



Food and Nutrition Service
Food Stamp Program
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FOOD STAMP PROGRAM STATE OUTREACH PLAN GUIDANCE



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Section A: Guidance

1. Introduction and Background

What is the purpose of this document?

This document provides guidance to State food stamp agencies for how to submit an outreach plan to the Food and Nutrition Service (FNS) for approval. It also explains how an outreach plan can be a valuable tool for State food stamp agencies. It provides policy that will be helpful to State food stamp agencies as they make decisions about the content of their outreach plans. It provides a template to use to develop and present an outreach plan. Finally, it provides resources and tools for developing a final report, reporting promising practices, and requesting a waiver.

State food stamp agencies have the option to conduct program informational activities (outreach) to inform low-income households about the availability, eligibility requirements, application procedures and the benefits of the Food Stamp Program (FSP) (*Section 11(e) (1) (A) of the Food Stamp Act of 1977.*) State agencies can receive fifty percent reimbursement for allowable administrative costs, including program informational activities, but not including recruitment activities (*Section 16 of the Food Stamp Act of 1977.*)

Outreach raises awareness of the nutrition benefits of food stamps, eligibility rules, and how to apply. Food stamp outreach corrects myths and misperceptions about the FSP and enables potentially eligible people to make an informed decision to participate. State agencies that conduct outreach activities are encouraged to submit an outreach plan to the appropriate regional office for review and approval.

Updates to this guidance will be made by FNS as needed via policy memorandum. Outreach policy memoranda can be found online at <http://www.fns.usda.gov/fsp/outreach/stateplan.htm>.

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

Outreach Can Help Increase Participation in the FSP Resulting in Multiple Benefits for Participants, States, and Communities: The FSP is the cornerstone of the Nation's nutrition safety net and an investment in our future. The FSP offers the opportunity for improved nutrition and progress toward economic self-sufficiency for participants who become stronger members of the community. However, too many low income people, especially seniors, working people, and legal immigrants, who are eligible for the FSP do not participate and thus forego assistance that could stretch their food dollars and help improve their nutrition. There were approximately 15 million individuals who were eligible for the FSP but did not participate in 2004.

Even a small increase in food stamp participation can have a substantial economic impact. If the national participation rate rose five percentage points, 1.9 million more low-income people would have an additional \$1.3 billion in benefits per year to use to purchase healthy food and \$2.5 billion total in new economic activity would be generated Nationwide. (State-by-state estimates are available at <http://www.fns.usda.gov/fsp/outreach/business-case.htm>.)

Economic Benefits for States and Communities:

Every \$5 in new FSP benefits generates \$9.20 in an additional community spending.

If the national participation rate rose five percentage points, 1.9 million more low-income people would have an additional \$1.3 billion in benefits per year to use to purchase healthy food and \$2.5 billion total in new economic activity would be generated Nationwide.

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

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

State Outreach Plans Facilitate Partnership Building and Networking: An outreach plan can serve as a public demonstration of the State's commitment to improving the nutrition and health of low income people. As the State agency begins to structure outreach activities into a plan, it can naturally lead to the development of partnerships with clearly defined strategies to further goals to raise awareness of nutrition assistance and the benefits of the FSP.

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

2. Outreach Plan Format and Submission

What format should my State agency use for the outreach plan?

It is an FNS corporate priority to increase FSP participation. In support of that goal, FNS encourages State agencies to develop outreach plans and submit them to the appropriate FNS regional offices for review and approval. FNS strives to make the outreach plan development and submission process as straightforward as possible for interested State agencies and to provide technical assistance in outreach plan development as needed.

To simplify the outreach plan development process for State agencies, an outreach plan template is provided in this guidance in Section C. The format is downloadable (at <http://www.fns.usda.gov/fsp/outreach/stateplan.htm>) so that it may be completed electronically. State agencies can use the template as a workbook and complete each part as instructed. When the template is complete, State agencies will have an outreach plan that includes all the elements needed for review and is ready for submission to the FNS regional offices.

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

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

It is highly recommended that the pages of the outreach plan be numbered consecutively, including the attachments. Number the cover page/signature page as page one. Limit the length of your outreach plan to the essential items.

The State food stamp agency must submit form **FNS-366A, Budget Projection Statement**, with the outreach plan for FNS approval. Report projected Federal funding for outreach on FNS 366A, line 16. Include this form with your outreach plan as an attachment. Please submit the original,

one hard copy and an electronic copy (in PDF or Word format) of the outreach plan and FNS-366A.

What information is included in the outreach plan template?

