work of the local projects or subcontractors.

Nutrition Networks

In FY 2004, 27 implementing agencies (33 percent) reported using a nutrition network to provide FSNE and coordinate it with other nutrition education. Of these, 67 percent (18 agencies) stated that the network was a part of a larger FSNE initiative. Only five agencies indicated that they had contracts with the State food stamp agency as a nutrition network independent of other FSNE activities.

The nutrition networks included a variety of State government, local government, and nonprofit agencies. The State agencies most often represented in these networks were the Cooperative Extension Service (89 percent), State food stamp agency (81 percent), emergency food providers (73 percent), and WIC program within the State health department (67 percent).

Local Projects, Subcontractors, and Nutrition Educators

Approximately 73 percent of implementing agencies used local projects (40 percent), subcontractors (19 percent), or both (14 percent) to deliver some or all of FSNE services. The choice to use local projects or subcontractors was associated with the type of implementing agency. Most of the Cooperative Extension Services used their county (local) extension offices to deliver FSNE; State or Territorial health departments tended to use subcontractors to deliver FSNE (87 percent).

Local projects and subcontractors typically felt that they were centrally involved in decision-making about the local implementation of FSNE services. Seventy-one percent of local projects and subcontractors reported that they made the decisions; 29 percent indicated that implementing agencies were responsible for decision-making. Key areas for local decision-making were: recruiting and selecting local partners, identifying the target audience, and developing content of nutrition education services. Based on guidance they received from the implementing agency about target populations, core nutritional messages, and acceptable methods of delivery, local projects felt they had the autonomy to make decisions that would be most beneficial to their community.

Implementing agencies relied on nutrition educators to provide direct education to clients, regardless of whether the educators were staff of the local project/subcontractor or the central implementing agency office.

FSNE Partners

The partnerships in FSNE were very diverse and extensive, at both the implementing agency and local levels. One-third of implementing agencies used an advisory committee or working group that provided input on policy decisions or helped establish coordinating mechanisms as part of FSNE planning and implementation. Among these agencies, the most commonly cited organizations were State Cooperative Extension Service offices and State and/or local health departments (73 percent and 69 percent, respectively). Three-quarters (73 percent) of implementing agencies coordinated FSNE activities with at least one U.S. Department of Agriculture (USDA), FNS food and nutrition assistance program, such as WIC, the National School Lunch Program, or Team Nutrition. The nutrition network partners provided another mechanism for coordination.

At the local level, partners typically provided access at their sites to low-income audiences for nutrition education. Local partners either operated independently in the community (e.g., a school district, a local food bank), were a local office of a larger State initiative (e.g., a local WIC office, a Head Start site), or associated with job training related to Temporary Assistance for Needy Families (TANF), family education, or self-sufficiency projects.

Local Food Stamp Offices

Nineteen percent of the local projects and subcontractors reported food stamp office involvement in FSNE planning or implementation. Food stamp office involvement usually consisted of distributing nutrition education brochures and materials. The primary barrier to their involvement in FSNE was limited personnel resources or physical space to direct towards nutrition education.

IV. FSNE Planning

FSNE plan development involves the following steps: 1) the implementing agency develops a plan, independently or together with local projects or subcontractors; 2) the State agency reviews the plan and works with the implementing agency to refine it; and 3) the State agency submits a single State FSNE plan to the FNS Regional Office for approval, as requested in the FSNE Plan Guidance.

Needs Assessment and Identification of Target Audience

Most implementing agencies (72 percent) reported that they conducted needs assessments for FSNE, but most of these assessments focused on identifying and locating low-income audiences, not their nutrition education needs. As recommended by the FY 2004 FSNE Plan Guidance, a majority of implementing agencies used existing data as the primary basis for needs assessment. They requested that State food stamp agencies provide FSP data, including participation data for all areas of the State and at the county level, or data on the demographic characteristics of participants (61 percent, 55 percent, and 45 percent, respectively).

