



# SUBRECIPIENTS

## SNAP-ED AT MICHIGAN FITNESS FOUNDATION FY 2024 PROGRAMMING & OPERATIONS MANUAL

# Table of Contents

	Page
Welcome to the Fiscal Year 2024 SNAP-Ed Program Year.....	1
SNAP-Ed Overview.....	2
• SNAP-Ed Goals and Guiding Principles .....	2
• SNAP-Ed Approaches .....	3
• Using Evidence-Based Interventions .....	5
• Social Marketing and PSE Change.....	6
• SNAP-Ed Evaluation.....	8
• RE-AIM Model.....	9
• SNAP-Ed Domains .....	10
• SNAP-Ed Target Audiences.....	11
SNAP-Ed in Michigan.....	13
• Michigan SNAP-Ed Vision and Organizational Chart.....	13
• Michigan SNAP-Ed Goals.....	14
• SNAP-Ed at the Michigan Fitness Foundation .....	14
• SNAP-Ed Program Funding.....	15
Grant Management.....	17
• SNAP-Ed at MFF Tools .....	20
• Required Reporting.....	21
• Reimbursement.....	24
• Program Budget and Contract Amendments .....	25
• Record Retention .....	26
• Subrecipient Monitoring .....	26
• Reporting Due Dates .....	27
SNAP-Ed Assurances .....	29
• Letter of Intent.....	30
• Compliance Assurances .....	32
• Program Assurances .....	35
• Evaluation Assurances .....	37
SNAP-Ed at MFF Evaluation Requirements .....	41
Program Parameters.....	46
• Table of Contents.....	46
• Program Parameters Overview.....	47
• Key Requirements .....	50
• SNAP-Ed Program Parameters (Alphabetically by Category: <i>Community Events</i> through <i>Websites and Domain Names</i> ).....	54
Additional Information .....	76
• Table of Contents.....	76
• Abbreviations/Acronyms .....	77
• Nondiscrimination Statement .....	78
• Travel and Meal Rates.....	80
• Recipe Selection and Tasting Size Guidelines .....	82
• Definitions .....	85

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*It is important that you thoroughly review all material.  
Call-out boxes, like this text box, are included  
throughout the manual to draw your attention to  
important information.*

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**TO:** Subrecipient grantees delivering SNAP-Ed programming locally in Fiscal Year (FY) 2024

**FROM:** The SNAP-Ed Team at the Michigan Fitness Foundation

**RE:** Welcome to the FY 2024 Program Year

**DATE:** October 1, 2023

The SNAP-Ed Team at Michigan Fitness Foundation (MFF) welcomes you, your team, and the communities you serve to a new program year.

We look forward to being a thought partner as you work with SNAP-Ed eligible people in Michigan to increase healthy behaviors and access to affordable healthy food and safe places for physical activity. SNAP-Ed has an important role in addressing the social determinants of health that cause health disparities by conducting authentic community engagement, delivering locally-relevant programming that centers community needs and assets, and leveraging strategic and collaborative partnerships.

Your organization has demonstrated the ability to independently design, deliver, and monitor a SNAP-Ed program. As a subrecipient grantee, you are responsible for following Federal and SNAP-Ed regulations and making programmatic and grant management decisions.

The *FY 2024 Programming & Operations Manual for Subrecipients* (P&O Manual) outlines what you need to know about SNAP-Ed program implementation in Michigan. This key, go-to-resource bridges the USDA Food and Nutrition Service's (FNS) *FY 2024 SNAP-Ed Guidance* with state and FNS region-specific SNAP-Ed regulations. It details general SNAP-Ed guidance, programming and grant management requirements, and expectations for key program activities like evaluation.

Be sure to thoroughly review the P&O Manual prior to program implementation and use it throughout the program year to ensure that your SNAP-Ed program activities align with SNAP-Ed guidelines.

The P&O Manual is a comprehensive tool for your program but only one of the many tools available to you. Throughout the year, we will share additional tools and resources to support you, as they become available. Remember, your MFF Program Manager and Evaluation Specialist can also help you with questions. Feel free to connect with them at any time.

Thank you for your work to improve the lives of people who are SNAP-eligible in Michigan. MFF is committed to working alongside you to cultivate a healthier Michigan.

Best Regards,

The SNAP-Ed Team at the Michigan Fitness Foundation

# SNAP-Ed Overview

The United States Department of Agriculture's (USDA) **Food and Nutrition Service (FNS)** mission is to work with partners to provide food and nutrition education to people in need in a way that inspires public confidence and supports American agriculture. USDA's **Supplemental Nutrition Assistance Program (SNAP)** provides nutrition assistance benefits to eligible low-income households so they can purchase food from authorized food retailers.

