PROPOSAL BACKGROUNDER

MFF SNAP-Ed Community Impact Grant: Request for Proposals (RFP)
Fiscal Year 2021 (October 1, 2020 – September 30, 2021)

This document references the current FY 2020 USDA SNAP-Ed Guidance.
Updated regulations and guidance will be issued by USDA and will replace previous versions. All SNAP-Ed projects will need to adjust programming for compliance when applicable.

Michigan Fitness Foundation’s (MFF) SNAP-Ed Community Impact Grant: Request for Proposals (RFP) includes the following components:

1. **Letter of Intent** – This is required and must be completed and submitted to MFF according to the Proposal Instructions by 4:30 pm EST March 19, 2020. It assists MFF with planning for the proposal review process.
2. **Proposal Backgrounder** – This document includes background information about SNAP-Ed at MFF that will be useful when completing the proposal.
3. **Proposal Form** – This form needs to be completed and submitted to MFF according to the Proposal Instructions.
4. **Needs Assessment and Programming Table** – This table accompanies the Proposal Form and must be completed and submitted to MFF according to the Proposal Instructions.
5. **Proposal Instructions** – This document includes directions for completing and submitting the Proposal Form and Needs Assessment and Programming Table, as well as other proposal pieces.
6. **Budget Worksheet** – This document must be completed and submitted to MFF according to the Budget Instructions.
7. **Budget Instructions** – This document includes directions for completing and submitting the Budget Worksheet.
8. **Letter of Qualification** – This must be completed, signed, and submitted to MFF according to the Proposal Instructions.
9. **SNAP-Ed Compliance Assurances** – This document must be signed and submitted to MFF according to the Proposal Instructions.
10. **Evaluation Assurances** – This document must be completed, signed, and submitted according to the Proposal Instructions.
11. **Current and Pending** – This must be completed according to the instructions in the document and submitted to MFF according to the Proposal Instructions.

This Request for Proposals is due by April 20, 2020 at 4:30 pm EST.

This institution is an equal opportunity provider.
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Sections that include new content or have significant revisions based on the FY 2020 Guidance are highlighted in yellow to assist users in identifying this information.
## FY 2021 RFP TIMELINE

<table>
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<tr>
<th>Event</th>
<th>Date/Deadline</th>
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<tr>
<td>Technical Assistance Sessions and FAQs.</td>
<td>Posted on SNAP-Ed at MFF website</td>
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<tr>
<td>Letter of Intent due to MFF by 4:30 p.m. EST (Required).</td>
<td>March 19, 2020</td>
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<tr>
<td>Electronic submission of the entire proposal package must be uploaded to MFF by 4:30 p.m. EST, according to Proposal Instructions. Five (5) Hardcopies of the entire proposal package must be mailed and postmarked by 04/20/20, according to Proposal Instructions.</td>
<td>April 20, 2020</td>
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<tr>
<td>Michigan FY 2021 SNAP-Ed Plan of Work prepared for Michigan Department of Health and Human Services (MDHHS) and USDA.</td>
<td>July 2020</td>
</tr>
<tr>
<td>SNAP-Ed University, mandatory training for all organizations whose proposals for the MFF SNAP-Ed Community Impact Grant: Request for Proposals are included in the Michigan FY 2021 SNAP-Ed Plan of Work (Held in Lansing).</td>
<td>August 2020</td>
</tr>
<tr>
<td>Expected USDA notification regarding FY 2021 SNAP-Ed Plan of Work submission.</td>
<td>Late September 2020</td>
</tr>
<tr>
<td>MFF SNAP-Ed FY 2021 programming begins, conditional on USDA approval caveats (if any).</td>
<td>October 1, 2020</td>
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<tr>
<td>Mid-Year Report (October – March) due to MFF</td>
<td>April 2021</td>
</tr>
<tr>
<td>Final Report due to MFF</td>
<td>November 2021</td>
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**Note:** Dates subject to change based on deadlines established by MDHHS and MFF.
SNAP and SNAP-Ed in MICHIGAN
The United States Department of Agriculture’s (USDA) Supplemental Nutrition Assistance Program (SNAP) provides nutrition assistance benefits to eligible low-income households so they can purchase food from authorized food retailers. The mission of the USDA Food and Nutrition Service (FNS) is to increase food security and reduce hunger by providing children and low-income people access to food, a healthful diet, and nutrition education.

In Michigan, all SNAP programming is administered by the Michigan Department of Health and Human Services (MDHHS).

As part of the SNAP program outlined above, USDA and MDHHS support nutrition education and physical activity promotion—Supplemental Nutrition Assistance Program Education (SNAP-Ed)—for those eligible to receive SNAP benefits. MDHHS has established two SNAP-Ed Implementing Agencies—the Michigan Fitness Foundation (MFF) and Michigan State University Extension (MSU Extension).

The goal of SNAP-Ed is to improve the likelihood that persons eligible for SNAP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the most current Dietary Guidelines for Americans and the USDA food guidance.

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

The Federal focus of SNAP-Ed is:
- Implementing strategies or interventions, among other health promotion efforts, to help the SNAP-Ed target audience establish healthy eating habits and a physically active lifestyle; and
- Primary prevention of diseases to help the SNAP-Ed target audience that has risk factors for nutrition-related chronic disease, such as obesity, prevent or postpone the onset of disease by establishing healthier eating habits and being more physically active.

Throughout the U.S., SNAP-Ed programs utilize behaviorally-focused, evidence-based nutrition education and obesity prevention interventions, projects, or social marketing campaigns that are consistent with the FNS mission and the goal and focus of SNAP-Ed. Nationally, SNAP-Ed maximizes its impact by concentrating on a small set of key population outcomes supported by evidence-based direct education (DE), multi-level interventions, social marketing, policy, systems and environmental change (PSE) efforts, and partnerships.

USDA FNS Guiding Principles for SNAP-Ed
1. SNAP-Ed is intended to serve SNAP participants, low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs, and individuals residing in communities with a significant low-income population. For this definition, significant is considered 50 percent or greater. The term “means-tested Federal assistance programs” is defined as Federal programs that require the income and/or assets of an individual or family to be at or below 185 percent of the Federal Poverty Guidelines to qualify for benefits. (See SNAP-Ed Target Audiences for additional information about target audience qualifications.)
2. SNAP-Ed must include nutrition education and obesity prevention services consisting of a combination of educational approaches. Nutrition education and obesity prevention services are delivered through partners in multiple venues and involve activities at the individual, interpersonal, community, and societal levels. Acceptable policy level interventions are activities that encourage healthier choices based on the most current Dietary Guidelines for Americans. Intervention strategies may focus on increasing or limiting consumption of certain foods, beverages, or nutrients consistent with the Dietary Guidelines for Americans.

3. While SNAP-Ed has the greatest potential impact on behaviors related to nutrition and physical activity of the overall SNAP low-income households, when it targets low-income households with SNAP-Ed eligible women and children, SNAP-Ed is intended to serve the breadth of the SNAP eligible population.

4. SNAP-Ed must use evidence-based, behaviorally-focused interventions and maximize its national impact by concentrating on a small set of key population outcomes supported by evidence-based multi-level interventions. Evidence-based interventions based on the best available information must be used.

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

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

The Focus of SNAP-Ed at the Michigan Fitness Foundation
The Michigan Fitness Foundation (MFF) requests that SNAP-Ed programs focus on two of the USDA’s identified SNAP-Ed behavioral outcomes:
1. Increased fruit and vegetable consumption; and
2. Increased physical activity (and reduced sedentary behaviors).

The primary emphasis of SNAP-Ed programming in Michigan should be on assisting the SNAP-Ed target population to establish healthy eating habits and physically active lifestyles to promote health and prevent disease, including obesity. SNAP-Ed programs, however, may have secondary or intermediate behavioral outcomes consistent with the SNAP-Ed objectives described above:
3. Improved behaviors associated with caloric balance (at all stages of the life cycle);
4. Increased whole grain consumption (make half your grains whole);
5. Switch to low-fat and fat-free milk and milk products; and
6. Other intermediary behaviors toward the above outcomes (1-5) (must be evidence-based as documented in the proposal).

Programs should consider the unique needs of people eligible for SNAP, specifically the need to make healthy choices on a tight food budget and to increase physical activity to achieve or maintain caloric balance. The Dietary Guidelines for Americans are the foundation of nutrition education and obesity prevention efforts in all FNS nutrition assistance programs. Therefore,
messages delivered through SNAP-Ed must be consistent with the most current Dietary Guidelines for Americans.

Please refer to the USDA Center for Nutrition Policy and Promotion website (https://www.fns.usda.gov/cnpp) for complete information on the most current Dietary Guidelines for Americans.

SNAP-Ed programs are required to coordinate their SNAP-Ed efforts with other public- and privately-funded health promotion or nutrition improvement strategies, especially those implemented by other FNS nutrition assistance programs. The Map To Healthy Living website (map2healthyliving.org) was developed to support cross program collaboration in Michigan.

SNAP-Ed Program Approaches and Behavioral Outcomes

Intervention strategies, behavioral outcomes, and evaluation strategies should be clearly identified in all proposals and detail how DE and PSE programming will work in tandem to achieve outcomes. Changing health behaviors at any level is complicated, as is selecting the appropriate measurable indicators for evaluating the desired behavioral outcomes. Identification and evaluation of intermediate changes may be appropriate. If this is the case, SNAP-Ed programs must provide rationale that describes the logic for including intermediary steps in achieving the desired behavioral outcomes.

Updated regulations and guidance for SNAP-Ed allow and encourage additional layers of evidence-based approaches to behavior change. These approaches and their rationale are summarized in the most current Dietary Guidelines for Americans. The Social-Ecological Model (SEM) on which these approaches are based offers an opportunity to integrate coordinated, multi-level and multi-component approaches, ensuring a comprehensive approach to SNAP-Ed programming that is consistent with current public health practices for health promotion and disease prevention. SNAP-Ed approaches must include Approach One and Approach Two and/or Approach Three, as indicated below. **Approach One activities must be combined with interventions and strategies from Approaches Two and/or Three.**

1. Approach One – Individual or group-based direct nutrition education, health promotion, and intervention strategies.

    AND

2. Approach Two – Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels.

    OR

3. Approach Three – Community and public health approaches to improve nutrition and obesity prevention.

Approaches Two and Three relate to a focus on PSE change efforts* that create a supportive environment in which people can engage in healthy behaviors. It is not enough to provide direct education to help people understand why and how to choose healthy foods and/or be physically active; SNAP-Ed programs need to address PSE factors in venues where people are participating in learning and make changes that increase opportunities for them to make healthy choices.

*Note that SNAP-Ed providers play a supportive but not leading role in PSE change efforts and partnerships.
Programs must include multi-level approaches that are related to one another. All approaches must potentially and collectively have an impact on the nutrition and physical activity behaviors of the same target population that the SNAP-Ed program is proposing to work with.

Please refer to the *Dietary Guidelines for Americans* for detailed information on the Social-Ecological Framework for Nutrition and Physical Activity Decisions depicted below. MFF encourages comprehensive interventions that address multiple levels of this framework to reach the SNAP-Ed target population in ways that are relevant and motivational to them, while addressing constraining environmental and/or social factors in addition to providing direct nutrition education and physical activity promotion. Working with partners to achieve this furthers SNAP-Ed’s collaborative efforts, reduces the likelihood of duplication of effort, and aligns SNAP-Ed’s strategies with current public health practices for health promotion and disease prevention.

![A Social-Ecological Model for Food and Physical Activity Decisions](image)

**Using Evidence-Based Interventions**

Using evidence-based interventions and strategies means that you are more likely to achieve intended outcomes with your target audience(s), resulting in desired, sustainable healthy behaviors. SNAP-Ed projects and programs must be either evidence-based or practice-tested, implemented with fidelity (i.e., delivering an intervention as intended including using all intervention components and following scope and sequence), and have:

- Evaluation outcomes that clearly demonstrate effectiveness of the intervention for your specific audience(s) (If an evidence-based or practice-tested intervention or strategy is modified, further justification and data are necessary to support that the intervention, as modified, can be expected to have the desired impact); and

- Effective education strategies including behaviorally-focused nutrition education and physical activity promotion, use of motivators and reinforcements, multiple channels of communication of messages, opportunities for active personal engagement (behavior practice), and justification of duration and intensity of messages.

A good place to find potential interventions is the [SNAP-Ed Toolkit](#) (Toolkit). The Toolkit, however, is not an exhaustive list, and not all of the interventions listed are fully SNAP-Ed allowable or are appropriate for Michigan. In addition, FNS created a [checklist for evidence-based programs](#) to classify interventions according to levels of evidence.
Policy, Systems, and Environmental Change (PSE) Interventions

The 2015-2020 Dietary Guidelines for Americans recognizes that everyone has a role in helping support healthy eating patterns in multiple settings nationwide, from home to school to work to communities, in which people live, learn, work, shop, eat, and play. PSE efforts can be implemented across a continuum and may be employed on a limited scale as part of the multi-level interventions of Approach Two or in a more comprehensive way through the community and public health approaches of Approach Three.

Taken together, education, marketing, and PSE changes are more effective than one strategy alone for preventing overweight and obesity. While PSE changes have the potential to reach more people than can be served through individual or group contacts, PSE efforts will benefit by combining them with reinforcing educational or marketing strategies used in SNAP-Ed or that are conducted by partners such as other FNS programs or Centers for Disease Control and Prevention (CDC).