- **Cover Page/Signature Page:** Contains required signatures from the State Food Stamp agency director (or Commissioner) and fiscal representative and basic contact information. Number the cover page as page 1.
- **Statement of Need:** Provides a description of the need to conduct food stamp outreach within your State. Includes food stamp participation rates, the incidence of hunger and food insecurity and other relevant data. Include the source and date of the data.
- **Outreach Plan Summaries:** Provides an overview of the State agency's proposed plan activities. Assign a project number and title to each activity to serve as a reference throughout the outreach plan.
- **Outreach Project Details:** Provides more details on each outreach project including goals, timelines, roles of contractors and partners, and evaluation plans.
- **Outreach Project Staffing Summary:** Provides a listing of paid staff working on each outreach project. It includes the title of the employees and the amount of time spent on outreach. The project staffing summary is used to help build the project budget detail.
- **Outreach Project Budget Details and Narrative:** Provides both a line item budget and budget narrative for each project. The budget narrative describes how the figures in the line item budget were calculated in simple terms and provides a justification as to why each is needed. The budget narrative should be detailed enough to provide justification for all items on the line item budget. The outreach project budgets are used to build the budget summary.
- **Budget Summary:** Provides a budgetary overview of the entire outreach plan. The line item budget includes columns for non-Federal public funds, non-Federal, non-public funds, Federal funds and total funds. The rows are for the categories of expenditures that the State agencies will incur during implementation of the outreach plan, such as salary and benefits, copying/printing, telephone, equipment, supplies, space, travel, and contracts.
- **Assurances:** Provides documentation that an authorized representative understands key outreach plan obligations.
- **Attachments:** Includes your indirect cost rate agreement and the FNS 366-A form (budget projection.)

When should my State agency submit an outreach plan?

The FSP is funded annually on a Federal fiscal year basis, from October 1 to September 30. Submitting your plan to the appropriate FNS regional office no later than August 15 (7 CFR 272.2 (e)) assures that it can be reviewed in a timely manner and that your State can receive a full 12 months of funding for the upcoming fiscal year. States are encouraged to submit plans on this schedule whenever possible so that they can benefit from a full year's funding approval.

State agencies can submit outreach plans any time during the fiscal year. However, funds can only be obligated through September 30 of the current fiscal year. Therefore, plans that are

approved at other times during the year will not receive a full 12 months of funding for the current fiscal year. States may submit plans that cover more than one fiscal year but budgets are still approved on an annual Federal fiscal year basis. More information on multiple year plans is provided below.

If FNS determines that changes to the outreach plan are needed before final approval can be granted, the State agency must incorporate these changes into the outreach plan and resubmit the electronic version to FNS for additional review.

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

The outreach plan must contain an original signature of the State food stamp agency director (or Commissioner) and a State food stamp agency fiscal representative. The plan should be submitted to the FNS Regional Office as an electronic document (either as a Microsoft Word 2003 document or Portable Document Format (PDF) file) saved on a compact disc (CD.)

What reports are required?

The State agency must report outreach expenditures on SF-269 (Food Stamp). This report must be submitted 30 days after the end of each quarter. A final report is due December 31 of each year. Use Column 16, Outreach on SF-269 (Food Stamp) to report this information.

Outreach Plan Timeline for October 1 Start

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

A final narrative report is due December 31 following the completion of the outreach plan year. Please see Section C. Formats for Reports and Waiver Requests for a suggested format. Submit the report to the FNS Regional Office as an electronic document (either as a Microsoft Word 2003 document or as a Portable Document Format (PDF) file) saved on a CD.

Can the outreach plan cover more than one fiscal year?

With prior regional office approval, an outreach plan may cover up to three fiscal years. A multi-year outreach plan should have consistent goals over the length of the plan. Activities may be progressive, building on existing infrastructure and progress made over time.

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

In an outreach plan that extends more than one fiscal year, the following shall be submitted each year prior to August 15 for review and approval by the Regional Office before reimbursement may be drawn down for the next fiscal year:

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

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

If the scope of the outreach plan changes during the length of the plan, an amendment must be submitted for Regional Office for review and approval before reimbursement may be drawn down.

Can my State agency amend the outreach plan after approval?

If significant changes occur, amendments to approved outreach plans must be submitted for Federal approval before any reimbursement for these expenditures may be drawn down. Significant changes are:

- A change in the scope of activities; or
- An increase in the budget by 5 percent or \$100,000, whichever is less.

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

Amendments must be submitted **no later than May 1 of the current fiscal year** in order to ensure adequate time for review, approval and implementation of the proposed activities during the remainder of the fiscal year.

What is the State agency's responsibility after our outreach plan is approved?

The State food stamp agency is:

- Accountable for the contents of its outreach plan and for the subsequent implementation of the outreach plan;
- Responsible for making allowable cost determinations;
- Responsible for monitoring to ensure that outreach funds are spent appropriately;
- Liable for repayment of Federal funds should costs later be determined unallowable; and
- Responsible for technical assistance to any contractors to ensure that all projects support the State agency's outreach goals and to explain which expenses are eligible for reimbursement.

How can my State agency expedite the approval of our outreach plan?