Through nutrition education, physical activity promotion, and community change work, **Supplemental Nutrition Assistance Program Education (SNAP-Ed)** strengthens SNAP's public health impact by addressing food and nutrition security to improve nutrition and prevent or reduce diet-related chronic diseases, including obesity, among SNAP recipients. **SNAP-Ed is overseen by the Nutrition Education Branch within FNS and supported through Regional Offices.**

In Michigan, all SNAP programming is administered by the Michigan Department of Health and Human Services (MDHHS). MDHHS has established two SNAP-Ed State Implementing Agencies, the Michigan Fitness Foundation (MFF) and Michigan State University Extension (MSU Extension). Michigan SNAP-Ed recognizes the four pillars: 1) Meaningful Support, 2) Healthy Food, 3) Collaborative Action, and 4) Equitable Systems as guidance to intentionally implement and evaluate SNAP-Ed activities to improve food and nutrition security status among people who are SNAP-eligible in Michigan.

**SNAP-Ed emphasizes the importance of programming that adopts approaches to deliver evidence-based nutrition education and obesity prevention activities with an equity lens. To the extent possible, these approaches: address the co-existence of food insecurity and diet-related chronic diseases; prioritize comprehensive multi-level and/or public health approaches with the potential to reach historically underserved populations; and translate the latest science into culturally and contextually relevant actions that communities can integrate into their daily lives.**

**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 eligible individuals" 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. It also includes individuals residing in communities with a significant low-income population.

## **The 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 more physical activity.

SNAP-Ed maximizes its impact by concentrating on key behavioral, community, and population outcomes achieved through evidence-based direct education, multi-level interventions, social marketing, policy, systems and environmental (PSE) change 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 ( $\geq 50\%$ ). (See SNAP-Ed Target Audiences for additional information about qualifying target audiences.)

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 intervention strategies and policy level interventions must be consistent with the [Dietary Guidelines for Americans](#) (DGA) and may include activities that encourage healthier choices and/or focus on increasing or limiting consumption of certain foods, beverages, or nutrients.
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. SNAP-Ed's reach 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.

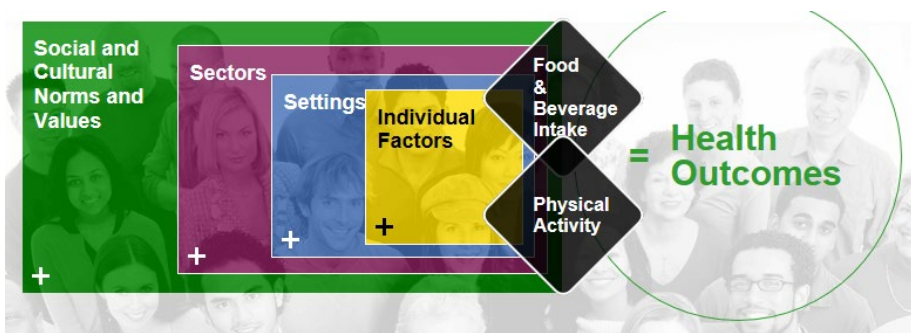
SNAP-Ed programs must consider the unique needs of people eligible for SNAP, specifically the need to make healthy choices on a limited food budget and to increase physical activity to achieve or maintain caloric balance. The [Dietary Guidelines for Americans](#) are the foundation of nutrition education and obesity prevention efforts in all USDA FNS nutrition assistance programs, and messages delivered through SNAP-Ed must be consistent with the most current version. Refer to the USDA Center for Nutrition Policy and Promotion ([cnpp.usda.gov](http://cnpp.usda.gov)) for complete information on the DGA.

USDA FNS expects SNAP-Ed programs to coordinate SNAP-Ed activities with other nutrition education, obesity prevention, and health promotion initiatives and interventions, especially those implemented by other USDA FNS nutrition assistance programs.

### SNAP-Ed Approaches

USDA FNS requires comprehensive interventions that address multiple levels of the Social-Ecological Model (SEM) 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.

Refer to the [Dietary Guidelines for Americans](#) for details about the *Social-Ecological Framework for Nutrition and Physical Activity Decisions*.



To deliver a comprehensive SNAP-Ed program, SNAP-Ed funds must be used for evidence-based activities using the SNAP-Ed approaches. SNAP-Ed approaches must include Approach One and Approach Two and/or Approach Three. **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.

Some examples of Approach One include, but are not limited to:

- Conducting nutrition education based on the DGA 2020-2025.
- Integrating nutrition education into physical activity promotion or interventions based on the Department of Health and Human Services (HHS) Physical Activity Guidelines.
- Implementing classes to build basic skills, such as cooking, menu planning, or food resource management.
- Delivering curricula and interventions virtually.

### AND

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

Examples of efforts from Approach Two include, but are not limited to:

- Developing and implementing nutrition and physical activity policies at organizations with high proportions of people eligible for SNAP-Ed.
- Collaborating with schools and other organizations to improve the school nutrition environment, including serving on school wellness committees.
- Establishing community food gardens or farmers markets in low-income areas.
- Providing consultation, technical assistance, and training to SNAP-authorized retailers in supermarkets, grocery stores, a local corner or country store to provide evidence-based, multi-component interventions.