One way to envision the role of SNAP-Ed is to provide consultation and technical assistance to organizations in creating appropriate PSE changes that benefit low-income households and communities. The organization that receives the consultation and technical assistance is ultimately responsible for adopting, maintaining, and enforcing the PSE change.

The definitions and examples below help clarify SNAP-Ed’s role in implementing PSE.

**Policy:** A written statement of an organizational position, decision, or course of action. Ideally policies describe actions, resources, implementation, evaluation, and enforcement. Policies are made in the public, non-profit, and business sectors. Policies will help to guide behavioral changes for audiences served through SNAP-Ed programming.

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

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

*Example:* A local food policy council creates a farm-to-fork system that links farmers and local distributors with new retail or wholesale customers in low-income settings. The local SNAP-Ed provider could be an instrumental member of this food policy council, providing insight into the needs of the low-income target audience.

**Environmental:** This includes the built or physical environments which are visual/observable, but may include economic, social, normative or message environments. Modifications in settings where food is sold, served, or distributed may promote healthy food choices. Signage that promotes the use of stairwells or walking trails may increase awareness and use of these amenities. Social changes may include shaping attitudes among administrators, teachers, or service providers about time allotted for school meals or physical activity breaks. Economic changes may include financial disincentives or incentives to encourage a desired behavior, such
as purchasing more fruits and vegetables. Note that SNAP-Ed funds may not be used to provide
the cash value of financial incentives, but SNAP-Ed funds can be used to engage farmers
markets and retail outlets to collaborate with other groups and partner with them.

Example: A food retailer serving SNAP participants or other low-income persons increases the
variety of fruits and vegetables it sells and displays them in a manner to encourage consumer
selection of healthier food options based on the most current Dietary Guidelines for Americans.
A SNAP-Ed provider can provide consultation and technical assistance to the retailer on
assessing its environment, expanding its fruit and vegetable offerings, and behavioral
techniques to position produce displays to reach the target audience.

Examples of partnerships and initiatives to implement PSE changes:
(Examples provided below are not an all-inclusive list of possibilities.)

- Collaborating with community groups and other organizations such as Food or Nutrition
Policy Councils to improve food, nutrition, and physical activity environments to facilitate
healthier eating and physical activity among the low-income population;

- Delivering technical assistance to a local corner or country store to create a designated
healthy checkout lane. Other activities might include assessing the store environment,
providing training to retailers on healthy foods to stock, and identifying strategies that
encourage people to purchase and use healthy foods, or partnering with other groups on
a healthy food financing initiative; or

- Conducting health promotion efforts, such as promoting use of an existing walking trail
or selecting healthy foods from vending machines.

SNAP-Ed Evaluation Framework
The SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention
Indicators (Framework) includes a focused menu of outcome indicators that align with the
SNAP-Ed guiding principles and lend support to documenting changes resulting from a multi-
level approach to nutrition education and obesity prevention efforts. Practitioners use the
Framework to identify and map out indicators of success when implementing multi-component
programming, DE, and PSE, where low-income people eat, live, learn, work, play, and shop, as
well as across states, cities, towns, tribes, and communities.

The Framework can look overwhelming; to help navigate it, think about the three approaches to
SNAP-Ed programming outlined above and how they align with outcome indicators at each level
of the Framework.

- Individual level aligns with Approach One (direct education);
- Environmental Settings level aligns with Approach Two (PSE changes at an organization
or specific setting); and
- Sectors of Influence level aligns with Approach Three (community or public health
approaches influenced by multiple sectors working together).

In general, short-term indicators relate to getting ready to make a change, medium-term
indicators relate to adopting a change, and long-term indicators relate to maintaining a change.
Using the Framework will enable SNAP-Ed programs to monitor and evaluate the
implementation and effectiveness of the strategies and interventions while also communicating
outcomes to SNAP-Ed stakeholders and funders.
The *Framework* must be used to identify indicators of success when implementing multi-component programs. MFF-funded SNAP-Ed programs will focus on *Framework* indicators and outcome measures at the Individual level and the Environmental Settings level. In addition, funded programs are encouraged to use a collaborative, multi-sector partnership and planning approach to achieve program goals (Indicator ST8 in the Sectors of Influence level).

Programs should focus reporting on outcome measures aligned with the SNAP-Ed priority indicators identified by the USDA:

- MT1: Healthy Eating Behaviors;
- MT2: Food Resource Management;
- MT3: Physical Activity and Reduced Sedentary Behaviors;
- ST7: Organizational Partnerships;
- MT5: Nutrition Supports Adopted; and
- ST8: Multi-Sector Partnerships and Planning.

Michigan has included other priority indicators and related outcome measures in its focus:

- ST5: Needs and Readiness;
- ST6: Champions;
- MT6: Physical Activity and Reduced Sedentary Behavior Supports;
- LT5: Nutrition Supports Implementation; and
- LT6: Physical Activity Supports Implementation.
Multi-sector partnerships and planning is a collaborative approach that includes actively working with representatives from multiple sectors advance and achieve community-wide changes in the nutrition and physical activity environments. Changing health behaviors at any level is complicated, as is selecting the appropriate metrics for evaluating the outcomes. Identification and evaluation of intermediate changes can be appropriate.

Organizations funded through the MFF SNAP-Ed Community Impact Grant: Request for Proposals (RFP) must measure at least one Individual level indicator plus at least one short-term and at least one medium-term Environmental Setting level indicator as part of their programming, as well as demonstrate how a multi-sector collaborative approach will be used to implement chosen interventions.

Organizations who have previously received SNAP-Ed funding through (any) MFF RFP:

- If you have implemented SNAP-Ed programming for at least two (2) full program years, ST8: Multi-Sector Partnerships and Planning is required.
- If you have implemented SNAP-Ed programming in any domain* for at least three (3) full program years, at least one LT indicator per domain, such as LT5: Nutrition Supports Implementation or LT6: Physical Activity Supports Implementation, must be included.

*See below in “Categories of SNAP-Ed Settings” for the list of domains.

Categories of SNAP-Ed Settings

To maintain consistency across states in reporting changes in policies, systems and environments, the Framework categorizes SNAP-Ed settings into six domains—EAT, LIVE, LEARN, WORK, PLAY, SHOP. This helps to aggregate activities across settings in a meaningful way. This also helps with tracking and reporting outcomes across multiple sites, or different physical locations where SNAP-Ed services are provided. All settings should be categorized into a domain as follows:

### Domains

**Eat**  
Fast food chains, restaurants, mobile vending/food trucks, congregate meal sites and other senior nutrition centers (or, other places where people primarily go to “eat”)

**Live**  
Faith/places of worship, community organizations, SNAP offices, Indian tribal organizations, public housing, shelters, residential treatment centers, low-income health clinics, (or, other community or neighborhood settings where people “live” or live nearby)

**Learn**  
Early care and education; schools; afterschool, summer, and community youth organizations; Boys and Girls Clubs, YMCA, Cooperative Extension offices; (or, other places where people go to “learn”)

**Play**  
Parks and recreation, bicycle and walking paths, school gymnasiums and fields, county fairgrounds (or, other places where people go to “play”)

**Work**  
Worksites with low-wage workers, job training programs/TANF worksites (or, other places where people go to “work”)

**Shop**  
Large food stores (4+ registers), small food stores (< 3 registers), food banks and pantries, and farmers markets (or, other places where people “shop” for or otherwise access food)
RE-AIM Model
RE-AIM (Reach, Effectiveness, Adoption, Implementation, and Maintenance) is a useful model for planning and evaluating the dissemination and implementation of evidence-based interventions. Indicators in the Environmental Settings level of the Framework reflect a modified version of the RE-AIM model (see below). For more information on RE-AIM, visit www.re-aim.org.

<table>
<thead>
<tr>
<th>SNAP-Ed Environmental Settings Indicator</th>
<th>SNAP-Ed Evaluation Framework Definition</th>
<th>RE-AIM Model Component</th>
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<tr>
<td>ST5: Needs and Readiness</td>
<td>Sites with an identified need and/or readiness for change in organizational settings or policies.</td>
<td>MT5: Nutrition Supports; MT6: Physical Activity and Reduced Sedentary Behavior Supports</td>
</tr>
<tr>
<td>ST6: Champions</td>
<td>Community change agents who have engaged in efforts outside of SNAP-Ed programming to improve access or create appeal for nutrition and physical activity supports.</td>
<td>MT5: Nutrition Supports; MT6: Physical Activity and Reduced Sedentary Behavior Supports</td>
</tr>
<tr>
<td>ST7: Partnerships</td>
<td>Partnerships with service providers, community or organizational leaders, and SNAP-Ed representatives in settings where people eat, learn, live, play, shop, and work.</td>
<td>ST5: Needs and Readiness</td>
</tr>
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<table>
<thead>
<tr>
<th>MT5: Nutrition Supports; MT6: Physical Activity and Reduced Sedentary Behavior Supports</th>
<th>Reach</th>
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<td>Number of people who are impacted by a PSE change.</td>
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<tr>
<th>LT5: Nutrition Supports Implementation; LT6: Physical Activity Supports Implementation; LT7: Program Recognition; LT8: Media Coverage; LT9: Leveraged Resources; LT10: Planned Sustainability; LT11: Unexpected Benefits</th>
<th>Implementation</th>
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<tr>
<td>Intervention delivered with fidelity and the essential elements known to be important to the achievement of positive outcomes.</td>
<td>LT5: Nutrition Supports Implementation; LT6: Physical Activity Supports Implementation; LT7: Program Recognition; LT8: Media Coverage; LT9: Leveraged Resources; LT10: Planned Sustainability; LT11: Unexpected Benefits</td>
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<tr>
<td>Improvements (e.g., improved assessment scores) in the food environment and/or organizational changes, policies, rules, marketing, and access that make healthy choices easier.</td>
<td>LT5: Nutrition Supports Implementation; LT6: Physical Activity Supports Implementation; LT7: Program Recognition; LT8: Media Coverage; LT9: Leveraged Resources; LT10: Planned Sustainability; LT11: Unexpected Benefits</td>
</tr>
<tr>
<td>Number and average percentage increase of SNAP-Ed eligible sites/systems with a plan in place for staff, training, procedures, diversified funding, human and facility resources, and other maintenance-of-effort essentials.</td>
<td>LT5: Nutrition Supports Implementation; LT6: Physical Activity Supports Implementation; LT7: Program Recognition; LT8: Media Coverage; LT9: Leveraged Resources; LT10: Planned Sustainability; LT11: Unexpected Benefits</td>
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SNAP-Ed at the MICHIGAN FITNESS FOUNDATION
The Michigan Fitness Foundation (MFF) facilitates the delivery of SNAP-Ed programming in Michigan through a network of local subrecipient organizations, contracted organizations, and local and regional collaborations. SNAP-Ed programming is focused on nutrition education,
physical activity promotion, and PSE change strategies that help Michigan residents who are eligible for SNAP benefits lead healthier lives. Programming is behaviorally-focused, evidence-based, and combines DE and PSE change strategies.

In FY 2019, MFF SNAP-Ed programs and activities reached approximately five million Michigan citizens. MFF is currently partnering with more than 35 subrecipient organizations—called MFF SNAP-Ed Partners—that receive SNAP-Ed funding to implement nutrition education and physical activity promotion throughout Michigan. The SNAP-Ed Team at MFF provides a variety of support services to SNAP-Ed Partners and Michigan citizens eligible for SNAP benefits including, but not limited to, training and compliance support, the statewide social marketing campaign, development of nutrition education and physical activity promotion curricula and interventions, Nutrition Education Reinforcement Items (NERI), evaluation services, and Map To Healthy Living.

MFF is one of two SNAP-Ed Implementing Agencies in Michigan. The second SNAP-Ed Implementing Agency is Michigan State University Extension (MSU Extension). At MSU Extension, SNAP-Ed programs are managed by the Institute for Health and Nutrition and are implemented through the MSU Extension’s 14 districts via county offices. MDHHS, MFF, and MSU Extension work collaboratively to ensure that SNAP-Ed best meets the needs of people eligible for SNAP throughout Michigan.

Additionally, the USDA FNS encourages states to coordinate activities implemented by FNS nutrition assistance programs and initiatives. In Michigan, the Michigan State Nutrition Action Collaborative (MiSNAC) is a network of the organizations in Michigan that receive funding from the USDA FNS, who work together to connect and coordinate nutrition education programs and approaches throughout Michigan. MFF represents all of the MFF SNAP-Ed Partners in MiSNAC.

**SNAP-Ed in MICHIGAN – ORGANIZATIONAL FLOW CHART**

SNAP-Ed is maximized when the local, state, and national agencies involved with programming have defined roles and responsibilities. The chart below highlights the organizations involved with SNAP-Ed in Michigan. Additional information about the specific roles and responsibilities of these organizations can be found in the USDA SNAP-Ed Guidance.

**USDA Food and Nutrition Service**

**Michigan SNAP-Ed Plan of Work**

**State SNAP Agency**
Michigan Department of Health and Human Services

**Implementing Agency**
MFF (Subrecipient)

Local Program Sites
MFF Partners and contractors

**Implementing Agency**
MSU Extension (Subrecipient)

Local Program Sites
MSU Extension
(14 districts via county offices)

Michigan’s annually submitted SNAP-Ed Plan of Work is developed by the Michigan Fitness Foundation and Michigan State University Extension, in cooperation with Michigan Department of Health and Human Services. It includes the MFF SNAP-Ed Partner proposed programs.
PROGRAM FUNDING

All programming approaches must comply with SNAP-Ed program financial and cost policies, including policy on reasonable and necessary expenditures. SNAP-Ed funding should not be considered as substitute funding for programs that have other funding streams or that move away from the mission of FNS and the goals and focus of SNAP-Ed.