In FY 2004, nearly three-quarters of State agencies asked implementing agencies to make food stamp recipients and applicants a high priority but allowed implementing agencies to target broader low-income populations. Only one State agency required implementing agencies to serve only food stamp recipients and applicants. The majority (52 percent) of implementing agencies targeted the low-income population with household income up to 185 percent of poverty as their primary audience in FY 2004. Slightly less than one-third of the agencies targeted FSP recipients and eligibles. Just 8 percent targeted only FSP recipients and applicants. The majority of implementing agencies used other demographic factors along with income in defining the target audience for FSNE, most commonly age (used by 65 percent of all implementing agencies), race and ethnicity (50 percent), and family status (39 percent). The demographics of the actual audience for FSNE are described in Section V.

Selection of Nutrition Education Curriculum and Topics

According to the FY 2004 FSNE Plan Guidance, the content of FSNE services must be science-based nutrition education intervention that is focused on health promotion and primary prevention of diseases through healthy diets and physical activities.

Selection of educational messages and curricula was based on past experience and on testing. A common practice was to use the messages and curricula that had been used for FSNE in the past.

In FY 2004, 71 percent of implementing agencies indicated that they tested some or all of their educational messages, commonly through methods such as focus groups with food stamp recipients or with other low-income audiences (43 and 52 percent, respectively).

Implementing agencies and local projects typically sought to increase participants' knowledge and to promote behavior change. The most commonly cited topics in local projects' nutrition education plans were: the importance of eating fruits and vegetables; nutritional quality of diets, food safety, the importance of physical activity, and food resource management.

Budget Development

In order to obtain FNS approval, proposed budgets were required to include detailed information to show that planned activities were allowable, planned expenditures were reasonable and necessary, and allowable non-Federal funding for 50 percent of expenses would be provided.

FSNE budget development activities in FY 2004 were conducted primarily by the implementing agencies and their local projects/subcontractors. Nearly two-thirds (63 percent) of implementing agencies with local projects or subcontractors provided a budget format for the local projects or subcontractors to prepare their own budgets. Implementing agencies also provided training and assistance to local projects on issues such as: how to interpret FSNE Plan Guidance, allowable costs, what qualifies for non-Federal FSNE funds, and how to develop partners.

About half of the local projects interviewed reported encountering problems during the process of budget development. The problems cited included: securing sufficient non-Federal funds, determining how to include private contributions, definitions of allowable costs, and finding adequate program space. In some of these cases, projects settled for less money than they had hoped for or eliminated some planned activities.

Approval of Local Project and Implementing Agency Plans

During the review of implementing agency and State plans, most implementing agencies and local projects experienced no problems. One in five implementing agencies with local projects or subcontractors denied funding for FY 2004 to a local project or subcontractor. The main reasons for these decisions were: local projects' inability to provide qualifying non-Federal contributions, insufficient plan documentation, and inconsistency between the selected target audience and implementing agency priorities. Only 8 percent of State agencies (four States) denied an implementing agency's request for FSNE funding. The reasons for denial included: the proposed FSNE activities were not consistent with priorities of the State agency, or the proposed activities duplicated services already underway or planned by another organization. Other reasons related to inconsistencies with the Federal FSNE Plan Guidance, such as: inclusion of an inappropriate target audience in the proposal, lack of appropriate non-Federal funds, and inclusion of non-allowable costs.

Conformance to the FSNE Plan Guidance and prior experience in FSNE were the most common criteria for States' approval of implementing agencies to be included in the State FSNE plan in FY 2004. Two-thirds of State agencies chose implementing agencies based on their prior experience. About one-third (34 percent) of the State agencies approved any potential implementing agency that submitted plans meeting the FSNE Plan Guidance requirements.

The majority of implementing agencies surveyed (88 percent) stated their FY 2004 FSNE plan was fully or mostly implemented as approved. Staffing shortages, shortfalls in non-Federal funding, and problems with partnerships were main reasons for the deviations in plan implementation. When there were deviations from the plan, the changes generally involved offering fewer classes or changing class locations, so changes rarely affected their service goals, messages, or delivery model.

V. Delivery of FSNE

In FY 2004 the four core areas of Improved Dietary Quality, Food Security, Food Resource Management, and Food Safety formed the conceptual framework on which implementing agencies based their activities. Within the context of the four core areas, implementing agencies typically emphasized multiple guidelines for their target populations: 98 percent of implementing agencies used

“Be physically active each day,” 99 percent used “Let the Pyramid guide your food choices,” and 99 percent used “Choose a variety of fruits and vegetables daily.”