### OR

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

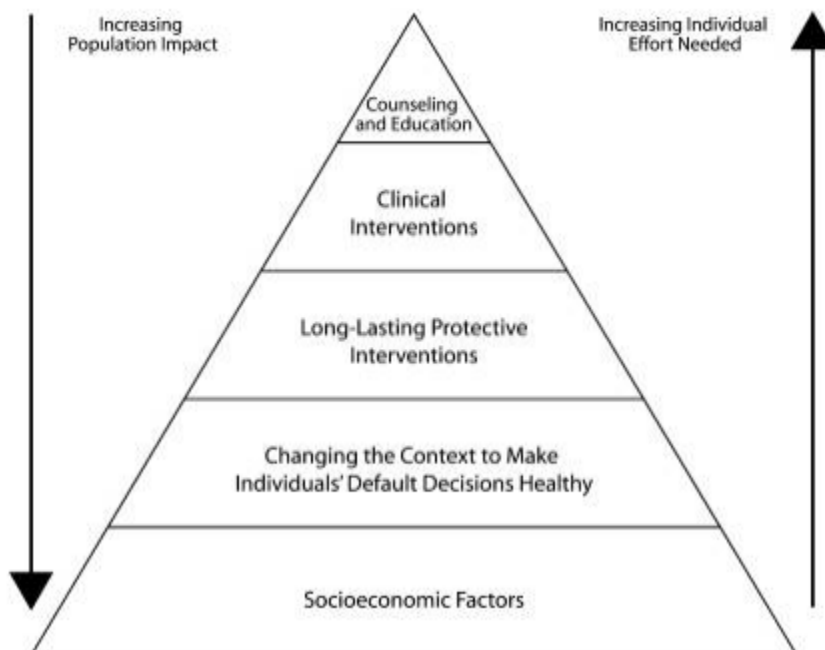
Approach Three activities to consider include, but are not limited to:

- Working with local governments in developing policies to improve healthy food access in low-income communities.
- Collaborating with community groups and other organizations to improve food, nutrition, and physical activity environments to facilitate the adoption of healthier eating and physical activity behaviors among the low-income population.
- Conducting community-wide health promotion activities, such as promoting the use of a walking trail through a Safe Routes to Schools program or the selection of healthy foods from vending machines.
- Partnering with non-profits hospitals to coordinate their mandated community benefits program with SNAP-Ed.

Approaches Two and Three are focused on PSE change efforts that create supportive environments in which people can engage in healthy behaviors. **FNS encourages the maximum use of PSE approaches.** Direct education can help people understand why and how to choose healthy foods and/or be physically active; but for long-term impact, SNAP-Ed programs must also engage in partnerships and multi-sector collaborations to address healthy eating and physical activity barriers to increase opportunities for healthy choices.

The Health Impact Pyramid illustrates the relative population impact and individual effort needed for five tiers of interventions: socioeconomic factors, changing the context to make individuals' default decisions healthy, long-lasting protective interventions, clinical interventions, and counseling and education. In this model, SNAP-Ed is providing nutrition education and working to change the context to make the healthy choice the easier [default] choice for participants. SNAP-Ed also coordinates and collaborates with agencies and community partners that address social determinants of health which are rooted in socioeconomic factors.

**The Health Impact Pyramid**



Source: Frieden TR. Framework for public health action: the health impact pyramid. Am J Public Health 2010;100:590–5. doi: 10.2105/AJPH.2009.185652

Changing health behaviors is complicated; working across the SEM with multi-component (direct education and PSE change strategies) SNAP-Ed programming will maximize impact. SNAP-Ed programs must include multi-level approaches that are related to one another to collectively have impact on the target populations' nutrition and physical activity behaviors.

### 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.

- Research-based evidence refers to relevant rigorous research, including systematically reviewed scientific evidence and other published studies and evaluation reports that demonstrate significant effects on individual behaviors, food/physical activity environments, or obesity prevention policies.
- Practice-based evidence refers to published or unpublished case studies, pilot studies, and evidence from the field on interventions that demonstrate obesity prevention potential.
- Emerging strategies or interventions are community- or practitioner-driven activities that have the potential for obesity prevention but have not yet been formally evaluated for obesity prevention outcomes. Emerging strategies or interventions require a justification for a novel approach and must be evaluated for effectiveness, which may include cultural or community-informed measures of success.

SNAP-Ed interventions and strategies must be evidence-based per SNAP-Ed definitions and implemented with fidelity (i.e., delivering an intervention or strategy as intended including using all core components and following established scope and sequence).

It is not enough for a direct education intervention or PSE strategy to have an evidence-base. Those being delivered must have evaluation outcomes that clearly demonstrate effectiveness of the intervention or strategy with the specific target audience(s) and/or communities being served.