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

- Review this guidance carefully before developing your outreach plan;
- Review your outreach plan carefully to ensure consistency with this guidance and any subsequent policy memoranda. Both State agency program staff and the fiscal officer should review the outreach plan to verify that all activities and costs are allowable, reasonable and necessary;

- Construct necessary waiver requests carefully and provide thorough justification and documentation using the standard FSP waiver form found in Section E: Formats for Reports and Waiver Requests;
- Use the template provided which is designed to ensure that necessary information is included and clearly presented in your outreach plan;
- Limit your State outreach plan to the essentials. For ease of development and review, it is suggested that you use at least a twelve-point font, single space, one-inch margins and number the pages of your outreach plan consecutively starting with the cover page as page 1.
- Provide clear and concise descriptions and justifications for requested items;
- Review the accuracy of your budget carefully to check for math errors;
- Ensure that the appropriate State food stamp agency officials review the outreach plan (including the budget), approve, sign and date the outreach plan;
- Submit your outreach plan to your FNS Regional Office early (prior to August 15th); and
- Submit the previous year's final report to your FNS Regional Office by December 31.

Who can my State agency contact for help developing our outreach plan?

FNS Regional Office program and financial management staff are available to provide technical and other assistance to State agencies in developing outreach plans.

Section B: Policy

1. Allowable Activities

What outreach activities are allowable for reimbursement under the FSP?

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

The following are **examples** of allowable outreach activities:

Allowable Activity	Example
Eligibility pre-screening	Use of a paper or electronic tool to inform potential applicants that they may be eligible and potentially, how much they could receive.
Application assistance	Assistance completing the application, including delivery of the application to the local food stamp office.
Assistance obtaining application verification documents	Informing potential clients which documents may be needed and making copies of verification documents.
Information dissemination in locations where low income people gather	Distribution of information at the employers of low wage workers.
Outreach exhibit or booth at community event	Set up and staffing of outreach booth at the annual community fair.
Conducting outreach workshops with community organizations at their locations	Food stamp outreach fair at a senior center.
Placement of advertisements on radio, television, print or electronic media.	Purchase time for FSP advertisements on the local radio station.
Production and distribution of public service announcements (PSA) to radio, television, print or electronic media	Distribute of USDA produced television PSA to local cable company for airing as a public service.
Toll free information line to provide information to potential clients	A Statewide 1-800 information number for potential clients to connect to their local office.
Development of printed educational or informational materials for clients	Development and printing of a brochure outlining the benefits of participation in the FSP.
Use or customization of FNS outreach materials for clients	Hiring a graphic shop to customize and print the FNS posters with the phone number of the local office.
Training or train-the-trainer programs for FSP outreach workers	Training of local community partners to run outreach seminars by the primary outreach contractor.
Translation of materials and bilingual accommodation to convey eligibility requirements and assist persons with limited English proficiency during the application process	Translation of an outreach envelope into the predominant non-English language in the community.
Program access activities	Reminder calls to enrolled clients regarding their recertification responsibilities.

What outreach activities are prohibited from outreach plans?

The following activities are prohibited regardless of the source of funding:

- Interfering during the certification interview or at other times to campaign on behalf of specific applicants or recipients, however, outreach workers may be present to provide support or help explain complicated terms; and
- Recruitment of individuals to participate in the FSP. Recruitment is defined as an activity intended to persuade an individual who has made an informed choice not to apply for food stamp benefits to change his or her decision.

FNS encourages State agencies to strengthen their impact by including a **combination of reinforcing and supportive activities** in their outreach plans.

For example:

- Pre-screening is helpful in raising awareness of eligibility but pre-screening and application assistance together can encourage the client to take the next step to apply.
- A toll free number provides a central place of information but public service announcements promoting that number ensure that people know about it.

What outreach activities are allowable provided they are not supported by Federal funds?

These activities are not reimbursable with Federal funds under the FSP, although they may be funded through other mechanisms.

- Acting as an authorized representative for applying, receiving FSP benefits at issuance, or food purchasing; and
- Transportation of clients to or from the local food stamp office or provisions of tokens, vouchers or similar items for transportation of clients to or from the local food stamp office. For example, a transit agency could donate bus vouchers for use by potential food stamp clients to travel back and forth to the local food stamp office at no expense to the State agency.

Should nutrition education activities be included in the outreach plan?

Nutrition education activities are supported through a State nutrition education plan and therefore should not be included as major components in an outreach plan. The primary purpose of the outreach plan is outreach. However, because outreach promotes the nutrition benefits of food stamps, your outreach plan may include a very minimum amount of nutrition education and nutrition messages, as long as the primary purpose and focus of the plan remains outreach. For example, you may use messages that promote participation in the FSP as a means to buy more nutritious foods for your family.

Should a contingency plan for outreach during a disaster be included in the outreach plan?