Funding for Michigan SNAP-Ed is provided by the USDA through MDHHS. MFF SNAP-Ed Partners expand the capacity of Michigan’s SNAP-Ed Program by maximizing the resources available for nutrition and physical activity initiatives targeting SNAP eligible people. Michigan SNAP-Ed funding is distributed on a cost-reimbursement basis, meaning an organization incurs and pays the cost and then gets reimbursed for that cost as long as it meets the reasonable and necessary policy.

What is the SNAP-Ed Grant Award?

Your grant award funds are the expenses your organization will expend to implement the SNAP-Ed programming activities outlined in your proposal. You will submit monthly invoices and program highlights for reimbursement of these expenditures.

Are There Any Limits to the Amount of Federal Funds That Can Be Requested?

Due to limited resources for SNAP-Ed in Michigan, the proposal process is competitive. Requests to expand programming must come with clear evidence of need, definition of planned outcome impact, and evidence of efficiency in delivery and management.

SNAP-Ed TARGET AUDIENCES

When your organization applies for Michigan SNAP-Ed funding, you identify the target audience(s) for the various interventions and activities you will implement. It is critical that your programming focus on the audiences identified in your proposal. According to USDA regulation, these target audiences fall into four categories.

Alternate delivery sites for SNAP-Ed activities and interventions that do not meet the general low-income categories described below may be submitted individually to MFF for pre-approval.

Refer to the category descriptions below to determine if your proposed program target audience qualifies.

**Category 1 – Income-based:**
- Persons eligible for other means-tested Federal assistance programs such as Supplemental Security Income (SSI), the WIC Program, or TANF; and
- Persons typically not eligible for SNAP such as incarcerated persons, residents of nursing homes, boarders, or college/university students are ineligible for SNAP-Ed.

**Category 2 – Qualifying locations:**
- Persons at qualifying locations that serve low-income individuals such as food banks, food pantries, soup kitchens, public housing, SNAP/TANF job readiness program sites, and other such sites.

**Category 3 – Locations serving low-income populations:**
- Persons at other venues when it can be documented that the location/venue serves generally low-income persons where at least 50 percent of persons have gross incomes at or below 185 percent of poverty guidelines/thresholds. This would
include, for example, persons residing or schools or childcare centers located in census tract areas or other defined areas where at least 50 percent of persons have gross incomes that are equal to or less than 185 percent of the poverty threshold, or children in schools where at least 50 percent of children receive free and reduced priced meals.

- Venues/locations identified in qualified census tracts.
  - For a statewide view of eligible tracts, go to map2healthyliving.org and follow these steps:
    1. In the “What to Look For” section, scroll to the Geographic section and click the “Eligible Census Tract” layer; and
    2. Click “Go”.

**Category 4** – Retail locations serving low-income populations:

- Persons shopping in grocery stores when the store has been documented to redeem average monthly SNAP benefits of $50,000 or more, or persons shopping in grocery stores located in census tracts where at least 50 percent of persons have gross incomes that are ≤185 percent of the poverty threshold. States may submit proposals to their respective Regional Office with alternate methods for defining grocery stores that serve the low-income target population as potentially eligible for SNAP-Ed. For example, in rural areas, a particular store may not redeem a monthly average of $50,000 in SNAP-benefits but may be serving the majority of the SNAP low-income population or be the only grocery outlet in the community for the entire population, including the low-income population. When SNAP-Ed receipts are less than $50,000 monthly, a store may be able to show average monthly SNAP redemptions that are significant compared to overall sales or some other indication that the low-income population shops at that location.

**SMART OBJECTIVES**

The evaluation of your SNAP-Ed program is based on SMART objectives. These objectives describe the change you plan to achieve with your SNAP-Ed programming. SMART objectives will be developed in collaboration with your assigned MFF evaluator as a component of your evaluation plan and include objectives for PSE, direct education, and process evaluation.

**ELIGIBILITY and REQUIREMENTS**

Eligibility criteria and requirements for MFF SNAP-Ed Community Impact Grant: Request for Proposals funding can be found in the Proposal Instructions, Letter of Qualification, SNAP-Ed Compliance, and Evaluation Assurances.

High-quality proposals should demonstrate the following:

- Ability, capacity, and expertise to successfully and independently:
  - Assess community needs and inequities that impact healthy eating and active living of SNAP-Ed eligible people, thinking holistically about these challenges and the approaches to address them.
  - Design a tailored program approach based on a systems-level view to community change.
  - Deliver comprehensive, community wrap-around programming that balances policy, systems, and environmental change (PSE) efforts for community-based systems that support healthy eating and active living with complementary direct education (DE) intervention(s) focusing on individual behavior change for healthy eating and physical activity.
Manage and monitor programming, including ensuring that selected intervention(s) are implemented with fidelity.
Implement a required, program-specific process and outcome evaluation plan developed in collaboration with MFF.
- Expertise in improving the health of Michigan's most vulnerable populations.
- Embedment in the focus community(ies), as evidenced by:
  - Positive relationships with local SNAP-Ed eligible population(s).
  - Effective community engagement strategies or plans.
  - Staff that reflect (in respect to lived experience, race/ethnicity, culture, age, etc.), and have a nuanced understanding of the focus community(ies).
  - Strong local network of partner organizations.
- Robust multi-sector collaboration work and knowledge of how to apply it to PSE change efforts.
- Trained and qualified program team with:
  - Content expertise and skills to lead PSE change efforts and implement direct nutrition education and physical activity promotion.
  - Understanding of basic evaluation principles such as setting goals and objectives, defining outcome measures, implementing a data collection plan.
  - Responsive supervision and oversight support.
- Commitment to continuous program improvement, including use of evaluation to inform program improvement.
- Proven record of effectively monitoring grant compliance and completing grant requirements.
- Forward-thinking perspective with a vision for sustainable community change.
- Organizational investment in and dedication to SNAP-Ed goals.

Partners are selected based on the identified needs of SNAP recipients in Michigan and the amount of funds available. MFF, as a Michigan SNAP-Ed Implementing Agency, includes programs recommended to receive funding in the Michigan SNAP-Ed Plan of Work, which is reviewed by MDHHS who determines what is included and submitted to USDA FNS.

The USDA FNS has final approval for the Michigan SNAP-Ed Plan of Work. In the past, this approval has been in September. Note: At the point of the USDA notification of the FY 2021 grant award to Michigan, FNS may request project amendments.

**REIMBURSEMENT and REPORTING**
MFF SNAP-Ed Partners are subrecipients of federal USDA SNAP-Ed funds (Federal pass-through funds). As subrecipients of federal funds, all MFF Partner funding is managed on a cost-reimbursement basis. This means your organization incurs expenses by implementing the approved activities from your proposal, and these expenditures are reimbursed to you upon accurate completion of monthly invoices. It is also important for your organization to recognize the cash flow management that is required with cost-reimbursement awards. Refer to the reimbursement process below for more information.

You will be reimbursed for allowable program and administrative costs that are reasonable and necessary to operate your approved nutrition education and physical activity promotion programs and related PSE efforts. **Program activities and administrative activities must be allowable through SNAP-Ed. If you have questions regarding the allowability of activities, please refer to the Program Parameters section.** Allowability of administrative costs is governed by both SNAP-Ed Guidance and 2 CFR 200 OMB Uniform Guidance. Organizations
are advised to seek professional counsel on organization-wide allocation of administrative expenses prior to reimbursement.

MFF administers SNAP-Ed under a prime subrecipient agreement with MDHHS. As such, Federal and State agency contractual terms and conditions will be passed down to each subrecipient. If awarded, a subrecipient agreement initiated by MFF must be fully executed before any reimbursement can begin. MFF uses electronic fund transfers to process reimbursements. Other arrangements will be considered on an individual basis.

Timely submission of invoices and reports is considered in the compliance history for returning MFF SNAP-Ed Partners. Individual mitigating circumstances will continue to be addressed on an individual program basis for all subrecipients.

Contracts
It is important to recognize that there are multiple layers of approvals that make up the contract process. Before a contract can be developed, your proposed SNAP-Ed program—the basis of your contract and a key part of Michigan’s SNAP-Ed Plan of Work—goes through the following approval process:

1. Your proposal including your proposed SNAP-Ed program is submitted to MFF and reviewed for inclusion in Michigan’s SNAP-Ed Plan of Work.
2. MFF and MSU Extension work with MDHHS to develop and submit Michigan’s SNAP-Ed Plan of Work to MDHHS for approval.
3. MDHHS reviews, approves, and submits the Plan of Work to the USDA for approval.
4. The USDA reviews and approves the Plan of Work.
5. A subrecipient contract is established between MDHHS and MFF.
6. MFF establishes a subrecipient contract with you as an MFF SNAP-Ed Partner.

Special Note: Adjustments to your grant award amount may be made at any point in the approval process above. Once the USDA approves Michigan’s SNAP-Ed Plan of Work and the final project summaries and budgets are in place, you will receive written notification from MFF of the approved amount of your grant award.

Required Reporting (Specific dates will be posted by October 1, 2020):

Monthly Submission of:
- Program Highlights;
- Invoices and supporting documentation for reimbursement; and
- Time and effort reporting, if requested (see the Program Parameters section for more detail).

Annual Submission of:
- Mid-Year Report (summative in nature and reporting activities for October 1 – March 31);
- Final Report; and
- Equipment Inventory.

SNAP-Ed TRAINING IN MICHIGAN
MFF offers a variety of training for SNAP-Ed Partners’ lead staff, nutrition educators/facilitators, physical educators, and others who implement SNAP-Ed programming. MFF covers registration fees, meals, and hotel rooms for multi-day training or if you are traveling from a distance. You should include staff time and effort and mileage in your budget. You should plan and budget
accordingly. Trainings may be added or eliminated based on grant requirements and the needs of the Partners.

For more information on SNAP-Ed trainings, including dates, locations, and registration, please visit snap-ed.michiganfitness.org/trainings.

**ABBREVIATIONS**

- CACFP – Child and Adult Care Food Program
- CSFP – Commodity Supplemental Food Program
- DE – Direct Education
- EARS – Education and Administrative Reporting System
- FNS – Food and Nutrition Service
- FPG – Federal Poverty Guidelines (sometimes referred to as FPL, or Federal Poverty Level)
- FY – Fiscal Year
- MDHHS – Michigan Department of Health and Human Services
- MFF – Michigan Fitness Foundation
- MiHOTM – Michigan Harvest of the Month™
- MiSNAC – Michigan State Nutrition Action Coalition
- MSU Extension – Michigan State University Extension
- NERI – Nutrition Education Reinforcement Item
- OMB – Office of Management and Budget
- OMB Uniform Guidance – Uniform Guidance (UG), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- PA – Physical Activity (always relating to physical activity promotion)
- PSA – Public Service Announcement
- PSE – Policy, Systems, and Environmental (Change)
- SEM – Social-Ecological Model
- SNAP – Supplemental Nutrition Assistance Program (Formerly known as “Food Stamps,” referred to as the “Food Assistance Program” or “FAP” in Michigan)
- SNAP-Ed – Supplemental Nutrition Assistance Program Education
- TANF – Temporary Assistance for Needy Families
- TEFAP – The Emergency Food Assistance Program
- USDA – United States Department of Agriculture
- WIC – (Special Supplemental Nutrition Program for) Women, Infants and Children
DEFINITIONS

Administrative Costs refer to the financial costs characterized by the following types of activities:

- Dollar value of salaries and benefits associated with staff time dedicated toward the administration and administrative oversight of the SNAP-Ed program;
- Cost of training for performing administrative functions like record keeping and accounting, etc.;
- Cost of financial reporting SNAP-Ed activities including invoice preparation (does not include evaluation activities);
- Operating costs;
- Indirect costs for those administrative staff not covered above;
- Other overhead charges associated with administrative expenses (e.g., space, human resources, etc.);
- Staff supervision and hiring; and
- Business office staff functions.

Allocable Costs are expenses that must be correlated with the program benefits obtained by incurring them. If a cost benefits multiple programs or activities, a portion of the cost must be allocated to all programs receiving the benefit of the expense. Cost allocation becomes an important issue with SNAP-Ed guidance that allows more broadly-based programming in communities where specific targeting for SNAP-Ed qualifications may be less precise. Plan to work closely with your MFF SNAP-Ed Project Manager when planning allocable costs.

Allowable Expenditures are purchases and activities that can be reimbursed. They must:

- Meet the Michigan SNAP-Ed guidelines;
- Be included in your approved proposal;
- Be included in your approved budget;
- Be pre-approved as appropriate; and
- Be “necessary and reasonable” for the accomplishment of approved program objectives.

Behavior indicates action rather than knowledge or attitudes.

Behaviorally-Focused Nutrition Messages are those that are (a) related to healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example, encouraging breast feeding practices or physical activity; (c) related to the environmental impact of dietary practices, including safe food handling, promoting community walking groups; (d) related to food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk, and (e) food security such as applying for nutrition assistance programs (i.e., WIC, SNAP, Child Nutrition Programs, Food Distribution Programs, etc.).

Capital Equipment: See Equipment/Capital.

Census Tracts are small, relatively permanent, geographic entities within counties (or the statistical equivalent of counties) delineated by a committee of local data users. Generally, census tracts have between 2,500 and 8,000 residents and boundaries that follow visible features. To view a complete map of Michigan census tracts, including SNAP-eligible (“qualified”) census tracts, visit Map to Healthy Living at map2healthyliving.org.
Collective Impact is the commitment by a group of actors from different sectors to a common agenda to solve complex social problems such as healthy eating or obesity prevention. Collective impact requires five conditions for success: a common agenda, shared measurement, mutually reinforcing activities based on a common action plan, continuous communication, and backbone support to guide the group’s actions, provide technical support, and mobilize resources.