For direct education, effective education strategies must include 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.

If adaptations are made to an evidence-based intervention or strategy to ensure delivery of culturally relevant programming, further justification and data are necessary to support that the intervention, as modified, can be expected to have the desired outcomes.

One resource to find potential interventions is the [SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States](#) (*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 use in Michigan. In addition, USDA FNS created a [checklist for evidence-based programs](#) to classify interventions according to levels of evidence.

### Social Marketing

In addition to direct education, social marketing programs have often been used to deliver nutrition messages to the SNAP-Ed audience.

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*In Michigan, MFF facilitates a statewide SNAP-Ed social marketing campaign on behalf of all funded SNAP-Ed programs.*

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### Policy, Systems, and Environmental (PSE) Change

Taken together, direct education, social 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 solely through direct education, PSE change efforts are optimized when combined with reinforcing educational or social marketing strategies implemented used in SNAP-Ed or by mission-aligned partners.

The 2020-2025 [Dietary Guidelines for Americans](#) recognizes that everyone has a role in helping support healthy eating patterns in multiple settings. PSE change strategies can be implemented across a continuum and may be employed on a limited scale as part of Approach Two or in a more comprehensive way through the community and public health approaches of Approach Three.

SNAP-Ed should be seen as a consultant and technical advisor for planning, creating, and evaluating PSE changes that benefit low-income households and communities. SNAP-Ed aids organizations so that they can adopt, maintain, evaluate, and enforce PSE changes themselves without continuous involvement from SNAP-Ed. This likely will also facilitate sustainable PSE changes as [non-SNAP-Ed] organizations take ownership of the PSE change.

Although FNS recognizes that SNAP-Ed resources may be needed on an ongoing basis to support changes as partner organizations build capacity, the [non-SNAP-Ed] organization that receives the consultation and technical assistance is ultimately responsible for adopting, maintaining, and enforcing the PSE change.



SNAP-Ed programs may consult and provide technical assistance on PSE changes that support healthy eating and physical activity without taking on or supplanting the responsibilities of Federal, State, and local program operators.

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

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

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*PSE changes should reflect input from partner organizations and community members served by the organizations. This is indicative of the concept that “no service system can be effective or sustained unless it is grounded in, reflective of, and has the full participation of the community it is designed to serve.”*

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**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:** 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.

	Examples of PSE Partnerships and Initiatives	Examples of PSE Change Strategies	
		<i>PSE Change Work</i>	<i>SNAP-Ed's Role</i>
<b>Policy</b>	Collaborating with community groups and other organizations such as Food or Nutrition Policy Councils to improve food, nutrition, and physical activity environments to facilitate the adoption of healthier eating and physical activity behaviors among the low-income population.	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.

<b>Systems</b>	Conducting health promotion efforts such as promoting use of a walking trail or selection of healthy foods from vending machines.	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.
<b>Environmental</b>	Delivering technical assistance to a local corner or country store to create a designated healthy checkout lane. Other activities might include providing training to retailers on healthy foods to stock and strategies to encourage people to purchase and use such foods or partnering with other groups on a healthy food financing initiative.	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 <a href="#">Dietary Guidelines for Americans</a> .	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.

## SNAP-Ed Evaluation

There are multiple types of intervention evaluations. The USDA evaluation definitions provided below describe types of evaluations:

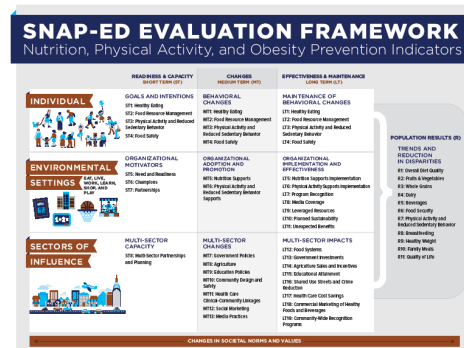
- **Formative Evaluation** is a type of program evaluation that usually occurs up front and provides information that is used during the development of an intervention [or when selecting strategies for delivering education]. Formative evaluation results are used to shape the features of the intervention itself prior to implementation. Examples include identifying healthy eating topics your participants are interested in learning about, the best days/time to offer lessons, or priority areas to focus on for PSE.
- **Process Evaluation** systematically describes how an intervention looks in operation or actual practice. It includes a description of the context in which the program was conducted (e.g., participants, setting, materials, activities, duration, etc.). It also determines if an intervention was implemented with fidelity (i.e., if an evidence-based intervention was delivered as designed and likely to yield the expected outcomes). Process evaluation can provide information that is crucial when making decisions about interventions or delivery methods. Areas assessed could include program value and enjoyment, appropriateness of topics or recipes, intent to change behaviors, or level of participant engagement.
- **Outcome Evaluation** addresses the question of whether anticipated group changes or differences occur in conjunction with an intervention. For example, using a standardized survey can demonstrate changes in participant intake of fruits and vegetables or increases in physical activity. Such evaluation indicates the degree to which the intended outcomes occur among the target population. It does not, however, provide definitive evidence that the observed outcomes are due to the intervention.
- **Impact Evaluation** allows one to conclude authoritatively whether the observed outcomes are a result of the intervention. To draw cause and effect conclusions, impact evaluations incorporate research methods that eliminate alternative explanations. This requires comparing those who receive the intervention (e.g., persons, classrooms, communities) to those who either receive no treatment or an alternative intervention.