A State outreach plan may include contingency plans for food stamp outreach during a disaster. Planning ahead is critical to adequate disaster response. State agencies should have plans in place for how they will reach out to the victims of a natural or man-made disaster to let them know about the availability of a Disaster Food Stamp Program (DFSP.) Allowable outreach activities during a disaster include distribution of information about the provisions of the DFSP to disaster victims; distribution of information to media outlets to let disaster victims know where and how to

apply for DFSP assistance; and translation of such information into other languages. Such plans can be included in the budget for planning purposes but are only put into place when needed.

2. Funding

What is the funding structure of a State outreach plan?

State food stamp agencies are reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved activities (*Section 16 of the Food Stamp Act of 1977, as amended.*) Outreach is an allowable administrative cost to the FSP.

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

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

The State agency must **maintain records for three years** to support costs claimed (*7 CFR 277.4(c) (d) (e).*)

Federal reimbursement is subject to the availability of Federal funds.

What is the timeline for reimbursement of expenditures?

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

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

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

3. Sources of State Agency Funding

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

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

What is a non-Federal public agency?

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

- **In-kind donations from public agencies (7 CFR 277.4(e).)** The donation of goods and services by a public entity to the State agency results in a de facto State agency expenditure or outlay and is thus considered reimbursable.

What is an in-kind donation?

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

What sources of funding can not be used for State agency expenditures?

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

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

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

1. No endorsements of donors or products will be given.
2. No funds will revert back to donor or benefit the donor.
3. Funds are donated without restriction on use for a specific person, institution, or facility.
4. Funds are under the State agency's administrative control.

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

Only private cash donations to the State agency from third parties not operating under a formal agreement with the State agency to provide local FSP services are relevant to this section. Funds held by a subgrantee (contractor) of the State agency under contract to deliver FSP services are not considered private cash and need not be "donated" to the State agency in order to be expended for FSP purposes or reimbursed by FNS. Rather, this funding should be considered a financial resource of the contractor. Consistent with the State outreach plan, the State agency contractor may spend the cash it holds on approved outreach activities, and submit its billings to the State agency. Then, the State agency may seek reimbursement for such expenditures from FNS and reimburse the contractor under the terms of the contract.

Private Cash: An Example

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

- **Private in-kind donations.** An in-kind donation by a private entity is not considered a State agency expenditure; therefore, it is not considered a cost and is not reimbursable. No waiver is available that would allow for private in-kind donations to be used. Examples of private in-kind donations are space, equipment, and volunteer time from private entities such as community and faith-based organizations, and food banks or pantries (7 CFR 277.4.)

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

4. Cost Policy

How should my State agency determine if costs are appropriate?

All costs must be **allowable, reasonable, and necessary**. All costs reimbursed by FNS must be valid obligations of the State agency, local government or sub-grantee (contractor).

OMB regulations, Departmental rules, and FSP rules define what costs are **allowable**.

Reasonable costs are those that:

- Provide a program benefit generally commensurate with the amount incurred;
- Are in proportion with other program costs for the function; and
- Have a high priority relative to other demands.

Where can I find the rules and regulations?	
OMB regulations:	2 CFR 225 (OMB Circular A-87) 2 CFR 220 (OMB Circular A-21) 2 CFR 215 (OMB Circular A-110) 2 CFR 230 (OMB Circular A-122)
Departmental rules:	CFR 3016
FSP rules:	CFR 277

Necessary costs are those that:

- Are needed to carry out essential functions;
- Cannot be avoided without adverse impact on program operations; and
- Do not duplicate existing efforts.

What administrative expenses are allowable?

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

Allowable administrative expenses include:

- Salaries and benefits of personnel involved in outreach and administrative support;
- Office equipment, supplies, postage, duplication costs and travel necessary to carry out the project's objectives;
- Development and production of outreach materials when no other appropriate materials exist;
- Lease or rental costs;
- Maintenance expenses;
- Other indirect costs; and
- Charges for travel for the purpose of fulfilling the approved outreach plan based on official State, local or university travel regulations.

What administrative expenses are unallowable?

Unallowable costs per 2 CFR 225 (OMB Circular A-87) and 2 CFR 220 (OMB Circular A-21) for State and local governments include:

- Bad debts, uncollected accounts or claims, and related costs.
- Contributions to an emergency reserve or similar provision for unforeseen events (contingencies.) (Note: These are not insurance payments which are allowable.)
- Contributions and donations (usually these are political in nature).
- Costs that are primarily for entertainment, amusement or social activities. (Note: Meals are cited in the OMB regulations as unallowable but within the context of training, meals might be allowable.)
- Fines, violations or penalties for failure to comply with Federal, State, or Local laws.
- Costs of general government, such as the Governor's office. Costs which may be directly charged to a Federal grant may be allowable, such as if a person assigned to the governor's office devotes 100 percent of his/her time to the FSP. Each situation, however, must be judged on its own merit.
- Payments to third parties and other losses not covered by insurance (indemnification).
- Losses not covered by insurance (Note: See Indemnification above. These costs are similar, but not the same).
- Legislative expenses.
- Shortfalls in one grant cannot be charged to another Federal grant (Recovery of Costs under Federal Funding Agreements). (Note: This is not the same as charging two Federal grants for a share of the costs of the activity if both agencies benefit from the activity funded. However, an allocation basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic beverages.