Direct Education (DE) occurs when a participant is actively engaged in the learning process with an educator or interactive media which is evidence-based or practice-tested. To qualify as direct education, education must be at least 20 minutes in length and associated reach data must be collected or estimated. Time and effort associated with direct education include:

- Face-to-face education or education via interactive media;
- Preparation time for program delivery; and
- Associated data collection and evaluation activities.

EARS (Education and Administrative Reporting System) is an annual data and information collection process completed by Supplemental Nutrition Assistance Program (SNAP) State Agencies. It collects uniform data and information on nutrition education activities funded by SNAP.

Equipment/Capital is non-expendable property having a value of $5,000 or more per item at the time of acquisition. All capital equipment purchases must be pre-approved by MDHHS and MFF, even if they were approved as part of your proposal. These items must be included in the annual Equipment Inventory.

Equipment/Non-capital is property having a value of less than $5,000 per item at the time of acquisition. This equipment is generally treated as supplies and is not required to be included in any property management system. Treatment and disposition of non-expendable equipment should be done in accordance with state or local property management requirements. MFF defines non-capital equipment as items that plug in or recharge by plugging in that cost less than $5,000 per piece. These items must be included in the annual Equipment Inventory.


Formative: Involves pre- and ongoing-testing of consumer and intermediary elements within program delivery, including messaging, consumer communication materials, training and intervention aids, and evaluation instruments (may be used to adapt elements of an existing, evidence-based intervention to a new audience, geographic area, or setting);

Process: Can involve such measures as tracking the number of materials distributed, counting the number of clients reached, effectiveness of alternate methods of delivering services, and/or barriers to implementing the intervention. It helps to assure fidelity that an evidence-based intervention is delivered as designed and thus likely to result in the expected outcomes;

Outcome: Demonstrates changes that occur in the presence of an intervention but do not establish cause and effect conclusions; and
Impact: Indicates how effective the intervention was in changing the target populations’ behavior.

Evidence-based Approach for Nutrition Education and Obesity Prevention is defined by USDA as the integration of the best research evidence with the best available practice-based evidence. The best research evidence refers to rigorous nutrition and public health nutrition research, including systematically reviewed scientific evidence. Practice-based evidence refers to case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential.

Food Bank is a public or charitable institution that maintains an established operation involving the provision of food or edible commodities, or the products of food or edible commodities, to food pantries, soup kitchens, hunger relief centers, or other food or feeding centers that, as an integral part of their normal activities, provide meals or food to needy persons on a regular basis.

Food Insecurity is a household-level economic and social condition of limited or uncertain access to adequate food. The condition is assessed in the USDA food security survey and represented in USDA food security reports. For an interactive map of adult and child food insecurity near you, visit http://feedingamerica.org/hunger-in-america/hunger-studies/map-the-meal-gap.aspx.

Food Pantry is a public or private non-profit organization that distributes food, including food from sources other than the USDA, to low-income and unemployed households to relieve situations of emergency and distress.

Grant Award is the amount stated in your conditional award letter that has been approved by MFF and MDHHS for inclusion in the Michigan SNAP-Ed Plan of Work. It is the dollar amount that the subrecipient organization may request for reimbursement through MFF after a contract has been fully executed.

Hunger is an individual-level physiological condition that may result from food insecurity.

Indirect Cost Rate is a tool an organization can use for determining the proportion of indirect costs each program should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base.

Interventions are a specific set of evidence-based, behaviorally-focused activities and/or actions to promote healthy eating and active lifestyles. They can be research-tested or practice-tested and generally have core elements and multiple components. They provide ways of intervening that are likely to have a public health impact.

• Research-tested interventions have been published in the peer-reviewed literature.

• Practice-tested interventions have evidence derived from practice in the form of evaluation data or reports.

• Emerging interventions are practice-based interventions that have been successfully implemented and show promise based on their underlying theory and approach but have not yet been fully evaluated in the field.
Low-Income Persons are people participating in or applying for SNAP, as well as people with low financial resources defined as gross household incomes at or below 185 percent of the Federal Poverty Guidelines.

- National School Meal Program data on number of children eligible for free- and reduced-price meals, which represents children in families with incomes at or below 185 percent of the Federal Poverty Guidelines, can be used.
- Census data identifying areas where low-income persons reside are available data sources that can be used to identify low-income populations.
- Participation in WIC may also be used as a proxy for low-income since WIC participants have gross family incomes at or below 185 percent of the Federal Poverty Guidelines.

Materials, Interventions, and Curricula When budgeting, these are the materials required to implement SNAP-Ed interventions approved in your proposal that move participants toward your program objectives (e.g., curriculum, food tasting supplies, NERI). Some training costs may fall into this category.

Means-tested Programs are those that require the income and/or assets of an individual or family to fall below specified thresholds in order to qualify for benefits. There may be additional eligibility requirements to receive these programs, which provide cash and noncash assistance to eligible individuals and families. For SNAP-Ed, the threshold is at or below 185 percent of the Federal Poverty Guidelines.

Multi-level Interventions reach the target audience at more than one level of the SEM and mutually reinforce each other. Multi-level interventions generally are thought of as having three or more levels of influence.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs of individuals and/or target populations in the community.

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


Outcomes are benefits for participants during or after their involvement with a program. Outcomes may relate to knowledge, skills, attitudes, values, behaviors, conditions, or status. Examples of outcomes include greater knowledge of nutritional needs, increased consumption of vegetables, and increased physical activity. Behavioral outcomes, such as increased physical activity and consumption of fruits and vegetables, are expected in SNAP-Ed.

Outputs are products of a program’s activities, such as the number of meals provided, classes taught, brochures distributed, or participants served. Another term for “outputs” is “units of service.” A program’s outputs should produce desired outcomes for the program participants.
Policy, Systems, and Environmental Change (PSE):

Policy: A written statement of an organizational position, decision, or course of action. Ideally policies describe actions, resources, implementation, evaluation, and enforcement. Policies are made in the public, non-profit, and business sectors. Policies will help to guide behavioral changes for audiences served through SNAP-Ed programming.

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

Environmental: Includes the built or physical environments which are visual/observable, but may include economic, social, normative, or message environments. Modifications in settings where food is sold, served, or distributed may promote healthy food choices. Signage that promotes the use of stairwells or walking trails may increase awareness and use of these amenities. Social changes may include shaping attitudes among administrators, teachers, or service providers about time allotted for school meals or physical activity breaks. Economic changes may include financial disincentives or incentives to encourage a desired behavior, such as purchasing more fruits and vegetables. Note that SNAP-Ed funds may not be used to provide the cash value of financial incentives.

Practice-tested Evidence refers to evidence from case studies, pilot studies, and evidence from the field on nutrition education interventions that demonstrate obesity prevention potential. Evidence from the field includes evidence from emerging strategies and interventions.

Project Supplies (consumables) When budgeting, project supplies are identified as the supplies that are used when implementing your SNAP-Ed programs and activities. Typically, they are not specifically detailed in a lesson plan (e.g., red construction paper for a specific SNAP-Ed activity), but it is expected that they are 100 percent dedicated to SNAP-Ed use. Some training costs may fall into this category. General office or desk supplies are not allowable SNAP-Ed project supplies.

Public Education Outreach Message is a brief message providing information on the availability, benefits, and application procedures for SNAP, preferably with information on local application sites (or a toll-free number or other useful information on how to find services). Since SNAP-Ed is provided to low-income persons who might not be participating in SNAP, an important component of the nutrition message must be to provide an educational message about the availability and benefits of the program and how to apply. This should be done in the context of nutrition education, meaning that SNAP should routinely be referenced in nutrition education sessions and on materials as an important source of nutrition assistance to help low-income persons achieve a better diet.

Public Health Approach as defined by CDC is a four-step process that is rooted in the scientific method. It can be applied to violence and other health problems that affect populations. The public health approach steps are: define and monitor the problem; identify risk and protective factors; develop and test prevention strategies; and assure widespread adoption.
Learn more about the public health approach here: cdc.gov/violenceprevention/pdf/ph_app_violence-a.pdf

Public Health Interventions are community-focused, population-based interventions aimed at preventing a disease or condition, or limiting death or disability from a disease or condition, according to the CDC.

Public Housing as defined by the U.S. Department of Housing and Urban Development is apartments for low-income people, operated by local housing agencies.

Qualified Census Tract is a census tract where greater than 50 percent of the population has incomes at or below 185 percent of the Federal Poverty Guidelines. To identify qualified census tracts in Michigan, visit map2healthyliving.org.

RE-AIM is a framework designed to enhance the quality, speed, and public health impact of efforts to translate research into practice in five steps: 1. Reach your intended target population; 2. Efficacy or effectiveness; 3. Adoption by target staff, settings, or institutions; 4. Implementation consistency, costs, and adaptations made during delivery; 5. Maintenance of intervention effects in individuals and settings over time.

Reasonable and Necessary All SNAP-Ed program expenditures must meet the following reasonable and necessary guidelines:

- Reasonable Costs:
  - Provide a benefit generally commensurate with the costs incurred;
  - Are in proportion to other program costs for the reach and function that the costs serve (e.g., if your total award is $100,000 and you want to do a one-day event that costs $25,000, these costs are likely out of proportion when considering your full budget. However, if the activity costs $1,000, it may be considered in proportion to the total budget and therefore reasonable.);
  - Are appropriate priority expenditures when considering the other demands of your program; and
  - Carry nutrition education messages consistent with the SNAP-Ed objectives and reinforce the most current Dietary Guidelines for Americans.

- Necessary Costs:
  - Are incurred to carry out essential program and administrative functions;
  - Cannot be avoided without adversely affecting program operations; and
  - Do not duplicate existing efforts in your community.

Secondary Prevention Interventions are activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. One example of this would be diabetes teaching or screening, weight-loss counseling, or screening or treatment of eating disorders. Secondary prevention interventions are not allowable costs in SNAP-Ed.

SNAP-Ed Eligibles is a label that refers to the target audience for SNAP-Ed, specifically SNAP participants and low-income individuals who qualify to receive SNAP benefits or other means-tested Federal assistance programs, such as Medicaid or Temporary Assistance for Needy Families. It also includes individuals residing in communities with a significant low-income population.
SNAP Nutrition Education and Obesity Prevention Services are a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, that have been shown to facilitate adoption of food and physical activity choices and other nutrition-related behaviors. These strategies are conducive to the health and well-being of SNAP participants and low-income individuals eligible to receive benefits under SNAP or other means-tested Federal assistance programs, in addition to individuals residing in communities with a significant low-income population. Nutrition education and obesity prevention services are delivered through multiple venues, often through partnerships, and involve activities at the individual, interpersonal, community, and societal levels. Acceptable policy level interventions are activities that encourage healthier choices based on the current Dietary Guidelines for Americans. Intervention strategies may focus on increasing or limiting consumption of certain foods, beverages, or nutrients consistent with the Dietary Guidelines for Americans.

Social-Ecological Model is a framework that illustrates how various sectors of society (e.g., individuals/families, communities/organizations, health professionals/health systems, and policy makers) combine to affect an individual’s food and physical activity choices.

Social Marketing as described by CDC is “the application of commercial marketing technologies to the analysis, planning, execution, and evaluation of programs designed to influence voluntary behavior of target audiences in order to improve their personal welfare and that of society.” Due to the critical requirement that effective social marketing include aligned messages, all social marketing initiatives of the MFF SNAP-Ed Partners will be coordinated and directed by MFF.

Soup Kitchen is a public or charitable institution that, as an integral part of the normal activities of the institution, maintains an established feeding operation to provide food to needy persons on a regular basis.

Strategies provide broad approaches about the best options available for intervening.

Summative Research is an important feature of any comprehensive intervention and evaluation plan. It assesses the short- and long-term results of a program and seeks to measure the changes brought about by the program based on the published evidence and data supporting the intervention’s use. Summative research questions ask:

- What are the critical outcomes you are trying to achieve?
- What impact is the program having on its clients, its staff, its umbrella organization, and its community?
- What unexpected impact has the program had?

Unallowable Expenditures are purchases and activities that are not allowable under MFF’s SNAP-Ed guidelines and therefore are not eligible for reimbursement.

Unduplicated Participant Reach is the number of individuals who receive any SNAP-Ed direct nutrition education. The first contact with a SNAP-Ed participant is reach. An individual that participates in more than one SNAP-Ed intervention may be counted as unduplicated for the first contact for each intervention.
PROGRAM PARAMETERS

This document references the current FY 2020 USDA SNAP-Ed Guidance.
Updated regulations and guidance will be issued by USDA and will replace previous versions. All SNAP-Ed projects will need to adjust programming for compliance when applicable.

REASONABLE and NECESSARY
All SNAP-Ed program expenditures must meet the “reasonable and necessary” guidelines.
• Reasonable Costs:
  o Provide a benefit generally commensurate with the costs incurred;
  o Are in proportion to other program costs for the reach and function that the costs serve (e.g., if your total award is $100,000 and you want to do a one-day event that costs $25,000, these costs are likely out of proportion when considering your full budget. However, if the activity costs $1,000, it may be considered in proportion to the total budget and therefore reasonable);
  o Are appropriate priority expenditures when considering the other demands of your program; and
  o Carry nutrition education messages consistent with the SNAP-Ed objectives and reinforce the most current Dietary Guidelines for Americans.
• Necessary Costs:
  o Are incurred to carry out essential program and administrative functions;
  o Cannot be avoided without adversely affecting program operations;
  o Are determined based on an inventory assessment of current items;
  o Follow established procurement practices and policies; and
  o Do not duplicate existing efforts in your community.