The [SNAP-Ed Evaluation Framework: Nutrition, Physical Activity, and Obesity Prevention Indicators](#) (SNAP-Ed Evaluation Framework) identifies common indicators and outcome measures that support

documenting changes resulting from comprehensive SNAP-Ed programming. Practitioners must use the *SNAP-Ed Evaluation Framework* to identify indicators of success when implementing multi-level (across the SEM), multi-component (direct education and PSE change strategies) programming.

The *SNAP-Ed Evaluation Framework* can look overwhelming; to help navigate the framework, refer to the SNAP-Ed Approaches (page 3) and consider 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).



*A full-sized version of the SNAP-Ed Evaluation Framework can be found on page 45 in the SNAP-Ed at MFF Evaluation Requirements section.*

Across all levels of the *SNAP-Ed Evaluation Framework*:

- Short-term (ST) indicators relate to readiness to make a change.
- Medium-term (MT) indicators relate to adopting a change.
- Long-term (LT) indicators relate to maintaining a change.

Using the *SNAP-Ed Evaluation Framework* enables SNAP-Ed programs to monitor and evaluate the implementation and effectiveness of strategies and interventions while also communicating outcomes to SNAP-Ed stakeholders and funders.

USDA FNS has selected priority indicators:

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

*Michigan SNAP-Ed has identified additional priority indicators and related outcome measures (refer to page 41 in the SNAP-Ed at MFF Evaluation Requirements section).*

Any objectives defined by a SNAP-Ed program must be aligned with indicators and outcome measures and in SMART format. SMART format includes objectives that are **S**pecific, **M**easurable, **A**ppropriate, **R**ealistic, and **T**ime-specific.

## RE-AIM Model

USDA FNS encourages SNAP-Ed programs to use the RE-AIM (**R**each, **E**ffectiveness, **A**doption, **I**mplementation, and **M**aintenance) model for planning and evaluating the implementation of evidence-based interventions. Indicators in the *Environmental Settings* level of the *SNAP-Ed Evaluation Framework* are well-aligned with the RE-AIM model (see below). Following the model across *Environmental Settings*, from short-term changes through long-term changes, aligns an intervention or set of strategies with a systems approach leading to sustainable community-level changes. For more information on RE-AIM, visit [re-aim.org](https://re-aim.org).

SNAP-Ed Environmental Settings Indicator	SNAP-Ed Evaluation Framework Definition	RE-AIM Model Component
<b>ST5: Needs and Readiness</b>	Sites with an identified need or readiness for change in organizational settings or policies.	Organizational Readiness and Capacity-Building
<b>ST6: Champions</b>	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.	
<b>ST7: Partnerships</b>	Partnerships with service providers, community or organizational leaders, and SNAP-Ed representatives in settings where people eat, learn, live, play, shop, and work.	
<b>MT5: Nutrition Supports;</b>	Number of people who are impacted by a PSE change.	Reach
<b>MT6: Physical Activity and Reduced Sedentary Behavior Supports</b>	Number of organizations/sites that make at least one (1) change in writing or practice to expand access or improve appeal for healthy eating and active living.	Adoption
<b>LT5: Nutrition Supports Implementation;</b>	Intervention delivered with fidelity and the essential elements known to be important to the achievement of positive outcomes.	Implementation
<b>LT6: Physical Activity Supports Implementation;</b>	Improvements (e.g., improved assessment scores) in the food environment and/or organizational changes, policies, rules, marketing, and access that make healthy choices easier.	Effectiveness
<b>LT7: Program Recognition;</b>		
<b>LT8: Media Coverage;</b>		
<b>LT9: Leveraged Resources;</b>	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.	Maintenance
<b>LT10: Planned Sustainability;</b>		
<b>LT11: Unexpected Benefits</b>		

## SNAP-Ed Domains

To maintain consistency across states in reporting PSE changes, the *SNAP-Ed Evaluation Framework* categorizes SNAP-Ed settings into six domains – EAT, LIVE, LEARN, PLAY, WORK, and SHOP – 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.

Domains	Settings (examples)
<b>Eat</b>	Fast food chains, restaurants, mobile vending/food trucks, congregate meal sites/senior nutrition centers, or other places where people primarily go to “eat.”