Similar lists are found in 2 CFR 215 (OMB Circular A-110) and 2 CFR 230 (OMB Circular A-122), the OMB regulations applicable to universities and non-profit organizations).

Under 2 CFR 220 (OMB Circular A-21), there are some unallowable cost categories in addition to those listed above:

- Advertising and public relations unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant. (Note: Paid media buys for educational purposes such as to promote the nutrition benefits of the FSP via an outreach program are not precluded by this provision and are allowable.)
- Alumni activities.
- Commencement and convocations.
- Legal fees which result from a failure to follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive lobbying.
- Goods and services for private use.
- Housing and personal living expenses.
- Interest, fund raising, and investment management. For interest, there are exceptions. If interest cost is shown it will be examined in light of the exceptions.
- Any and all political party expenses.
- All costs incurred prior to the approval of the outreach plan (pre-agreement costs.)
- Scholarships and student aid.
- Student activity costs.
- Travel is allowable but with restrictions as to amount and level of transportation cost (for example, no first class tickets).

How are reasonable staff wages and benefits determined?

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

Staff time claimed for outreach cannot be used as a reimbursement item for any other Federal grant.

Are subscriptions and professional activity costs allowable?

Cost of memberships for the institution (staff who work directly on the outreach project) in business, technical, and professional organizations are allowable. The cost must be prorated according to the percentage of time spent by the employees working on outreach and consistent with the effort to promote the provision of quality food stamp outreach (*2 CFR 220 (OMB Circular A-21).*)

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

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

Are scholarships and tuition remission allowable?

With regard to reimbursement, there is a distinction between scholarships, fellowships, and other similar financial transactions, and tuition remission and similar work study payments (*2 CFR 220 (OMB Circular A-21).*)

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

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

Tuition remission may be allowable if:

- A bona fide employer-employee relationship exists between the student and the institution for the work performed.
- The tuition or other payments are reasonable compensation for work performed and are conditioned explicitly upon the performance of necessary work.
- The institution's practice is to similarly compensate students in non-Federally funded activities and Federally funded activities.
- The student who receives tuition remission for food stamp outreach accounts for their time. The financial review of this charge takes into account the type of work performed and the number of hours worked.

- Tuition remission is charged according to the percentage of time the student worked on food stamp outreach.

Is purchase of outreach reinforcements allowable?

Outreach reinforcements are items (such as magnets, pencils, pens, or notepads) of an educational or informational nature containing an outreach message (such as a phone number) which are given to low income people potentially eligible for food stamp benefits. To be allowable, such items must:

- Have a direct relationship to program objectives;
- Be reasonable and necessary;
- Be given to potentially eligible clients;
- Contain an outreach message that enables the person to follow up and take action; and
- Be of nominal value (\$4.00 or less per item).

The following items are not allowable:

- Celebratory Items;
- Items for staff;
- Items for ineligible people;
- Items that cost more than \$4;
- Items intended as rewards for prescreening or completing an application;
- Items with no outreach messages; and
- Unreasonable or unnecessary items.

How should a value be set on publicly owned space?

The costs of publicly owned space may only be recovered with a depreciation schedule or use allowance, plus applicable charges for utilities, maintenance, and general upkeep. Cost for space owned by a public entity can not be reimbursed based on private market rental rates, regardless of whether it is direct billed or donated. (*OMB regulations at 2 CFR 225 (OMB Circular A-87), 2 CFR 220 (OMB Circular A-21), and 2 CFR PART 215 (OMB Circular A-110) and Departmental regulations at 7 CFR 3016. and FNS Policy Memorandum-March 9, 1998*)

Whether depreciation or a use allowance is used, the food stamp outreach share of the costs should be calculated using the percentage of square footage used for outreach. In most cases, depreciation will be used. Use allowance is applied when the building is fully depreciated. State food stamp agencies may charge no more than two percent of the cost of the building per year.

FNS has developed a standard cost of \$5.31 for 1000 square feet in use for one hour. The breaks out into a \$2.04 hourly charge for 1000 square feet of space and a \$3.27 hourly charge for the same 1000 square feet for maintenance and utility cost. State agencies may use this standard rate in lieu of depreciation or use allowance calculation at their option. A State agency may use actual data if available and preferred. Or a State agency may prefer to use part of the standard cost such as the space or maintenance and utility costs separately. The State agency must note in the outreach plan (budget narrative) how it derived its cost calculations.

How should a value be set for volunteer services?

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

- Compute the volunteer's wages on a reasonable hourly basis in accordance with the duties being performed for outreach or based on the Federal minimum hourly wage established by the United States Department of Labor;
- Record time for the volunteer (see Section D); and
- Do not use the value of the volunteer's time as a match for any other Federal grant.