REQUIREMENTS, CONSIDERATIONS, ALLOWABLES, UNALLOWABLES
You are responsible for understanding all of the MFF SNAP-Ed requirements, considerations, allowables, and unallowables.
• REQUIREMENTS: These are things you must do when considering purchases and implementing SNAP-Ed activities in order to be reimbursed for them.
• CONSIDERATIONS: These are things you should know and consider when implementing program activities.
• ALLOWABLES: These are purchases and activities that can be reimbursed or used that:
  o Meet the SNAP-Ed guidelines as described in allowables;
  o Are included in your approved proposal; and
  o Are included in your approved budget.
• UNALLOWABLES: These are purchases and activities that are not allowable under MFF’s SNAP-Ed guidelines for reimbursement as described in unallowables.

CIVIL RIGHTS and NONDISCRIMINATION

REQUIREMENTS:
Nondiscrimination Statement:
• Documents developed, adapted, or reprinted for use with SNAP-Ed participants must have the following shortened nondiscrimination statement: “This institution is an equal opportunity provider.” The full USDA Nondiscrimination Statement is rarely, if ever, required for SNAP-Ed. Visit snap-ed.michiganfitness.org/nondiscrimination-and-credit-statements for the USDA Nondiscrimination Statements and examples to help you determine which statement is required.
• The statement must be printed in a reasonable text size.
• If an agency has additional wording or information to be included, it must be added after the USDA statement; the added information must be separated and not included within the USDA paragraphs or wording.

Civil Rights Posters:
• All SNAP-Ed programs must have an "And Justice for All" poster visible to participants during each SNAP-Ed program activity.
• MFF has posters available as needed, upon request.

Civil Rights Training:
  o Civil Rights training is required each fiscal year for all frontline staff and those who supervise frontline staff. “Frontline staff” refers to anyone who interacts with SNAP-Ed participants. To meet this requirement, all frontline staff and supervisors must:
    o Complete the self-paced, read-along training; and
    o Submit the Civil Rights Training Confirmation Form online.
  • Civil Rights training must be completed by October 30th or within 30 days of hire for new staff.
  • The Civil Rights training and confirmation form can be found at snap-ed.michiganfitness.org/civil-rights.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• “And Justice for All” posters may be permanently displayed in specific locations where SNAP-Ed program activities are repeatedly conducted; and
• Posters can be posted during a SNAP-Ed activity and taken down after the activity.

Unallowable
• Posters should not be displayed in common areas of a SNAP-Ed program site, unless programming is conducted in those common areas.

CONTRACTOR and FEE-FOR-SERVICE PROVIDERS

REQUIREMENTS:
The costs associated with contractor or fee-for-service provider duties:
• Must be reasonable and necessary;
• Must be consistent with specific SNAP-Ed allowable deliverables associated with objectives identified in your approved proposal and budget;
• Must be documented with an invoice or receipts, proof of payment for all costs claimed, and include a list of deliverables, service period, and rate of pay. Work must be completed prior to payment; and
• A quote from an adequate number of sources (more than one) or sole source justification must be obtained when engaging contractors or fee-for-service providers
whose services range from $10,000 to $250,000. Documentation for procuring services must be maintained with grant records.

ALLOWABLE & UNALLOWABLE COSTS:

Allowable
- Individuals receiving a fee-for-service when specific deliverables, service period, and hourly rate are established;
- Food service staff time is only allowable with a memo from the school confirming the work being done is above and beyond the staff member’s normal time and pay and supports SNAP-Ed approved programming; and
- Teacher or public employee time (or other contracted staff) is only allowable with a memo from the school or employer confirming the work being done is above and beyond the normal time and pay on contract.

Unallowable
- Stipends;
- Incentives;
- A professional delivering nutrition education when a rate of pay is commensurate with his/her credentials as opposed to the duties he/she is performing;
- Contractors whose work extends beyond the scope of SNAP-Ed and is not allocated; and
- Contractors’ scope of work is outside of what’s defined in your SNAP-Ed proposal and budget.

EQUIPMENT

REQUIREMENTS:
- All equipment that has been approved in your program proposal and budget must be purchased by June 30th of the contract year.
- If the equipment is also being used to support other activities (outside of SNAP-Ed), or is being used by a staff person who is not 100 percent SNAP-Ed, the cost must be allocated. This includes computers, printers, laptop batteries, etc.
- Food demonstration equipment must be allocated to reflect only the SNAP-Ed portion if other programs or projects use the equipment.
- Any equipment not addressed in the Program Parameters must be pre-approved prior to purchasing.
- Equipment purchased with SNAP-Ed funds must be returned at the request of MFF if the program is terminated or the Partner no longer participates in SNAP-Ed.
- All equipment purchased with SNAP-Ed funds must be logged into an Equipment Inventory and submitted to MFF with the Year-end Report.
- All equipment costing $5,000 or more is considered capital equipment and must be pre-approved in writing by MFF, even if it is approved in your FY 2020 proposal and budget.

CONSIDERATIONS:
- Equipment is defined as anything that plugs in or is re-charged by plugging in.

ALLOWABLE & UNALLOWABLE COSTS:

Allowable
- Equipment that is reasonable, necessary, and integral to the nutrition education activity;
• Purchase of electronic equipment (such as computers, TV, VCR, cameras, etc.) that costs $4,999 or less and specifically approved in your proposal and budget, and with written pre-approval by MFF before purchase;
• Electronic equipment purchased for someone not working 100 percent on SNAP-Ed must be allocated based on the person’s percent dedication to SNAP-Ed;
• Purchase of non-commercial-grade cooking or food demonstration equipment used to conduct nutrition education (e.g., a blender may be purchased to use when conducting food demonstrations), small kitchen appliances, only with justification of reasonable and necessary and pre-approval (as appropriate) by MFF; and
• Kitchen equipment and dishes necessary for food storage, preparation, and demonstration purposes, with justification of reasonable and necessary and pre-approval (as appropriate) by MFF.

Unallowable
• Purchase of food service equipment for food service use;
• Medical equipment;
• Cell phones; and
• Walkie talkies and/or handheld two-way radios.

EVALUATION

REQUIREMENTS:
• Implement the SNAP-Ed funded program evaluation plan as provided by MFF. (Note: MFF will perform data analysis for local program and statewide evaluation.)
• Dedicate staff time and effort to evaluation activities. These activities must be included in the ‘Description of SNAP-Ed Duties’ in the ‘Staffing Tab’ and reflected in the FTE associated with SNAP-Ed work in your budget worksheet. Do not include personnel expenses associated with evaluation activities in the ‘Program Expenses Tab’ in your budget worksheet.
  o Local SNAP-Ed program leads are responsible for overseeing implementation of program evaluation; working with the MFF SNAP-Ed Team on evaluation activities; and the application of findings and results, etc.
  o Local SNAP-Ed program staff are responsible for survey distribution, data collection, etc.
• Local and statewide program evaluation must focus only on evaluating SNAP-Ed activities and assessing the effectiveness of SNAP-Ed interventions approved in your project summary and budget included with your contract.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• Evaluation activities that correspond to approved SNAP-Ed SMART objectives;
• Needs assessment/evaluations of minimal or no cost that directly contributes to SNAP-Ed program planning and are pre-approved by MFF; and
• Reimbursement for reasonable and necessary personal costs (such as childcare, meals, lodging, and transportation) for SNAP-Ed recipients to actively participate in focus groups, needs assessments, and advisory groups to inform and improve SNAP-Ed effectiveness. Allowable costs for focus group participants are intended to reimburse for incurred costs, not to provide a financial incentive for participation.

Unallowable
• Payment to subjects for their participation in research/evaluation studies;
• Incentive items or payments to encourage attendance at focus groups or evaluations;
• Evaluation that does not focus on SNAP eligible populations;
• Research studies;
• Costs associated with surveillance or surveys of the general population that are not allocated based on the number of likely SNAP eligible respondents;
• Community needs assessments beyond the scope of SNAP-Ed efforts; and
• Time and effort to support unallowable SNAP-Ed evaluation activities and evaluation activities not pre-approved by MFF.

FARMERS MARKETS
Farmers Markets offer multiple opportunities to partner with SNAP-Ed providers. States have the flexibility to implement PSE efforts using multi-level interventions for nutrition education and obesity prevention services at farmers markets. Examples include:

• Working to bring farmers markets to low-income areas, such as advising an existing market on the process for obtaining Electronic Benefits Transfer (EBT) machines to accept SNAP benefits;
• Providing obesity prevention interventions at farmers markets serving low-income communities;
• Partnering with organizations that offer incentives for the purchase of fresh produce at farmers markets;
• Conducting food demonstrations and sharing appropriate recipes with shoppers; and
• Consultation and training with farmers and farmers market managers on increasing access to and promotion of fruits and vegetables, whole grains, and low-fat dairy.

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

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

ALLOWABLE & UNALLOWABLE COSTS:
Unallowable
• Operation of any food assistance benefit machine (e.g., running EBT, DUFB, etc.); and
• License or permit fees for farmers markets.

FOOD DEMONSTRATIONS and FOOD TASTINGS

REQUIREMENTS:
• All staff who provide food tastings or cooking demonstrations must be supervised by a staff member who is ServSafe certified. The ServSafe certified staff must ensure those who are conducting tastings or demonstrations comply with all state and local food laws and safety standards. In addition, local health department guidelines for conducting community food tastings must be followed.
o MFF provides in-person ServSafe trainings, self-study options, and proctored certification exams to SNAP-Ed Partners. To see a schedule of upcoming ServSafe trainings, visit snap-ed.michiganfitness.org/servsafe.

- Food tastings and cooking demonstrations must support an intentional nutrition education lesson and include a nutrition education message aligned with an approved intervention.
- Food tastings may be done without cooking demonstrations to encourage participants to try new foods.
  o In this case, the tasting should be prepared by nutrition educators in advance.
  o If using pre-packaged, single servings of food for a tasting, the servings must be quartered or halved to meet allowable small taste requirements (see below).
- Food tastings must provide only a small taste (¼ to ½ serving), not an entire snack, meal, or serving.
  o Serving sizes are different for different audiences. It is your responsibility to understand proper serving sizes for the audiences you work with and ensure that only a small taste is provided.
  o Multiple tasting opportunities of foods in the same food group must collectively equal less than 1 serving for that food group.
    ▪ For example, if a tasting is completed during a school-wide event reaching 9 – 13-year-old children to reinforce the consumption of fruits and four unique raw fruits are offered during the same sitting, the total amount of fruits provided must be less than or equal to ½ - ¾ cup raw fruits, or 1 total serving from the fruit group.

<table>
<thead>
<tr>
<th>FRUITS</th>
<th>Daily Recomm.</th>
<th>Serving Size</th>
<th>Tasting Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Children 4 - 8 years old</td>
<td>1 - 1 ½ cup</td>
<td>½ cup raw, 2 Tbsp. - ½ cup canned, 2 ounces juice</td>
<td>2 Tbsp. – ½ cup raw, 2 Tbsp. canned, 1 ounce juice</td>
</tr>
<tr>
<td>Children 9 - 13 years old</td>
<td>1 ½ cups</td>
<td>¼ - ¾ cup raw, 2 Tbsp. - ½ cup canned, 2 ounces juice</td>
<td>2 Tbsp. – ½ cup raw, 2 Tbsp. canned, 1 – 2 ounces juice</td>
</tr>
<tr>
<td>Youth 14 - 18 years old</td>
<td>1 ½ - 2 cups</td>
<td>1 cup raw, ½ cup canned, 4 ounces juice</td>
<td>¼ - ½ cup raw, 2 Tbsp. – ½ cup canned, 1 – 2 ounces juice</td>
</tr>
<tr>
<td>Adults</td>
<td>1 ½ - 2 cups</td>
<td>1 cup raw, ½ cup canned, 4 ounces juice</td>
<td>¼ - ½ cup raw, ½ cup canned, 2 ounces juice</td>
</tr>
</tbody>
</table>

- Combination foods such as pizza, smoothies, soup, trail mix, cheese and crackers, etc. should be considered as multiple tastings of separate food groups. The tasting size should be ¼ - ½ of a serving for that recipe.

CONSIDERATIONS:
- Food tastings and cooking demonstrations should involve participants in the creation of a recipe that aligns with a nutrition education lesson whenever able.
- Food for tastings may be donated.
- Check to see if you are required to have certification or licensure from the local health department or another local or state agency to conduct food demonstrations at your site.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
- Food for food demonstration and tasting purposes that support a SNAP-Ed nutrition education lesson;
• Pre-approved (as appropriate), reasonable, and necessary non-commercial grade kitchen equipment and dishes for food storage, preparation and demonstration purposes;
• Staff time to prepare, serve and clean up food for demonstration and/or taste testing purposes (school food service staff time is allowable for SNAP-Ed activities ONLY if over and above routine school food service duties); and
• Materials to ensure food safety, as reasonable and necessary.