<b>Live</b>	Faith-based centers/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.
<b>Learn</b>	Early care and education facilities; schools; afterschool, summer, and community youth organizations; Boys and Girls Clubs; YMCA; Cooperative Extension offices; or other places where people go to “learn.”
<b>Play</b>	Parks and recreation, bicycle and walking paths, school gymnasiums and fields, county fairgrounds, or other places where people go to “play.”
<b>Work</b>	Worksites with low-wage workers, job training programs/TANF worksites, or other places where people go to “work.”
<b>Shop</b>	Large food stores (4+ registers), small food stores ( $\leq 3$ registers), food banks and pantries, farmers markets, or other places where people “shop” for or otherwise access food.

## SNAP-Ed Target Audiences

SNAP-Ed programming is required to focus on eligible audiences. According to USDA, SNAP-Ed target audiences fall into four (4) main categories. Refer to the category descriptions below to determine qualifying target audience(s). Also, ask your MFF Program Manager about the *Qualifying SNAP-Ed Audiences* document for more information on ensuring you reach eligible audiences.

### Category 1 – Income-based:

Individuals eligible based on income.

- **1a-** Persons eligible for SNAP are eligible for SNAP-Ed. Additionally, **persons eligible for other means-tested Federal assistance programs**, such as Supplemental Security Income (SSI), Special Supplemental Program for Women, Infants, and Children (WIC), or Temporary Assistance for Needy Families (TANF) are eligible for SNAP-Ed.
  - “Means-tested Federal assistance programs” are defined as Federal programs that require the income and/or assets of an individual or family to be at or below specified thresholds to qualify for benefits. For SNAP-Ed, the threshold for qualifying an individual based on income is at or below 200% (in Michigan) of the Federal Poverty Guidelines.
- **1b-** College students- While college students are not typically eligible for SNAP and SNAP-Ed, there may be circumstances where they may qualify. Contact your MFF Program Manager for qualifications and associated guidance.

### Category 2 – Qualifying locations:

Persons at qualifying locations that serve low-income individuals such as:

- **2a-** Food bank, food pantry, or soup kitchen.
- **2b-** Public housing.
- **2c-** SNAP/TANF job readiness program site.
- **2d-** Summer meal site.
- **2e-** Other such sites (describe site).

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*Sometimes a potential audience for SNAP-Ed programming does not meet the pre-defined criteria outlined in the four target audience categories.*

*In these cases, SNAP-Ed programs can propose alternate targeting methodologies for SNAP-Ed audiences that are reviewed and approved by MFF.*

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### Category 3 – Locations serving low-income populations:

Persons at other locations when it can be documented that the location serves generally low-income persons **where at least 50% of persons have gross incomes at or below 200% (in Michigan) of poverty guidelines/thresholds.**



- **3a-** Persons residing in or locations identified in **qualified census tracts**.
  - For a statewide view of eligible tracts, go to [map2healthyliving.org](https://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.
    2. Click “Go”.
- **3b-** Persons residing in or locations identified in **qualified ZIP codes**.
  - ZIP code data is available from MFF upon request.
- **3c-** Persons residing in or locations identified in **qualified municipalities** (e.g., city, town, village).
  - Examine census data for the municipality. Beyond general household income census data for the municipality, if programming is planned for a specific age group, examine municipality income census data for that age group.
- **3d- Schools or childcare centers** where at least 50% of the persons have gross incomes equal to or less than 200% (in Michigan) of the poverty threshold.

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*In the past, schools where at least 50% of students were eligible to receive free/reduced priced school meals automatically qualified for SNAP-Ed. In the 2023-2024 school year, Michigan public schools will be able to offer free meals to all public-school students.*

*When school meals are no longer means-tested, SNAP-Ed providers must **use different methods to identify eligible schools** to ensure they are serving the SNAP-eligible population.*

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- **3e-** Location is a **garden** in a qualified geography (census tract, ZIP code, or municipality) or school and:
  - It is in an easily accessible area for SNAP-Ed eligible individuals, and
  - The garden directly serves SNAP-Ed eligible individuals at the site, or the produce grown is distributed at a partner site serving low-income individuals and families.
- **3f-** Location is a **worksite** and 50% of the employees at the worksite are at or below 200% (in Michigan) of the Federal Poverty Level.

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

Persons shopping at:

- **4a- Food retailers** that accept SNAP and/or WIC benefits. Although many retailers accept these benefits, SNAP-Ed activities should occur in locations which demonstrate significant patronage by low-income individuals and families. Stores located in census tracts, ZIP codes, or municipalities where at least 50% of persons have gross incomes equal to or less than 200% (in Michigan) of the poverty threshold may qualify as SNAP-Ed activity sites.
- **4b- Farmers markets** that accept food assistance benefits (at minimum, SNAP), are located in a SNAP-Ed qualified census tract, ZIP code, or municipality, and have a market manager that is supportive of the program and interested in engaging low-income shoppers.