How should a value be set for donated goods?

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

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

What are the rules for property procurement and management?

Prior Federal approval must be received before the State food stamp agency may procure or request reimbursement for equipment valued at more than \$5,000. Review and approval of equipment purchases are normally conducted during review of the proposed budget when the outreach plan is submitted to the appropriate regional office. Budget reviews ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project (*7 CFR 3016*.)

Inventory records must be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

5. Indirect Cost Policy

What are indirect costs?

Indirect costs are costs incurred by State agency or State agency contractor in support of allowable activities that are directly charged to sponsoring Federal or State agencies. Indirect costs are also called overhead costs.

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

Indirect cost rates are documented through an indirect cost plan approved by a cognizant agency.

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

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

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

What if my agency does not have an approved indirect cost rate or cost allocation plan?

FNS has determined that under OMB Circular A-87, the prime grantee (in this case, the State agency) is responsible for review of indirect costs of their sub-grantees (in this case, contractors).

If an agency does not have an approved indirect cost rate or cost allocation plan from a cognizant entity, the agency may seek approval from the State food stamp agency to use a rate developed by or for it. The State food stamp agency must indicate its acceptance of the local organization's indirect cost rate in the outreach plan. If the State agency does not accept the indirect cost rate, the FNS Regional Office also will not accept the rate. In addition, the FNS Regional Office may accept or reject the rate based on the rate computation documents provided.

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

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

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

Indirect costs at colleges and universities are limited to 26 percent of Modified Total Direct Costs (2 CFR 220 (OMB Circular A-21).)

FNS will accept indirect cost rates for colleges and universities that are approved by the appropriate cognizant entity. Unless justification is provided, only the off-campus rates may be used. If additional categories such as "other sponsored activities" are covered, FNS will not accept "instructional rates" without justification. In most outreach plans, only one rate may be used for each program charged. As a result, any justification for using either the "on-campus" or "off-campus rate" must be based on where the majority of the allowable activities take place.

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

6. Record Retention and Disclosure Policy

What are the applicable record retention policies?

All records must be retained for three years from fiscal closure. This requirement applies to fiscal records, reports and client information. Supporting documentation may be kept at the sub-grantee (contractor) level, but must be available for review for three years from the date of quarterly claim submittal. Any costs that cannot be substantiated by source documents will be disallowed as charges to the FSP. (7 CFR Section 272.1(f))

What is the disclosure policy?

Case file information on FSP recipients, including names of recipients, social security numbers, and other sensitive information, is considered confidential and may not be released. Disclosure of information obtained from recipients may be made only to persons directly connected with the administration of FSP or to others provided that the program recipient signs a release form documenting their agreement to the specific release. Such an agreement shall not be a condition of receipt of benefits. (7 CFR Section 272.1(c) and (Section 11(e) (8) of the Food Stamp of 1977 as amended.)

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

7. Materials Development Policy

What are the requirements for development of outreach materials?

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

Materials developed or reprinted with FSP funds must include the **non-discrimination statement** (7 CFR Section 272.5(a) (4)). When it is not possible to include the full statement, the following abbreviated statement may be used, at a minimum, in print no smaller than the text: *“This institution is an equal opportunity provider and employer.”*

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

State agencies are encouraged to submit their materials to the FNS for sharing as promising practices, samples, or lessons learned (see Section D.)

What is the non-discrimination statement?

In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800)795-3272 (voice) or (202)720-6382 (TTY). USDA is an equal opportunity provider and employer.

What is the funding credit statement?

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

When should materials be provided in languages other than English?

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

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

8. Reporting Policy

How should employees record their time?

Time and effort reporting is required for all paid staff (full and part time) and volunteers supported by the outreach plan. Time records are used to calculate the charges, including salaries and benefits, for time spent on allowable activities.

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

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

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

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

- Time records are required for all part time outreach staff and volunteers. (See Section D for a sample format.)
- Time must be reported in hours, and not percentage of time to the project.
- State agencies may develop their own forms. The form must include space to enter hours spent on outreach, date, and employee and supervisor signatures.
- If the entity has a Federally approved Random Moments Time Study, it may be used in lieu of time records.
- If a university or college has an approved Plan Confirmation from the Department of Health and Human Services, it may be used in lieu of time records.

- If a university has a procedure for hourly documentation already in place, it may meet the reporting requirement, subject to FNS review and approval.
- Time and effort forms can be maintained at the work site and must be available for review/audit for a period of three years.
- State agencies may submit alternative methods of calculating time, including a justification, for review by the FNS Regional Office. The alternative method of calculating time must provide a reasonable assurance of accuracy in order to be considered for approval.

When calculating costs, the total cost, including annual and sick leave, must be computed and charged. The official accounting system used for grants and funding arrangements must be used in calculating this cost so that official accounting records reflect all of the costs of outreach.