Unallowable
• Snacks or food service;
• Meal size portions or complete meal service, including “training table meals” (i.e., portion sizes must be limited to taste-test sample sizes, and cannot be snacks, partial meals, or complete meal service);
• Cost of food provided as groceries or supplemental food;
• School food service staff time for any SNAP-Ed activities during regular school/contract hours
• Distributing or providing meals or snacks as incentives (e.g., for attending nutrition education classes, completing evaluations, etc.);
• Incentive payments to encourage attendance at nutrition education classes;
• Use of staff time to prepare or serve full meals or snacks;
• Bottled water, unless necessary for remote food preparation; and
• License or permit fees for farmers markets or food retailers.

GARDENING

REQUIREMENTS:
• All food-based gardening activities are required to have a nutrition education focus that is evidence-based or practice-tested and be approved by MFF.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• Educational supplies, curricula, and staff salaries to teach food gardening concepts as part of a nutrition education curriculum/lesson reinforcing the beneficial nutrition and physical activity aspects of food gardening;
• Garden signage describing the nutrient value of the plant; and
• If pre-approved by MFF in your proposal, seeds, plants, and small gardening tools and supplies needed to reinforce the nutrition messages being taught.

Unallowable
• The rental or purchase of large garden equipment (including rototillers, tractors, etc.);
• The purchase or rental of land for garden plots;
• All costs associated with creating, implementing, and maintaining gardens including mulch and fertilizer, unless pre-approved by MFF; and
• Botany and horticulture discussions, if not tied to a specific, pre-approved nutrition education lesson or curriculum.
INDIRECT COSTS

REQUIREMENTS:
• A federally-negotiated indirect cost rate can be applied to the grant application if substantiated with a certified federal indirect cost rate agreement.
• 10 percent de minimis indirect cost rate can be applied to a grant application if the applicant currently does not have a federal indirect rate and has never received a federally-negotiated indirect cost rate if substantiated with a de minimis certification.

CONSIDERATIONS:
If your agency does not have an indirect cost rate, administrative expenses that are reasonable and necessary to support your SNAP-Ed program may be prorated and submitted for reimbursement pending MFF post-award approval (justification and method of allocation).

MATERIALS, CURRICULUM, and LITERATURE

REQUIREMENTS:
• All literature, materials, curriculum, or audiovisual materials must include the appropriate USDA Nondiscrimination statement.
• You are required to notify MFF of any substantive changes to your programming including changes to lessons and curricula. Changes must be pre-approved at least 30 days prior to implementation. All changes must be submitted prior to April 15th of the program year.
• All materials must be produced for and distributed to SNAP-eligibles and similar persons.
• All materials must focus on nutrition education, physical activity promotion, and/or PSE changes that support increased healthy food/increased physical activity and focus on the consumption of healthy foods within a limited budget.
• Existing SNAP-Ed materials must be used whenever possible, including USDA Food and Nutrition Service materials such Eat Smart, Live Strong; Grow It, Try It, Like It, and other emerging materials.
• Development of new materials, lessons, and curricula is unallowable. If you create new materials, lessons, or curricula, you will not be reimbursed for your time, supplies, or any other associated costs.

CONSIDERATIONS:
Pilot or demonstration materials will be approved on an individual basis based on the strength of your needs assessment and the evaluation plan. A good place to find potential interventions is the SNAP-Ed Toolkit; however, not all of the interventions listed are fully SNAP-Ed allowable or are appropriate for Michigan.

ALLOWABLE & UNALLOWABLE COSTS:
Note: All materials must be pre-approved by MFF in writing, even if they are approved in your proposal and budget, and must be allocated if not used 100% for SNAP-Ed.

Allowable
When identified in your final Project Summary and budget:
• The purchase of USDA FNS nutrition education and physical activity promotion materials addressing SNAP-Ed topics for use with SNAP-eligibles;
• The purchase of other nutrition education materials when there are no FNS or CNPP materials available that address SNAP-Ed topics and it will be used with or distributed to the SNAP-Ed target audience;
• Fact sheets, brochures, newsletters, etc.;
• Videos and websites that are pre-approved by MFF and MDHHS; and
• Materials targeted to intermediaries who deliver allowable services to SNAP eligibles.

Unallowable
• Office supplies;
• Any literature, materials, curriculum, or audiovisual materials:
  o Endorsing or promoting—directly or indirectly—brand name products or retail stores/restaurants (e.g., fast food or supermarket guides including specific restaurant or product names) unless specifically pre-approved;
  o Containing negative written, visual, verbal expressions about specific foods, beverages, products, commodities, products or retail stores, including resources labeling specific foods as “junk food”;
  o Including subject matter outside the scope of SNAP-Ed;
  o Containing personal diet plan information, including weight control/loss or special diet plans;
  o Disparaging a person’s individual attributes, especially body size;
  o Addressing the psychological issues of “body image diseases” (e.g., anorexia or bulimia);
  o Addressing the subject of basic anatomy and physiology (Possible exception: single copies of professional resources to be used by the MFF Partner. This must be pre-approved by MFF.);
  o Addressing screening, treating, or managing diseases;
  o Providing secondary disease prevention intervention information (e.g., cookbooks for people with diabetes or disease/disorder books providing coping tips or suggestions);
  o Premised on using SNAP-Ed funds to pay for manufacturer or store (cents off) coupons;
  o Influencing a store’s pricing policy; and
  o Developed with SNAP-Ed funds that do not include the required Nondiscrimination and Credit Statements.
  o Children’s books that are not on the SNAP-Ed at MFF pre-approved book list: snap-ed.michiganfitness.org/book-lists;
• A bulk purchase of a children’s book on the SNAP-Ed at MFF approved book list without pre-approval; and
• Water bottles, pedometers, and heart rate monitors.

MEDIA ACTIVITIES

REQUIREMENTS:
• Development of mass media (e.g., television, radio, newspapers, billboards, and other outdoor advertising) and earned media (e.g., public service announcements, letters to the editor, opinion editorials, and press conferences) require pre-approval from MFF.
  o Ensure MFF has sufficient lead time to process your request in the event additional approval is required from MDHHS and/or USDA. Include your concept, timeline, and proposed distribution channels with your request.
  o MFF must approve all final copy prior to implementation.
• It is the MFF SNAP-Ed Partner’s responsibility to contact MFF prior to the development and distribution of media materials.
• All media costs and activities must focus on SNAP-eligible people in qualified census tracts or other pre-approved target areas.
• All media activities must:
  o Pre-approved by MFF, even if they were included in your project summary;
  o Provide a justification as to why they are reasonable and necessary;
  o Be coordinated with and complementary to MFF SNAP-Ed campaigns; and
  o Provide the target audience category (and data) that qualifies the activities for SNAP-Ed funding.
  o See “Social Media” section of Program Parameters (page 45) for additional information.

All print and digital media communications (including media/press releases, interviews, articles, blogs, etc.) must include the appropriate Credit Statement (https://snap-ed.michiganfitness.org/nondiscrimination-and-credit-statements).

ALLOWABLE & UNALLOWABLE COSTS:

Allowable

• Media created for SNAP-Ed audiences focused on healthy eating and physical activity, and pre-approved by MFF. Examples of media include but are not limited to:
  o Paid or public service radio and television commercials, interviews, and/or media appearances;
  o Electronic media (e.g., YouTube, Facebook Live, Podcasts, etc.); and
  o The preparation of press releases and press kits, training of spokespersons.

Unallowable

• Any media activities that have not been pre-approved by MFF (includes staff time and effort to support such activities);
• Any media activities that contain messages about SNAP, its benefits, and how to apply;
• Media activities to promote or present nutrition messages to the general public (not targeted to SNAP eligible people);
• Media activities that make potentially derogatory statements about a particular food, beverage, brand, or commodity; and
• Media activities that make potentially derogatory statements about personal attributes, individual SNAP recipients, groups, or communities.

MEDICAL EQUIPMENT and HEALTH SERVICES

ALLOWABLE & UNALLOWABLE COSTS:

Allowable

• Salaries and benefits of personnel to collect dietary intake data based on a 24-hour recall, food frequency questionnaires, or other assessment of nutrition knowledge and behaviors that aligned with activities pre-approved in your proposal; and
• Health promotion activities aimed at primary prevention of disease (prevent or postpone the onset of chronic disease) and designed to help people eligible for SNAP benefits establish and maintain active lifestyles and healthy eating habits focusing on the SNAP-Ed behavioral objectives, as pre-approved in your proposal.

Unallowable
• Medical equipment or health services related to health assessment of recipients;
• Obtaining data on nutritional status, chronic disease, or chronic disease risk assessments, including obesity prevention and/or weight management programs billable to medical insurance;
• Weight scales and/or other anthropometric measurement devices without the pre-approval by MFF (Please note that even if such instruments are in your proposal, approval by MFF must be gained prior to purchase.);
• Any costs (time & effort or equipment) associated with the measurement of height and/or weight unless they are pre-approved by MFF and include an evaluation plan;
• Any costs associated with measurement of skin fold thickness, blood pressure, cholesterol, blood-glucose, and iron levels;
• Clinical health screenings (e.g., cholesterol testing, body mass index, blood glucose testing, etc.);
• Secondary prevention interventions and medical nutrition therapy with the purpose of managing a diagnosed condition (e.g., diabetes, hypertension, etc.);
• Medical nutrition therapy involving the assessment of nutritional status and the assignment of diet, counseling, and/or specialized nutrition therapies to treat an individual’s illness or condition; and
• Dental hygiene activities, including instruction on proper brushing and flossing.

MEMBERSHIPS and SUBSCRIPTIONS
ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• Institutional memberships in business, technical, and professional organizations consistent with your SNAP-Ed objectives and the effort to promote the provision of quality nutrition services to people eligible for SNAP benefits that were approved in your proposal and budget;
• Organizational subscriptions to professional publications that are consistent with your SNAP-Ed objectives and the effort to promote the provision of quality nutrition services to SNAP-eligibles that were approved in your proposal budget; and
• License fee for compliance with local regulations for food safety at community food tastings.

Unallowable
• Any memberships or subscriptions not approved in your proposal and budget;
• Business or individual memberships (e.g., Costco, Sam’s Club, etc.);
• Professional registration or license fees paid by individuals are unallowable because the fees would be considered personal expenses, not institutional expenses;
• Costs of individual memberships in business, technical, and professional organizations for nutrition personnel who work in SNAP-Ed; and
• License or permit fees for farmers markets or food retailers.

NUTRITION ASSISTANCE PROMOTION
ALLOWABLE & UNALLOWABLE COSTS:
Allowable
Promotion of ideas for improving access to and use of healthier foods in low-income communities, excluding activities to increase food security or food access via direct provision of food; and

Within the context of nutrition education interventions, staff may distribute SNAP outreach materials such as brochures and posters to promote SNAP.

Partnerships with local food assistance agencies and organizations to facilitate reciprocal referrals to increase food access and resource benefits, especially those that include fruits and vegetables.

Unallowable

Any activity with the primary objective of increasing participation in SNAP through individual applicant assistance. For SNAP-Ed, information regarding SNAP enrollment should not be placed on any media outreach that may be part of a SNAP-Ed intervention. Basic SNAP information or a link to SNAP information may be placed on handouts, brochures, recipes, etc. only.

Examples of unallowable outreach activities include:
- Pre-screening or assisting individuals with completing SNAP applications and obtaining verification;
- Accompanying individuals to the SNAP office to assist with the application process;
- Conducting outreach workshops for members of community organizations that serve low-income people;
- Convening meetings that focus exclusively or primarily on SNAP outreach and increasing SNAP participation;
- Producing and distributing print materials (e.g., brochures, posters, newsletters, etc.) that are primarily SNAP outreach in nature;
- Developing and placing print, radio or television media advertisements to be used as public service announcements to educate potential applicants about SNAP;
- Designing a SNAP outreach program, including the development, publication, and distribution of materials to the community;
- Accessing strategies or monitoring and/or evaluating agencies’ SNAP outreach performance;
- Developing, implementing, or overseeing SNAP outreach activities; and
- Implementing “Direct Certification” of SNAP households for other programs.

NUTRITION EDUCATION EVENTS, CLASSES, and COMMUNITY EVENTS

REQUIREMENTS:
- All nutrition education events, classes, and community events supported by SNAP-Ed are required to focus on the SNAP-Ed behavioral objectives outlined in your proposal.
- Any activities that are not 100 percent focused on SNAP-Ed behavior objectives must be prorated or funded through another source.
- To qualify as direct nutrition education, education must be at least 20 minutes in length and associated reach must be collected or estimated.
- Nutrition education activities and events must be targeted to the audiences and delivered at the locations detailed in your approved scope of work.
  - When operating in conjunction with existing programs, activities are required to enhance and/or supplement, not supplant them. For example, the cost for a
classroom teacher paid outside his/her contract time to conduct an extracurricular cooking club for low-income teenagers could be allowable. However, using SNAP-Ed funds to replace personnel costs of state-funded school class time would be considered outside the scope of SNAP-Ed funding.

ALLOWABLE & UNALLOWABLE COSTS:

Allowable

- Structured, interactive nutrition education and physical activity promotion in the community, cafeteria, and classroom, and PSE efforts that support your direct education programming;
- If nutrition education is included with classes and events having other topics, only the portion of class/event pertaining to SNAP-Ed allowable content (This includes materials and staff time and effort); and
- The allocated share of costs of classes that are provided to targeted groups in conjunction with another program (e.g., Head Start), provided the local agency provides the interagency agreement that exists between the programs and the method for allocating costs between the programs.