FNS recognizes that SNAP recipients do not necessarily shop at the stores that are closest to where they live. Census tracts in some cases may not be the right measure. For example, in rural areas a particular store 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. [SNAP-Ed programs should] seek input from low-income individuals and families, and organizations that regularly serve low-income individuals and families, to understand the SNAP and WIC retailers that are preferred by low-income members of the community.

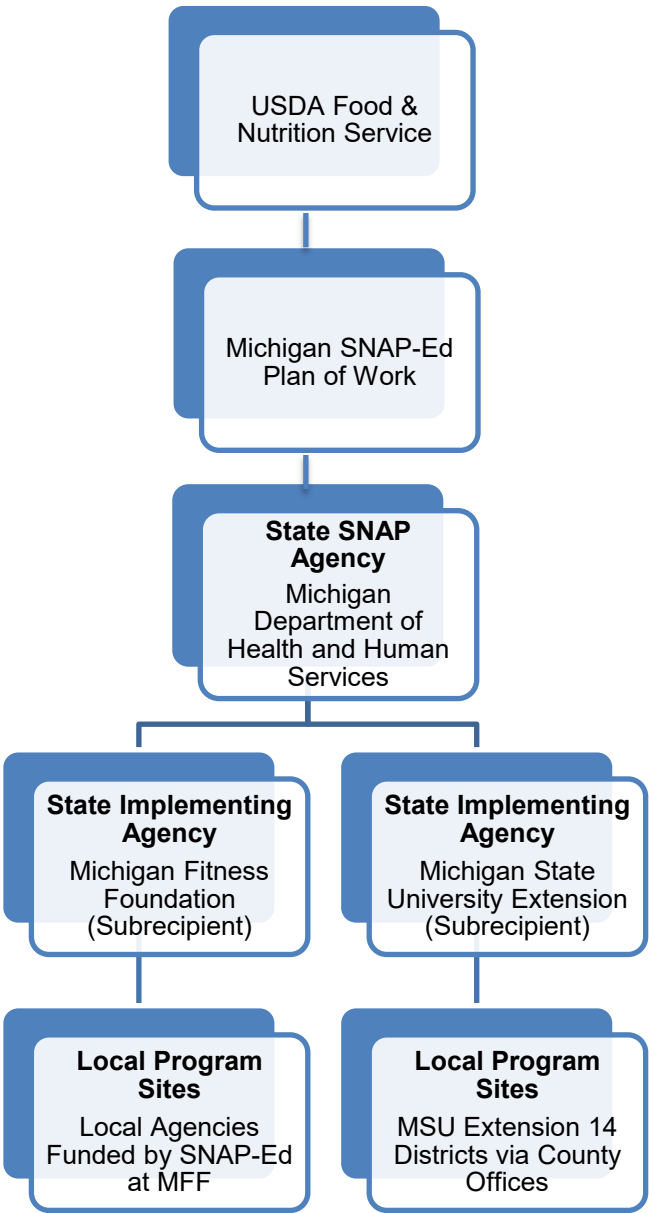
# SNAP-Ed in Michigan

## Michigan SNAP-Ed Vision

Improve nutrition and physical activity behaviors, as well as policies, systems, and environments, to prevent obesity- and diet-related chronic diseases, where Michigan SNAP-Ed-eligible residents eat, live, learn, play, work, and shop.

## SNAP-Ed in Michigan

*The chart below highlights the organizations involved with SNAP-Ed in Michigan. Additional information about the specific roles and responsibilities can be found in the USDA SNAP-Ed Guidance.*



## Michigan SNAP-Ed Goals

1. Increase vegetable and fruit consumption through direct nutrition education and food resource management strategies.
2. Increase physical activity and reduce sedentary behaviors through direct education and physical activity promotion strategies.
3. Increase access to affordable healthy foods, healthy beverages, and opportunities for physical activity through PSE efforts, multisector partnerships and coalitions.
4. Increase readiness to consume fruits and vegetables, healthy beverages, and be physically active by using evidence-based social marketing campaigns.
5. Improve access to and appropriateness of programming, including cultural relevance and honoring traditional practices, by offering innovative and responsive delivery structures and interventions/strategies.
6. Deepen relationships with underserved populations in Michigan, including Tribal entities, using ASNNA's Race, Health, and Social Equity principles for integrating equity into SNAP-Ed
7. Strengthen knowledge and ability of the Michigan SNAP-Ed workforce.

Local SNAP-Ed programs may also have secondary or intermediate behavioral outcomes consistent with other USDA FNS-aligned SNAP-Ed objectives:

- Improved behaviors associated with following a healthy eating pattern across the lifespan at an appropriate calorie level;
- Increased whole grain consumption (make half your grains whole);
- Switch to low-fat and fat-free milk and milk products; and
- Other intermediary behaviors toward outcomes (must be evidence-based).