Scope of Services

FSNE services were provided in most counties (82 percent) across States in FY 2004. Forty-two percent of State agencies reported that every county in their State was served.

In FY 2004, FSNE agencies did not collect or report participant demographic data using a standardized format or data management system. The implementing agency survey obtained these types of data, but the reporting was not consistent. While 89 percent of implementing agencies reported at least one demographic category, only one-third of agencies reported on all the demographic characteristics listed below.

According to the survey, FSNE served the following groups of participants in FY 2004:

Age. School-aged children (5–17 years) and adults (18–59 years) comprised the largest cohorts (42 percent and 36 percent, respectively) of FSNE participants, the remainder being elderly, young children, and infants.

Gender. Females constituted the majority of the FY 2004 FSNE participants; there were more than twice as many females as males (70 and 30 percent, respectively).

Race/Ethnicity. By race, 59 percent of participants were white, 23 percent were black/African-American, and 8 percent were American Indian/Alaskan Native. Approximately 20 percent of FSNE participants were identified as Hispanic or Latino (regardless of race).

Food Stamp Recipients. Just over half (51 percent) of FSNE participants were food stamp recipients or applicants, while 23 percent were income-eligible non-participants.

Coordination of Food Stamp Nutrition Education

Implementing agencies were most likely to coordinate with other agencies regarding information and data sharing (96 percent), plan development (88 percent), and message delivery (87 percent).

Development of FSNE budgets, program evaluation, and program monitoring were less likely to be coordinated. WIC and the Expanded Food and Nutrition Education Program (EFNEP) were most often coordinated with FSNE; they were most likely to be reported as “well” or “moderately” coordinated.

In FY 2004, 38 percent of implementing agencies had formal collaborative relationships with other nutrition education initiatives in their State to provide FSNE. Most common collaborators were State Departments of Education (45 percent) and other university or academic centers (39 percent).

Methods of Delivery

For purposes of this study, three FSNE delivery methods were defined: direct education, indirect education, and social marketing. (The reader should refer to the Key Word Definitions for these terms.)

The vast majority (98 percent) of implementing agencies provided direct education. The settings used for direct education included: public schools (81 percent), WIC clinics (75 percent), elderly services sites (73 percent), emergency food assistance sites (68 percent), and youth education sites such as YMCAs and preschools (66 percent). Multiple group sessions were the most commonly used mode for direct education in these settings.

Most (87 percent) implementing agencies also offered indirect education. These activities included distribution of print materials and public events such as health fairs (96 percent and 85 percent, respectively, of agencies using indirect education).

About one-third of implementing agencies conducted social marketing campaigns in FY 2004. Of those agencies, 48 percent conducted a Statewide campaign.

One of the key elements in a successful Statewide social marketing campaign was to involve multiple programs in reinforcing the message, and social marketing was strongly associated with nutrition networks. Of the 27 implementing agencies with a nutrition network, 17 employed social marketing. Only nine implementing agencies that did not have a nutrition network conducted social marketing. The most frequent channel of social marketing delivery was radio (62 percent), followed by television (46 percent), newspapers, and posters (each 42 percent). About a quarter of implementing agencies used mass distribution of materials through local food stamp offices for social marketing (27 percent). Almost half of the implementing agencies used four or more channels to deliver their social marketing.

Instructional Materials, Curricula, and Languages Used

Implementing agencies drew upon many different sources to obtain nutrition education curricula and materials. FNS was cited most often as the source for FSNE materials (77 percent). Other commonly reported sources included the implementing agency itself (75 percent), another implementing agency (74 percent), another USDA agency (71 percent), and another Federal organization (70 percent).

While almost all implementing agencies used some research-based curricula, there was wide variation in the specific curricula chosen. The most commonly used were Fight BAC (81 percent), Eat Smart, Play Hard (73 percent), and Nibbles for Health (47 percent). In addition, the FNS curriculum Power of Choice was used by 39 percent of implementing agencies; 27 percent reported using Changing the Scene, and 19 percent reported using YourSELF.

Almost all implementing agencies used two or more languages in FSNE service delivery; 28 percent used three or more languages other than English. Ninety percent of implementing agencies used materials or conducted activities in Spanish.