Unallowable

- Any nutrition education that duplicates efforts of similar SNAP-Ed programming and/or USDA-funded nutrition education;
- Classes that are designed to provide case management, general decision-making skills, or "life skills" training (e.g., parenting, child development, crisis management, rental information);
- Medical nutrition therapy and secondary prevention interventions;
- Breastfeeding education, promotion, support, materials and activities that duplicate those provided by other funding sources such as WIC, EFNEP, or Head Start;
- Ongoing physical activity programs that are not integrated with SNAP-Ed allowable nutrition education;
- Exercise classes, equipment, and facilities;
- Weight loss classes, individualized meal plans, obesity treatment programs, etc.;
- Nutrition education costs that are charged to another Federal program (e.g., Team Nutrition, WIC, EFNEP, Head Start, etc.);
- Childcare services provided for SNAP-Ed recipients in conjunction with SNAP-Ed;
- Transportation services provided for SNAP-Ed recipients in conjunction with SNAP-Ed;
- Payment, incentives, or prizes for recipients to attend nutrition education activities;
- Education for incarcerated or institutionalized persons not eligible for the SNAP (e.g., people in jails, prisons, nursing homes, mental institutions, etc.);
- School assemblies of a celebratory nature that do not target parents with nutrition education/messaging and do not meet the minimum parent attendance rate of 20 percent of student enrollment; and
- Community-based Events and Parent Engagement Activities not pre-approved by MFF.

NUTRITION EDUCATION REINFORCEMENT ITEMS (NERI)

REQUIREMENTS:

- Nutrition Education Reinforcement Items (NERI) are supplied in limited quantities to subrecipients statewide by MFF.
• When used, NERI must be given to all participants and cannot be used as rewards or incentives for only some participants.
• NERI must reinforce your objectives to support the sustainability of the desired behavior change. NERI must also be aligned with specific lessons within an intervention.
  o There should be an intentional, direct connection between the NERI and the education message(s) being promoted. This should be outlined in your NERI order form and Community-based Events and Parent Engagement Activities pre-approval form.
• NERI designed for physical activity promotion (e.g., Flip 'n Fling) must be provided in conjunction with a relevant nutrition and physical activity promotion lesson.
• In the rare case when the purchase of NERI by an organization is justified, it MUST be pre-approved by MFF in writing, even if it was written into your proposal and/or budget.
  o NERI must cost $5 or less per item (including message imprinting and excluding shipping and handling).
  o If the NERI is a physical activity promotion item (e.g., jump rope, resistance band, etc.) there must be a nutrition education and not physical activity (PA) message on it (e.g., the NERI message “Get active every day” is not appropriate for use on PA promotion items).
  o The nutrition education message must be pre-approved by MFF.
  o The SNAP-Ed Credit Statement must be on the item, as size allows.

ALLOWABLE & UNALLOWABLE COSTS:

Allowable
1. NERI provided by MFF.

Unallowable
• Any NERI purchased that has not been pre-approved in writing by MFF staff, even if it was written into your proposal and/or budget.

PHYSICAL ACTIVITY PROMOTION

REQUIREMENTS:
• Educational and program materials to promote and reinforce physical activity (PA) for all target audiences should include messages that link nutrition and physical activity and explain the associated health benefits of active lifestyles.
• All physical activity programming must be within the context of direct nutrition education. Activities may include PA demonstrations for the SNAP-Ed audience and training for staff to develop skills to help SNAP-Ed participants.
• PA demonstrations must be instructional in nature and conducted on a one-time-only basis (per demonstration per group of people) for SNAP-eligibles.
• Education and program materials developed to promote and reinforce PA should include messages that link nutrition and physical activity and the associated health benefits of active lifestyles and caloric balance.
• PA promotion must use existing materials whenever they are available.
• MFF must pre-approve any new materials that are developed for PA promotion.
• If PA promotion includes regularly scheduled demonstrations of a particular physical activity (e.g., monthly yoga demonstration), assurance must be provided that only unduplicated participants attend. The same individual cannot attend each monthly yoga demonstration because this would be considered ongoing PA, which is unallowable under SNAP-Ed guidelines.
• Any supplies or materials purchased must be of nominal value and meet the reasonable and necessary guidelines.
• Any items that are given to participants to take home must be pre-approved by MFF and meet all NERI guidelines.

ALLOWABLE & UNALLOWABLE COSTS:

Allowable

• Physical activity (PA) promotion as a component of broader nutrition activities that provide SNAP-Ed target audiences with information about and encouragement of physical activity;
• PA messages and PA recommendations contained in the most current Dietary Guidelines for Americans;
• Providing information about low-cost and no-cost physical activities;
• Providing community resource information (e.g., a free local fitness event) in order to encourage program participants to engage in regular PA;
• When pre-approved by MFF and provided concurrently with nutrition interventions, personnel costs for conducting a physical activity demonstration designed to introduce SNAP-Ed participants to an activity and how/where to participate in the future;
• Walk to School Day and other events that are part of a larger nutrition education campaign that encourage the SNAP-Ed target audience to engage in regular physical activities;
• Information about locations where SNAP-eligibles and other low-income people can access low or no-cost activities appropriate for different ages and physical abilities;
• Physical activity bulletin boards or displays around the nutrition assistance offices, clinics, or other community locations where SNAP-eligibles congregate;
• Referrals to library or website resources on physical activity;
• Development and provision of PA information and resource lists as well as collaborative efforts with community partners to promote PA;
• Pre-approved educational materials (e.g., brochures, newsletters, posters, public service announcements, audiotapes, videotapes, and DVDs) to promote PA that are purchased from reliable authorities;
• PSE interventions that promote and support physical activity are allowable;
• Helping partner groups organize and plan walking trails may be an allowable SNAP-Ed expense; and
• Promoting a walking trail and the benefits of physical activity to address weight management are SNAP-Ed allowable costs and are in accord with SNAP-Ed’s goal and focus.

Unallowable

• Ongoing exercise or PA classes with duplicated audiences (e.g., yoga classes, fitness classes, walking clubs, sports teams, running classes, gym classes);
• PA community assessments unless directly related to SNAP-Ed programming SMART objectives;
• Implementation of environmental improvements (structural) to increase walkability;
• Health club or gym memberships, dues, equipment (e.g., bicycles, treadmills, stair steps, weights, etc.), and facilities;
• Personnel costs for conducting or maintaining ongoing exercise or PA classes;
• PA promotional materials developed without MFF’s pre-approval;
- Water, sport drinks, or other beverages given to participants during PA promotion demonstrations;
- Water bottles; and
- Pedometers and heart rate monitors, unless pre-approved and accompanied by an evaluated program intervention.

**POLICY, SYSTEMS, and ENVIRONMENTAL CHANGE**

**REQUIREMENTS:**
- MFF Partners participating in policy, systems, and environmental change activities:
  - Shall not exclusively lead the effort; rather, collaborations are necessary;
  - Should work to increase community partnerships to include those who can facilitate change in the environment, such as working with retail grocers to increase the availability of fruits and vegetables in grocery stores;
  - Should help facilitate reciprocal referrals with other food assistance programs to increase food resource benefits, especially those that include fruits and vegetables;
  - Shall include indicators of change and outcome measures in their overall evaluation strategy;
  - Should work with other partners to refer to appropriate programs and organizations that will assist in the accomplishment of its objectives;
  - Must consider the cultural needs of the populations served and consider existing partnerships to develop solutions to bring healthy foods and opportunities for physical activity to the community; and
  - Must be aware of systems and environmental barriers, such as a lack of transportation, policies that restrict the formation of farmers markets, or limitations on physical activity due to unsafe environments.
- PSE activities, including time and effort, must align with your other SNAP-Ed responsibilities.
- All PSE activities must be reasonable and necessary.

**ALLOWABLE & UNALLOWABLE COSTS:**

**Allowable**
- Costs associated with providing consultation and technical assistance to organizations in creating appropriate PSE changes that benefit low-income households and communities. (The organization that receives the consultation and technical assistance is ultimately responsible for adopting, maintaining, and enforcing the PSE change.);
  - While most costs associated with PSE changes are staff time and effort, some costs associated with the implementation of PSE change efforts within the scope of SNAP-Ed may be allowable (e.g., promotion of a new PSE change, safety and education efforts related to a new PSE change, or signage). Written pre-approval from MFF is required prior to purchase.
- Costs associated with the implementation of PSE efforts within the scope of SNAP-Ed (e.g., signage) (require written preapproval from MFF prior to purchase);
- Consultation with partner organizations on promoting organizational policy and practice changes that support healthy food and beverages, physical activity, and reduced sedentary behavior (e.g., entertainment screen time);
- Analyzing and preparing data reports and sharing information on the expected benefits of PSE changes;
Consultation with food retailers, farmers, food distributors, and farmers market managers on increasing access to and promotion of whole grains, fruits and vegetables, and low-fat dairy;
Conducting environmental scans or assessments of the food and activity environments where food and activity decisions and choices are made;
Community forums or meetings with SNAP-Ed recipients or service providers on healthy eating and active living;
Point-of-purchase or point-of-decision signage and other behavioral cues to action that promote healthy eating or physical activity choices;
Resource kits with strategies for adopting, implementing, maintaining, and evaluating policy, systems, and environmental changes; and
Consultation with partner organizations on measures to address and reduce food waste and maximize utilization and consumption of available healthy food resources.

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

PROFITS, REVENUES, FUND RAISING, and GRANT WRITING

REQUIREMENTS:
Any sales of SNAP-Ed publications, materials, etc. received by an MFF Partner or contractor must be accounted for in a separate, identifiable account, used to offset current SNAP-Ed program expenditures, and comply with USDA and OMB Uniform Guidance.
SNAP-Ed programming must be offered free of charge.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
Sale of publications and nutrition education materials produced with SNAP-Ed funds that are sold at cost (publication cost includes concept development, production, and distribution expense).

Unallowable
Sale of publication/materials produced with USDA dollars to make a profit (the generation of program revenue over the cost of goods); Grant writing; and
Fund raising events or activities, including financial campaigns and solicitation of gifts and bequests to raise capital or obtain contributions, regardless of the purpose for which the funds will be used, including SNAP-Ed programming.
RETAIL LOCATIONS

REQUIREMENTS:
- SNAP-Ed services that take place in partnership with retailers may only do so at retail sites (grocers, markets, restaurants) that are both authorized to accept nutrition assistance and located in geographic areas meeting at least one of the SNAP-Ed targeting criteria below:
  - Retail sites with documented redemption of SNAP benefits averaging $50,000 or more per month; or
  - Retail sites located in census tracts where at least 50 percent of persons have gross incomes that are equal to or less than 185 percent of the Federal poverty threshold.
  - Talk with your MFF project manager about other potential sites that do not fit or meet the above requirements.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
- Comprehensive merchandising and promotional activities in supermarkets, small chain stores, and independent (neighborhood) markets in qualifying areas designed to increase the purchase of fruits and vegetables among SNAP eligible; and
- Cooking/food demonstrations, food tastings, store tours, and retail-sponsored community events conducted to support nutrition education lessons at qualifying sites.

Unallowable
- Partnerships with establishments that do not accept nutrition assistance or meet the target criteria of 50 percent or more of the audience is at or below 185 percent of the Federal poverty threshold; and
- Retail site activities not focused on SNAP-Ed target audiences.

SOCIAL MARKETING CAMPAIGNS (ALSO SEE MEDIA)

REQUIREMENTS:
- MFF is developing and implementing statewide social marketing campaigns on behalf of all MFF Partners. It is very unlikely that any local, independent social marketing campaign will be approved.
  - If pre-approved in writing by MFF, any MFF Partner social marketing campaign must be aligned with the statewide campaign and included in your project proposal.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
- N/A

Unallowable
- Social marketing activities and campaigns not pre-approved by MFF and not included in your project proposal.
SOCIAL MEDIA
This information applies to Facebook, Pinterest, Instagram, and other social media distribution channels.

REQUIREMENTS:
- Proposed social media activities (participant recruitment and/or program promotion) must be provided to MFF prior to implementation. Include details about the following items: purpose, channel(s), frequency, and how you will collect, store, and archive comments (as applicable).
- Staff time and effort to promote SNAP-Ed programming (e.g., classes, events, storytelling, etc.) using social media must be outlined under SNAP-Ed duties in the SNAP-Ed Budget.
- All social media content and information must be promotional and:
  - Relevant to and support your SNAP-Ed programming;
  - Align with MFF SNAP-Ed messaging;
  - Not promote or disparage specific products or food;
  - Not share pages or websites that promote or disparage specific products or food;
  - Not controversial or divisive; and
  - Does not promote any ‘like’ and ‘share’ contest.
- Social media activities (channel(s) and frequency) must be included in your monthly program highlight report.
- Be able to track and report against analytics (e.g., reach, open rate, time on page, likes, etc.)
- Contact your MFF Project Manager to request pre-approval for social media activities other than participant recruitment or program promotion. If approved, these activities must be included in your project summary.

Note: While you may not see every inappropriate comment right away, you must attend to all social media platforms used and address inappropriate comments as soon as possible. Additional guidance and resources are forthcoming.

Allowable
- Credible content that promotes local SNAP-Ed DE and/or PSE change programs, interventions, events, and/or strategies;
- Credible content that engages SNAP-Ed eligible people to eat healthy and move more; and
- Customized messages that are locally- and culturally-relevant, reach target audiences, and align with your SNAP-Ed program design.

Unallowable
- Social media activities other than for participant recruitment or program promotion that have not been pre-approved by MFF;
- Content that makes potentially derogatory statements about a particular food, beverage, brand, or commodity;
- Content that makes potentially derogatory statements about personal attributes or individual SNAP recipients, group, or communities; and
- Content, comments and/or images that contain:
  - Hate speech;
  - Profanity, obscenity, or vulgarity;
  - Nudity in profile pictures;
- Defamation to a person or people;
- Name calling and/or personal attacks;
- Comments whose main purpose are to sell a product;
- Comments that infringe on copyrights;
- Spam comments, such as the same comment posted repeatedly on a profile; and
- Other comments that the MFF Social Media team deems inappropriate.