Section C: Outreach Plan Template

1. Cover Page/Contact Information/Signatures

Multiple year plans: Complete Section 1 each year.

FOOD STAMP PROGRAM Annual Plan for Outreach

State: Enter the name of your State

State Agency: Enter the name of your State food stamp agency

Fiscal Year: Enter the Federal fiscal year.

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

Name	Title	Phone	Email
<i>Insert more rows as needed.</i>			

Certified By:

<Signature of Authorized Person>

State Food Stamp Agency Director (or Commissioner)

Date

Certified By:

<Signature of Authorized Person>

State Food Stamp Agency Fiscal Reviewer

Date

2. Statement of Need

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

3. Outreach Plan Summaries

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

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

Project Number	Title	Geographic Area	Target Audience	Contracted (list contractor) or In-House?
1	Outreach Worker Train-the-Trainer	Newtown	Food Pantry Volunteers; Health Center Case Managers; Parish Nurses	In-house
2				
<i>Insert more rows as needed.</i>				

4. Outreach Project Details

Project Table: Complete this section for each project listed in the Summary of Projects Table in Section 3 above. (Suggested length: Not more than 2 pages for each project)

Project Number	<i>List the project number as noted in the table in Section 3.</i>			
Goal	<i>List the goal of the project. The goal should be measurable (a numeric goal, if possible). Likely, the goal will focus on increasing food stamp participation. Indicate if the number of people is contacts, applicants, approved applicants, etc.</i>			
Timeline	Start	<i>Month and year, quarter, or annual/ongoing.</i>	End	<i>Month and year, quarter, or annual/ongoing.</i>
Description of Activity	<i>Provide a description of the activity and how it will be implemented.</i>			
Contractor	<i>If a contractor will be hired, list the name of the contractor. If there is no contractor, indicate so.</i>			
Role of the Contractor	<i>Describe the role of the contractor. Add rows for additional contractors, if necessary.</i>			
Partner 1	<i>List the name of partner 1. Partners may be community or faith-based organizations, local food stamp offices, food banks or pantries, retailers, or other community organizations. Obtaining a letter of commitment from your partners is good project management. It is suggested that you obtain such a letter from each partner and maintain the letter in your files. Add rows for additional partners, if necessary.</i>			
Role of Partner 1	<i>Describe the role of partner 1. Add rows for additional partners, if necessary.</i>			
Evaluation	<i>Explain how the project will be evaluated. Include your data collection and analysis plan. Note if your evaluation will be able to assess how many people reached by the outreach activities were certified or denied for food stamp benefits.</i>			

5. Outreach Project Staffing Details

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

Multiple year plans: Complete Section 5 each year.

Project Number	List the project number as noted in the table in Section 3.						
Staff Person Title	Name of Staff Person	(a) FTE Outreach	(b) Salary	(c = aXb) Outreach Salary	(d) Benefits Rate	(e = cXd) Outreach Benefits	(f=c+e) Total
Outreach Worker	Smith	.5	\$25,000	\$12,500	20 %	\$2500	\$15000
<i>Insert more rows as needed.</i>							

6. Outreach Project Budget Details and Narrative

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

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

Justification Example: Local travel is calculated at 6 round trips from Capital City to Newtown to train outreach workers. Each trip is 120 miles round trip. ($6 \times 120 = 720$ total miles) The mileage rate is \$.485. The total cost for local travel is $720 \times \$.485 = \349.20 .

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

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

7. Budget Summary

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

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

LINE ITEM BUDGET SUMMARY						
	Non-Federal Funds					
Expenses	(a) Public Cash	(b) Public In- kind	(c) Private Cash	(d=a+b+c) Total	(e) Federal Funds	(f=d+e) Total Funds
(g) Personnel (Salary and Benefits)						
Other Direct Costs						
(h) Copying/Printing/Materials						
(i) Internet/Telephone						
(j) Equipment and Other Capital Expenditures						
(k) Supplies and Non Capital Expenditures						
(l) Building/Space						
(m) Other						
(n=h+i+j+k+l+m) Subtotal Other Direct Costs						
Travel						
(n) Long Distance						
(o) Local						
(p=n+o) Subtotal Travel						
(q) Contractual						
(r=g+n+p+q) Total Personnel, Direct Costs, Travel, and Contractual						
(s = indirect cost rate X r) Indirect Costs						
(t=r+s) TOTAL						

8. Assurances

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

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

9. Attachments

- FNS-366A (Budget Projection)
- Indirect Cost Rate Agreement
- *Add others as needed*

Section D: Formats for Reports and Waiver Requests

1. Final Report Format

Final Report: *This is a suggested format for the final report. Suggested length is not more than three pages. The due date is December 31. Use the promising practices format (Section E) to report lessons learned from your project that you would like to share with others.*

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

Major Accomplishments: *Include a brief description of the major accomplishments and achievements of the outreach plan.*

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

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

<Signature >

State Food Stamp Program Director

Date

3. Time and Effort Format

This is a suggested format to record employee time spent on food stamp outreach. This is a tool for your use. Do not submit time records with your outreach plan. For time and effort reporting policy, see page 20.