FSNE as a Benefit of the Food Stamp Program

While almost all State agencies (94 percent) viewed FSNE as one of the benefits of a Food Stamp Program, a smaller group (66 percent) actively promoted FSNE as a Food Stamp Program benefit. Similarly, 88 percent of implementing agencies *viewed* FSNE as one of the benefits of FSP, but somewhat fewer *identified* it to clients as a FSP benefit (78 percent). During interviews, implementing agencies and local projects described their hesitancy to “over-promote” FSNE as a part of the FSP. There were fears that associating with the FSP would be a barrier to client participation. In fact, many implementing agencies did not discuss the link with the FSP except on printed materials, because they perceived that members of the FSNE audience were sensitive to being associated with the FSP, whether they were recipients or not.

All stakeholders—implementing agencies, local projects, State agency, and partners—were quick to note that FSNE participants saw the local project or subcontractor as the provider of nutrition education rather than the FSP and that they may not have understood the link between FSNE and the Food Stamp Program.

This hesitancy towards closely tying FSNE to the FSP resulted in the perception by State agencies that participants were probably not aware of the link. Only 4 percent of State agencies believed that FSNE participants “very much recognized FSNE as a FSP benefit” (Exhibit A5-12). Instead they were more likely to think that FSNE participants “somewhat recognized” FSNE as a benefit (45 percent), had little recognition of FSNE as a benefit (35 percent), or had no recognition of FSNE as a FSP benefit (10 percent).

VI. FSNE Program Management and Evaluation

Successful management of FSNE services requires adequate staffing, monitoring of educational activities, and financial management. Another key to success for FSNE is evaluating the extent of program implementation and impact.

Staff Qualifications and Staff Training

In FY 2004, a majority (70 percent) of FSNE staff involved in direct service delivery had a Bachelor’s degree or higher. However, in general, nutritionists/dietitians and staff with a Master’s degree (totaling 40 percent) typically supervised nutrition educators rather than conducting educational activities, and the minimum educational requirement for nutrition educators was a high school diploma or GED. This suggests that nutrition educators were mostly staff with a Bachelor’s degree or less, constituting 59 percent of FSNE service delivery staff.

Most implementing agencies (83 percent) offered training to their staff and/or local project staff on a regular basis. Local project staff were uniformly satisfied with the amount of training their staff received.

Monitoring the Implementation of FSNE Activities

In FY 2004, all States collected some data on the number of clients served by FSNE, but the type of FSNE activity data collected varied across different service delivery methods—direct education, indirect education, and social marketing.

For direct education initiatives, most implementing agencies kept records in a way that allowed reporting of the number of individual participants, rather than the contact counts that were requested by the FY 2004 FSNE Plan Guidance. The most common way of reporting participation was to count the number of individuals who received FSNE service at least once during a reporting period regardless of how many times or classes the person participated (three-quarters of implementing agencies in 46 States).

The indirect education activities were most commonly tracked by counting the number of items (flyers, newsletters, etc.) distributed (73 percent of implementing agencies in 42 States).

Overall, 73 percent of the 26 implementing agencies using social marketing collected some type of data—usually multiple types—on the reach of the marketing campaign. For example, 58 percent of these agencies (in 15 States) tracked the number of times social marketing messages were delivered; 50 percent (in 12 States) recorded demographics of populations exposed to social marketing messages through media estimates of reach and placement.

Some State agencies have expanded their involvement in the monitoring of FSNE activities beyond the review of annual FSNE reports. Additional activities include: conducting on-site reviews of local FSNE projects (reported by 48 percent of implementing agencies in 21 States); interviewing the implementing agency staff (48 percent, 21 States); and holding regular meetings with the implementing agency (46 percent, 25 States). Overall, most implementing agencies felt that their monitoring system allowed them to meet State agency requirements.

Financial Management

Over one-half of States received audit reports on their implementing agencies' FSNE spending in FY 2004. Nineteen percent of States audited their implementing agency's FSNE financial records; while 23 percent received reports from internal audits conducted by implementing agencies, and one State commissioned an independent audit of its implementing agency.

Financial audits or reviews of FSNE spending were conducted for a large majority of local projects in FY 2004. Fifty-three percent of implementing agencies (in 28 States) used their staff to audit or review their local projects' finances. Ten percent of implementing agencies commissioned an independent audit (in six States); and another 10 percent reported that their local projects or subcontractors commissioned independent audits of their FSNE spending (in six States).