**SPACE ALLOCATION**

**REQUIREMENTS:**
- Space must be allocated when staff members are not 100 percent dedicated to SNAP-Ed.
- Space allocations must be pre-approved by MFF.
- Do not request reimbursement for space if it is included in your agency’s approved indirect rate.

**ALLOWABLE & UNALLOWABLE COSTS:**

**Allowable**
- Space allocated for SNAP-Ed programs in which the plan for the space/cost allocation is documented and actual out-of-pocket costs are incurred and tracked.

**Unallowable**
- Space costs that are fully funded by another program; and
- Commercial rental rates in government-owned space.

**TIME and EFFORT REPORTING and EMPLOYMENT COSTS**

**REQUIREMENTS:**
- Time and effort reporting requirements emanate from 2 CFR 200 OMB Uniform Guidance (UG). Time and effort reporting applies to all staff and volunteers contributing effort to this SNAP-Ed grant.
- Key principles for ensuring time and effort practices align with 2 CFR 200 OMB UG guidelines:
  1. Supported by a system of internal controls: accurate, allowable and allocable charges;
  2. Incorporated into agency’s official records;
  3. Reflect total activity for which employee is compensated;
  4. Encompass Federally-assisted and all other activity for which employee is compensated;
  5. Comply with established accounting practices;
  6. Support distribution of salary and wages across all activities and cost objective;
  7. Budget estimates do not qualify as charges but may be used for interim accounting purposes;
  8. Practices for constituting a full workload vary for Institutes for Higher Education (IHE), records may reflect categories of activity expressed as a percentage distribution of total; and
  9. When recoding salary and wages for IHE to Federal awards, a precise assessment is not always feasible nor is it expected (see UG for more detail).
• In order to meet the standards above, personnel activity reports may be required, including prescribed certifications or equivalent documentation to support the required records.
• Charges for salaries and wages of nonexempt employees must be supported by records indicating the total number of hours worked each day.
• Weekly time and effort reporting is required by all staff (including salaried staff) devoting less than 100% of their time to SNAP-Ed.
• Employees devoting 100% of their time to SNAP-Ed do not need to maintain weekly time sheets; however, semi-annual time and effort certification by the employee and a supervisor is required.
• All time and effort reporting must be signed by the employee and certified by a supervisor or primary investigator who is knowledgeable of the employee’s duties and their work with SNAP-Ed. Although time devoted to SNAP-Ed must be recorded and signed by the employee on a weekly basis for staff devoting less than 100% time, certification of the time sheets may occur on a bi-weekly basis.
• All time documentation forms must reflect after-the-fact reporting and may not be completed in advance of the activity and later certified by the employee.
• All activity reflected on time and effort reports for SNAP-Ed must be allowable within the MFF SNAP-Ed guidelines.
• All time and effort reports should be kept and archived locally. Partners may be required to periodically submit their time and effort reports to MFF for compliance review.
• All expenses associated with employee recruitment and new employee tests should be done at the expense of the Partner and not charged to the SNAP-Ed Grant.

Volunteers:
Time and effort documents should be kept for volunteers who contribute time to SNAP-Ed using the same principles as noted above, when applicable. More details about volunteers can be found in the “Volunteers” section at the end of these Program Parameters.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• Staff time spent planning, delivering, and evaluating nutrition education and physical activity promotion time must be charged at a rate commensurate with duties being performed;
• Food service staff time is only allowable with a memo from the school confirming the work being done is above and beyond the staff member’s normal time and pay and directly supports approved SNAP-Ed programming;
• Reimbursement of teacher time and effort is only allowable with a memo from the school confirming the work being done is above and beyond the teacher’s normal time and pay;
• Contractual staff when a list of deliverables, period of service, and hourly rate is established (MFF encourages you to have a formal agreement in place for all contractual employees, including cost, terms, SNAP-Ed deliverables, and appropriate signatures from both parties.); and
• Administrative salary will be evaluated in the context of full proposal and scope of programming.

Unallowable
• Stipends;
• Incentives;
• A physician’s or other specialized provider’s time spent conducting SNAP-Ed activities when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing;
• Overtime hours unless pre-approved in writing by MFF;
• Using SNAP-Ed funds to replace personnel costs of state-funded school class time would be considered outside the scope of SNAP-Ed funding;
• Staff time and effort to conduct or support unallowable SNAP-Ed activities; and
• New employee hiring expense including testing, background checks, finger printing, drug testing, etc.

TRAINING, CONFERENCES, and WORKSHOPS

REQUIREMENTS:
• Staff attendance at trainings, conferences, workshops, meetings, and summits must be aligned with the approved SNAP-Ed program objectives and included in your proposal and budget.
• Prior written authorization is required from MFF for any training and travel not listed in your approved budget.
• Funds spent on training, conferences, workshops, meetings, and summits are required to target SNAP-eligibles or intermediaries working with SNAP-eligibles.
• When submitting for reimbursement for expenses after conducting a training or meeting, the following must be submitted:
  o Itemized receipts for all expenses being reimbursed;
  o The agenda documenting the start and end time; and
  o A sign-in sheet documenting the participants at the meeting/training.
    ▪ If the number of participants who registered for the meeting/training is lower than the number of actual participants (causing the per person meal rate to be more than allowed), please also provide registration logs.

CONSIDERATIONS:
• Consult the “Travel” section for issues relating to travel as well as below in “Allowable.”
  o Travel and meal rates may change during the program year. It is your responsibility to use the correct travel rates. The most up-to-date travel and meal rates can be found at snap-ed.michiganfitness.org/forms-and-reports.
• Actual travel costs are eligible for reimbursement, not exceeding the posted SNAP-Ed allowable rates.
• Proration for attendance at training, conferences, and workshops will be considered and must be pre-approved.
• Travel and meal rates are subject to change during the program year.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• Training related to SNAP-Ed objectives (including travel expenses within SNAP-Ed allowable rates) for staff that provide nutrition education to SNAP-eligibles if training is reasonable and necessary for program implementation and approved in your proposal and budget;
• When conducting a training or meeting, lunch costs may be reimbursed if the following criteria is met:
  o Meal costs do not exceed the allowable meal rates;
  o If the training has at least six hours of SNAP-Ed content; and
If the training has at least five hours of SNAP-Ed content AND at least 50 percent of the participants have traveled at least 30 minutes one way to attend.

- If meals are allowable, meal costs cannot exceed the allowable meal rates. For the current rates, please consult the SNAP-Ed Travel & Meal Rates found at snap-ed.michiganfitness.org/forms-and-reports. (State travel and meal rates are usually updated around January 1st);
- Participation in regional or state coalitions on SNAP-Ed-specific business;
- SNAP-Ed-related training for program delivery staff (e.g., Choices, intervention-specific training, SNAP-Ed U, or regional MFF meetings and trainings);
- SNAP-Ed support or partial payment of meetings, conferences, and summits. Costs must be prorated based on:
  - The proportion of the target audience that are SNAP eligible; and
  - The proportion of the agenda that is SNAP-Ed nutrition education or PA promotion for low-income audiences.
- Nutrition education training materials; and
- General briefings and trainings for community health professionals, if such professionals serve a majority of SNAP-eligibles and training focuses on SNAP-Ed objectives approved in your proposal and budget.

**Unallowable**

- University-level courses on technical or clinical subjects that are not relevant to the practical delivery of nutrition education to SNAP-eligibles;
- Costs associated with certifications (e.g., CPR), CEUs, etc. for an individual’s personal credentialing;
- Training materials that have not been reviewed and pre-approved by MFF;
- Training or professional development costs for food service workers or others not directly associated with delivery of SNAP-Ed; and
- Staff time or other expenditures related to multi-state or national-level work or committees, except where the activity is an integral part of the FNS SNAP-Ed focus and pre-approved by MFF.

**TRAVEL**

**REQUIREMENTS:**

- Actual travel costs up to the maximum SNAP-Ed rates will be reimbursed.
- Receipts for all travel expenses are required including itemized receipts for meals, tolls, lodging, etc.
- Meals are reimbursed during overnight travel only.
  - If overnight lodging is not being reimbursed by SNAP-Ed, you must provide proof of an overnight stay in order to have meals reimbursed.
- SNAP-Ed travel rates and guidelines apply to individuals supported by SNAP-Ed funds, including employees, subcontractors, consultants, advisory committee members, etc.

**CONSIDERATIONS:**

- All MFF SNAP-Ed travel rates follow the State of Michigan travel rates.
- Travel rates may change during the program year. It is your responsibility to use the correct travel rates. The most up-to-date travel and meal rates can be found at: snap-ed.michiganfitness.org/forms-and-reports.
ALLOWABLE & UNALLOWABLE COSTS:

Allowable
- Travel costs associated with MFF SNAP-Ed business including MFF SNAP-Ed-sponsored training or events. (These expenses may be 100 percent reimbursed even if the person is not 100 percent FTE on SNAP-Ed);
- When pre-approved travel costs provide benefit to multiple programs, the travel costs must be prorated based on the benefit to SNAP-Ed;
- The current mileage is $0.5750 per mile for SNAP-Ed travel. This rate is subject to change during the program year. Please consult the SNAP-Ed Travel & Meal Rates;
- Meals are allowable when in overnight status on SNAP-Ed business. (Rates may vary depending on location. Please consult the SNAP-Ed Travel & Meal Rates);
- The current lodging rate is a maximum of $85 per night plus taxes. The lodging rate is subject to change during the program year. Please consult the SNAP-Ed Travel & Meal Rates;
- Lodging at a pre-approved conference location that has a negotiated rate over the $85/night SNAP-Ed rate is allowable. (Documentation from the conference identifying the approved conference rate must accompany the invoice.); and
- Internet access is allowable during an overnight stay when reasonable and necessary.

Unallowable
- Travel outside of Michigan;
- Travel for workshops and conferences not included in your budget and/or pre-approved by MFF; and
- Any travel expenses above the approved SNAP-Ed rates.

VOLUNTEERS

REQUIREMENTS:
- Volunteers may not receive goods, services, credits, or any amount of cash for their service.
- Volunteers must be 18 years of age.
- Time and effort documents should be kept for volunteers who contribute time to SNAP-Ed using the same principles as noted in the “Time and Effort Reporting and Employment Costs” section, when applicable.

ALLOWABLE & UNALLOWABLE COSTS:

Allowable
- Unpaid volunteers who are giving of their time as a private citizen that are providing service to your organization for allowable SNAP-Ed activities, e.g.:
  o A volunteer contributes time to produce a weekly nutrition newsletter to distribute to SNAP eligible residents;
  o A retired dietitian volunteers to teach nutrition education classes to SNAP eligible; or
  o A college student volunteers to do food tasting demos for SNAP-eligibles and his/her hours are not part of a class requirement.
- Staff employed by a nonprofit or non-Federal public agency may volunteer if it is above and beyond their paid time.

Unallowable
- Volunteer time that is not used toward SNAP-Ed behavior objectives;
• Volunteer time used for a dual purpose (e.g., a student contributes time to support SNAP-Ed in order to meet a requirement for a student project or a Master Gardener contributes time to support SNAP-Ed and counts it toward their Master Gardener commitment);
• Private organization or business whose staff members are volunteering as part of an “on the clock” corporate volunteer effort; and
• “Volunteers” whose time is paid for by another Federal funding source.

WEBSITES, WEB PAGES, and DOMAIN NAMES
This information applies to websites, pages embedded on websites, and domain names.

REQUIREMENTS:
• All content and information must:
  o Be relevant to and support your SMART objectives;
  o Align with MFF SNAP-Ed messaging;
  o Be pre-approved by MFF before going “live”;
    ▪ Approval by MDHHS may also be required.
  o Not promote or disparage specific products or food; and
  o Not link to other sites that promote or disparage specific products or food.
• Appropriate nondiscrimination statements must be displayed on websites and web pages.
• A process to regularly update the website must be outlined in a memo and on file with MFF. This memo should include:
  o Who will update the website/page;
  o How frequently it will be updated;
  o The time commitment to manage the website; and
  o A statement acknowledging that significant content changes require MFF review.
• Evaluation of the usage and impact of website/page must be conducted:
  o Is the website/page doing what you want it to?
  o How many people are using the site?
  o What is the audience using it for?
• Signed photo releases or documentation of legal use, permissions, or purchase of all photos used on the website must be on file.

CONSIDERATIONS:
• Purchasing host sites and domain names:
  o Host sites and domain names purchased or developed with SNAP-Ed funds carry a nonexclusive waiver-free right for public use.
  o If your program will use the domain name beyond the full scope of your SNAP-Ed work, you should purchase the domain with non-SNAP-Ed funds.
• Websites should link to established, allowable, and evidence-based websites to convey nutrition information whenever possible. Considering the many established, accredited resources in existence, time spent creating similar information may not be reimbursable.

ALLOWABLE & UNALLOWABLE COSTS:
Allowable
• Purchase of host sites and domain names if approved in your proposal and budget (see the first bullet in Considerations above);
• Staff time or contractor to develop, maintain, and evaluate a website focused on the SNAP-Ed objectives approved in your proposal and budget; and
• Purchase of reasonable and necessary tools and resources to support the development of your website (e.g., photos).

Unallowable
• Websites, web pages, or links that promote or disparage products, food, or organizations.