Name:
Title/Position:
Location:

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
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31	

Month:	
Day	Hours Worked
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29	
30	
31	

Month:	
Day	Hours Worked
1	
2	
3	
4	
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30	
31	

Month's Total:

Month's Total:

Month's Total:

Employee signature & date:
 Supervisor signature & date

Quarter Total:

4. Waiver Request Format

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Section E: Resources

1. Glossary

Applicant: Persons/households who have applied for food stamp benefits.

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

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

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

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

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

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

FSP Eligibles: Persons that meet criteria for participation in the FSP as described in Federal legislation and regulations.

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

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

Lobbying: Any activity or material to influence Federal, State, or local officials to pass, or sign legislation or to influence the outcomes of an election, referendum, or initiative.

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

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

Non-Federal Public Agency: A State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such as organizations that are chartered by State or local governments for public purpose.

Nutrition Education: A set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition-related behaviors conducive to health and well being for those on a limited budget.

Outreach: Educational and informational efforts promoting the nutrition and other benefits of participating in the FSP which are directed to nonparticipating but potentially eligible persons. Also known as program informational activities.

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

Plan Confirmation: A time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of Plan Confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of Plan Confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS.

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

Program Access Activities: Activities that help current participants maintain and continue their participation, and include pre-certification efforts, but fall short of activities that are essentially certification. For example, projects intended to increase retention rates of participants; support a client friendly environment; simplify applications or the application process; or educate persons who are losing TANF benefits about their possible continued eligibility for the FSP.

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

Public Service Announcement: An advertisement in a newspaper, on radio or television at no cost to the sponsor as a public service to the community by the media organization.

Random Moment Time Studies: Time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities and funding sources.

Recruitment: An activity intended to persuade an individual who has made an informed choice not to apply for food stamp benefits to change his or her decision. Recruitment is unallowable.

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

State Agency: The agency of State government, including the local offices thereof, which is responsible for the administration of the Federal 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.

Subgrantee: The organization or person to which a State agency, as grantee, takes an agreement to conduct outreach activities. Federal funds reimburse the State agency for half of its allowable administrative costs, including outreach. The grantee in turn generally will reimburse sub grantees for half of their allowable costs. The sub grantee is accountable to the grantee for the use of funds provided, and the grantee is accountable to the Food and Nutrition Service for the use of all Federal funds provided.

2. Free Food Stamp Outreach Materials From FNS

FNS makes numerous food stamp outreach materials available for free via its website, including:

- Outreach tool kits for community partners, State and local food stamp agencies, and retailers;
- Posters, flyers, and brochures in Spanish and English for order for free;
- Posters, flyers, brochures, and handouts in Spanish and English in PDF for download;
- Brochures and handouts in 35 different languages in PDF for download;
- Suggestions for outreach activities;
- Promising practices;
- Photo gallery with images to download and use in State or local outreach materials; and
- Radio and television public service announcements.

Visit the FNS Food Stamp Outreach web site for these resources and much more:

<http://www.fns.usda.gov/fsp/outreach/default.htm>

3. FSP Web Resources

Topic	Description	Address
Main FSP Web Page	General information about the FSP.	www.fns.usda.gov/fsp/
USDA Center for Faith-Based and Community Initiatives	Information about USDA's initiatives for faith-based and community organizations.	www.usda.gov/fbci/index.html
Summaries of Grant Projects	Brief descriptions of outreach grant projects that received awards in fiscal years 2004, 2005, 2006, and 2007.	http://www.fns.usda.gov/fsp/outreach/grants.htm
Main Food Stamp Outreach Web Page	Starting point for information about food stamp outreach.	www.fns.usda.gov/fsp/outreach/default.htm
FNS Pre-screening Tool (Step 1)	Simple, low literacy online pre-screening tool enables users to input information privately and find out if they might be eligible for food stamp benefits and how much they might receive.	www.foodstamps-step1.usda.gov
Food Stamp Program Participation Data	Features data and studies about participation in the FSP and the characteristics of households receiving food stamp benefits. Also includes evaluation reports for past FNS outreach grant programs.	www.fns.usda.gov/oane/MENU/Published/FSP/Participation.htm
Economic Impact of Food Stamp Benefits	Links to studies about the economic benefits of food stamps. Includes research conducted for USDA's Economic Research Service (ERS), which is USDA's main source of economic information and research.	www.fns.usda.gov/fsp/researchers/ers_reports.htm www.ers.usda.gov/publications/fanrr26/fanrr26-6/ www.ers.usda.gov/Briefing/GeneralEconomy/linkages.htm
United States Census Bureau	Data on income and poverty levels, including data by county and State.	www.census.gov