Evaluation

Overall, information collected in this study regarding FSNE evaluation was limited and ambiguous. In terms of formative evaluations, 71 percent of implementing agencies reported that they tested their

educational messages, using methods such as focus groups and interviews of food stamp recipients and other low-income groups. Nutrition educators further explained that, even when no formal method for assessing materials' effectiveness was in place, anecdotal feedback from participants provided them with useful information on the materials being used for FSNE.

Evaluation regarding implementation of nutrition education services consisted mainly of collecting monitoring data on social marketing and direct and indirect education services such as: the number and frequency of message delivery, and counts of participants in educational activities. Implementing agencies used these data primarily to satisfy their State agency's reporting requirements.

The majority of implementing agencies (74 percent) reported that they conducted outcome evaluations on at least some aspects of FSNE services in FY 2004. However, their explanations often did not distinguish between FSNE activity monitoring and outcome evaluations. Of the implementing agencies that were interviewed, staff from 17 agencies described their outcome evaluations. They suggested that these evaluations focused on behavior change among participants (outcome) and the extent of program utilization (process monitoring, e.g., the number of participants, the number of repeat contacts, and the number of events held). Seventy-seven percent of the implementing agencies interviewed indicated that their outcome evaluations were not conducted by an outside evaluator, raising questions regarding the reliability of findings from these studies. Implementing agency and local project staff described various factors as impediments for conducting outcome evaluations, such as difficulty in designing evaluation instruments and a lack of resources (either money or time).

Nonetheless, 50 percent of the implementing agencies interviewed believed that their outcome evaluations found positive behavior change among clients, and 66 percent felt that their data were reliable.

VII. FSNE Budgets and Outlays

Limitations of Data for the Financial Analysis

Although the survey requested financial data that all implementing agencies are expected to maintain, in the budget categories specified by the FY 2004 FSNE Plan Guidance, there were frequent gaps and inconsistencies in the data provided by the implementing agencies. Study staff resolved most of these problems, and total budget and outlay data were analyzed for 72 of the 84 implementing agencies that responded to the survey. (These 72 agencies formed the "final analysis sample.") There were, however, only 42 implementing agencies with usable data on the composition of FSNE outlays by type of expense, and 39 with usable data on the composition of outlays by source of funds, due to missing and inconsistent data. These more detailed outlay data are presented with more caution but they are nonetheless informative.

FY 2004 FSNE Budgets and Outlays

FNS approved FSNE plans totaling \$228 million in Federal funds for FY 2004. Based on implementing agency data collected for the study, State budgets for FY 2004 totaled \$242 million in non-Federal funds. Thus, the grand total budgeted from the implementing agencies' perspective was

\$470 million. Implementing agencies often obtain commitments from providers of non-Federal funds that exceed the requested amount of Federal funds, but they are entitled to claim reimbursement for 50 percent of allowable outlays.

Outlays for FSNE totaled \$295 million in FY 2004, including \$147 million in Federal outlays and \$148 million in non-Federal outlays. Among the States, the range was from \$20,000 to \$65 million, while the median total outlay of Federal and non-Federal funds was \$3.5 million.

On average across the Nation, total FSNE spending was \$12.39 per FSP participant, or \$3.62 per low-income person (with income below 185 percent of the Federal poverty level). States varied considerably in the level of FSNE spending relative to the size of the target population. The median FSNE outlay—the best descriptor of the “typical” State— was \$11.21 per FSP participant, with 25 percent of States spending less than \$5.83 per FSP participant and another 25 percent spending between \$19.40 and \$106.29.

Most State food stamp agencies did not view their internal FSNE outlays as large enough to justify the effort to separate them from general FSP administrative expenses. Only four State agencies reported their own staff time or other internal costs as a FSNE outlay. Two State agencies indicated plans to hire staff to oversee FSNE and claim these positions as FSNE expenses.

Half of the implementing agencies spent 90 percent or more of their budgets, according to the survey data. Most implementing agencies (81 percent) did not spend their entire budgets, but the percentage remaining tended to be relatively small. A few large implementing agencies had large amounts of unspent funds, skewing the relationship of budgeted funds (\$470 million) to outlays (\$295 million) at the national level.

When implementing agencies were unable to spend substantial portions of their budgets, common problems were cooperation of partners, staff turnover, and delayed start-up. A few implementing agencies indicated that they intentionally underspent their budgets, as a way to make sure they did not overspend.

Non-Federal Funds

Approximately one-third of non-Federal funds reportedly came from the implementing agency itself, and another one-third from State land-grant universities (according to data from the 39 implementing agencies providing complete and valid data on the sources of FSNE funds in FY 2004). Other sources of non-Federal funds included local public education agencies (10 percent in this sample), other public agencies (13 percent), private non-profit organizations (4 percent), and Indian Tribal Organizations (3 percent). State food stamp agencies provided 4 percent of reported non-Federal funds spent by implementing agencies on FSNE.

Several factors affected the amount of non-Federal contributions that were actually received from partners, including: partners’ interest; ability to prove that they served the target low-income or food stamp eligible population, availability of allowable funds, willingness to complete paperwork, budget cuts or changes in priorities at partner agencies, delays in startup leading to partners being unable to fit FSNE into their schedules (most often involving schools), and availability of space to provide FSNE.

Implementing agencies usually received non-Federal funds in the form of partners' contributions of staff time and other expenses in support of FSNE, not in the form of outright grants. Implementing agencies were eligible to claim Federal reimbursement for these expenses, but they did not pass on the reimbursement to the partners. Instead, they used these funds for other expenses that did not have non-Federal sources of funds. This approach is quite different from the way that most FSP administrative expenses are funded, with staff positions and other expenses supported jointly by Federal funds and by State and local revenue appropriated specifically for this purpose.

The amount of non-Federal outlays reported to FNS in some States may understate the full value of the contributions of non-Federal funds by implementing agencies and partners for approved FSNE activities. Although implementing agencies were allowed to claim Federal reimbursement for 50 percent of approved outlays, on average they reported spending more non-Federal funds than the amount of Federal funds claimed on their behalf. Constraints in financial processes at the State and implementing agencies affected the balance of Federal and non-Federal outlays. A key constraint was the implementing agencies' uncertainty about the actual amount of non-Federal funds that would be contributed by partners.

VIII. Comparison of FY 2004 FSNE Study Findings to the 2005 Guiding Principles

Implications for the FSNE Guiding Principles

On September 15, 2005, FNS released the "FSNE Guiding Principles," a policy document containing six overarching principles designed to provide the big picture and future direction for food stamp nutrition education. The document identifies standards of excellence towards which FSNE efforts should strive and delineates the roles and responsibilities of key stakeholders, including FNS, State food stamp agencies, implementing agencies, local offices/subcontractors and local food stamp offices. The Guiding Principles were first incorporated in the annual FSNE Plan Guidance issued by FNS for FY 2007 for operational implementation.

Although FSNE stakeholders did not operate under the Guiding Principles in FY 2004, a comparison of the study findings to the standards of excellence outlined in the Guiding Principles is useful. The comparison offers a baseline measure of how close FSNE operations in FY 2004 were to reaching the ideals of the Guiding Principles, recognizing that some programmatic changes may have occurred in the interim. The study data also identify some successful practices and potential barriers facing FSNE providers as they strive to meet these ideals in future years.

Guiding Principle 1: Food Stamp Nutrition Education is intended for Food Stamp Program recipients and individuals eligible for the Food Stamp Program.

Federal law and FNS regulations require that Food Stamp Program recipients and eligibles be the primary target of FSNE. Overall, the study findings indicate that FSNE providers make strong efforts to find and serve food stamp recipients. Nearly three-quarters of State food stamp agencies reported that they asked implementing agencies to make food stamp recipients and applicants a high priority. Implementing agencies estimate that just over half of FSNE participants are food stamp recipients, with an additional 23 percent being income eligible but not participating.

One of the challenges noted by State and local FSNE providers was that they have not been effective in identifying which FSNE participants are actually food stamp recipients. Where services were provided in sites such as a TANF work incentive program, a food bank, or in low-income housing centers, it was much easier to determine whether potential FSNE participants were eligible for food stamp benefits. Identifying food stamp recipients was not as easy, however, when services were provided in schools, at community events, or in general gathering places such as health fairs or in grocery stores.

Guiding Principle 2: FSNE is a set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition behaviors conducive to the health and well-being of individuals on a limited budget.

Most of the implementing agencies indicated that they use multiple elements of the Dietary Guidelines for Americans, and that they focus on both providing information and trying to promote behavioral changes. Interview data suggest that nutrition education was provided within the context of a client's limited budget. This study did not collect data on FSNE outcomes, but it did examine the efforts of implementing agencies to evaluate FSNE. Of implementing agencies that conducted outcome evaluations, a majority reported using in-person client interviews or surveys to collect data—typically self-report, pre-post data, including dietary recalls; and 50 percent found positive behavioral change. However, it is important to note that the quality of efforts designed to measure behavioral change was not examined.

Guiding Principle 3: FSNE has the greatest potential impact on the nutrition-related behaviors of the overall food stamp population when it targets women and children in food stamp-eligible households.

Agencies reported that most FSNE activities were directed at women and children. Implementing agencies indicated that 42 percent of FSNE participants were children and 25 percent were adult women. In addition, 81 percent of implementing agencies provided direct education to children in public schools, and 75 percent provided direct education in youth education sites such as YMCAs and preschools.

Guiding Principle 4: FSNE uses science-based behaviorally focused interventions and can maximize its national impact by concentrating on a small set of key outcomes.

There was considerable variation among implementing agencies in regard to use of science-based interventions. While most implementing agencies used tested materials, they often had not tested their messages with new target audiences. Implementing agencies using the social marketing approach were most likely to test their messages. Other implementing agencies conducted direct delivery with curricula that had either been tested in the past by their agency or by other FSNE providers.

Guiding Principle 5: FSNE can maximize its reach when coordination and collaboration take place among a variety of stakeholders at the local, State, regional, and national levels.

There were mixed results with regard to the coordination of nutrition education and collaboration among stakeholders. With regard to USDA-funded programs, as expected, almost all implementing agencies (84 percent) reported coordination of FSNE with WIC, and 81 percent reported coordination with EFNEP. Coordination with non-FNS funded entities was significantly less prevalent, with only 38 percent of implementing agencies reporting coordination efforts. About one-third (32 percent) used a nutrition

network as a formal coordinating mechanism. Most often, coordination was prevented by either a lack of interest on the part of either or both parties, or a lack of resources to promote coordination.

Levels of coordination also varied at the local level. Most local partnerships involved a partner agency that had access or provided services to the FSNE target population, such as a TANF job training program or a school located in a low-income area. Many local projects relied on their partners to provide the audience for FSNE and considered this arrangement to fall within the definition of local coordination.

Guiding Principle 6: FSNE is enhanced when the specific roles and responsibilities of local, State, regional, and national food stamp agencies and nutrition education providers are defined and put into practice.

The explanation of this Guiding Principle clearly identifies the expected roles and responsibilities of various constituents involved in FSNE. Implementing agencies, local projects and subcontractors, and program partners all played an active role in conducting FSNE in FY 2004, and were close to meeting the roles laid out under this Guiding Principle.

With regard to State food stamp agencies, there were mixed results. Since its inception, FSNE has been planned and delivered by agencies not affiliated with the State food stamp agency. Several State agencies had taken steps to expand their role from prior years in relationship to their implementing agencies, the FNS Regional Offices, and program partners. These State agencies were becoming more involved in the areas of FSNE program planning, administration, and monitoring. On the other hand, there were still some State food stamp agencies that saw FSNE as a pass-through and did not want to be involved.

Local food stamp office involvement also varied, with 46 percent of implementing agencies reporting having delivered FSNE at local food stamp offices in FY 2004. The primary uses of local food stamp offices were for one-time classes and distribution of educational materials. Most local FSNE providers reported that local food stamp offices lacked the resources, interest, or motivation to participate in FSNE. Even in some States where the State food stamp officials were highly involved in FSNE planning and implementation, there were challenges to convincing local food stamp offices to become involved in FSNE.

In summary, study findings indicated that striving to achieve the standards of excellence in the FSNE Guiding Principles will be relatively easy in some areas, while others will require a great deal of work.