MDHHS, MFF, and MSU Extension work collaboratively to ensure that SNAP-Ed best meets the needs of people eligible for SNAP throughout Michigan. Additionally, USDA FNS encourages states to coordinate activities implemented by USDA FNS nutrition assistance programs and initiatives. In Michigan, the Michigan State Nutrition Action Collaborative (MiSNAC) is a network of state-level organizations that receive funding from the USDA FNS that work together to connect and coordinate nutrition education programs and approaches. MFF represents local SNAP-Ed programs in MiSNAC.

## SNAP-Ed at the Michigan Fitness Foundation

In FY 2023, SNAP-Ed at MFF-funded programs and activities reached almost five million Michigan residents. MFF partners with more than 40 local and regional organizations that receive SNAP-Ed funding to deliver programming aligned with healthy eating and physical activity behavior change and creating supportive PSE change at sites, settings, and/or the community level.

**Framework.** MFF is a backbone organization, supporting local program delivery. This locally driven model empowers organizations and experts who understand participant and community needs and can align and deliver programming to address those unique needs. Organizations deliver evidence-based, comprehensive direct education, physical activity promotion, and PSE programming tied to identified community needs, addressing multiple levels of the social-ecological model (refer to page 3), and using collaborative, multisector approaches to reach SNAP-Ed focus audiences. Principles of health equity are integrated into community engagement approaches, program implementation, and PSE strategies to reduce inequities in healthy food access and environments that support physical activity.

**Coordination and Collaboration.** SNAP-Ed programs are required to coordinate their SNAP-Ed efforts with other organizations to advance healthy eating and physical activity behavior change and PSE change strategies. Working with community partners furthers SNAP-Ed's collaborative efforts, reduces the likelihood of duplication of effort, and aligns SNAP-Ed strategies with current public health practices for health promotion and disease prevention. MFF developed the *Map to Healthy Living*

(M2HL) website ([map2healthyliving.org](http://map2healthyliving.org)) to support cross-program and community collaboration in Michigan.

**Evaluation.** SNAP-Ed program evaluation is based on the *SNAP-Ed Evaluation Framework* (refer to page 45) and aligned with local program activities. MFF works with funded organizations to collaboratively develop a comprehensive evaluation plan, including SMART objectives. Evaluation focuses on process evaluation to assess program delivery and outcome evaluation with indicators and outcome measures at the Individual and Environmental Settings levels. Using the *SNAP-Ed Evaluation Framework*, MFF analyzes and synthesizes program data for SNAP-Ed at MFF programs. Refer to the SNAP-Ed at MFF Evaluation Requirements section (page 41) to learn more about evaluation strategies and requirements.

**Support Services.** MFF provides a variety of support services to organizations delivering local programming, including customized program, evaluation, and compliance technical assistance; intervention-, program-, and compliance-specific trainings; the statewide SNAP-Ed social marketing campaign; nutrition education and physical activity promotion curricula and PSE strategy adaptations for digital and cultural relevance; Nutrition Education Reinforcement Items (NERI), evaluation services, and the *Map to Healthy Living*.

### SNAP-Ed at MFF Annual Funding Opportunities

SNAP-Ed at MFF offers two options annually for organizations to receive funding and implement locally relevant SNAP-Ed programming:

- **Request for Proposals (RFP).** Organizations propose a comprehensive SNAP-Ed program that meets identified community needs and independently design and deliver highly effective programming within federal grant guidelines.

Proposals, including a conversation component, undergo an objective review process that includes external content-expert reviewers who score each proposal on how well the proposed evidence-based programming met identified community needs and included multilevel programming, and whether the organization demonstrated ability to independently implement a SNAP-Ed program.

Organizations who receive funding through the RFP process are known as subrecipient grantees.

- **Request for Applications (RFA).** Organizations apply to be contracted service vendors to deliver SNAP-Ed programming that MFF aligns with their identified community needs and organizational capacity.

Applications are reviewed to determine if they meet required eligibility criteria. Organizations who are selected to receive funding through the RFA process are contracted service vendors known as Community Impact Projects.

By applying for funding through SNAP-ED at MFF, organizations help maximize resources available for nutrition education and physical activity promotion in Michigan. Funded organizations reapply for SNAP-Ed at MFF funding annually.

### SNAP-Ed Program Funding

Funding for Michigan SNAP-Ed is provided by the USDA through MDHHS. Michigan's annually submitted SNAP-Ed Plan of Work is developed by MFF and MSU Extension in cooperation with MDHHS. MFF includes proposed local SNAP-Ed program activities in the Michigan Plan of Work. The

Plan of Work is reviewed by MDHHS and then submitted to USDA FNS for final review and approval. Typically, Plan of Work approval from USDA FNS is in late September. At any point during the review and approval process, Plan of Work amendments may be requested.

SNAP-Ed funding is distributed on a cost-reimbursement basis. SNAP-Ed funds are the reasonable and necessary expenses an organization incurs to implement SNAP-Ed activities. Those expenses are then submitted for reimbursement. All programming and grant management activities must comply with SNAP-Ed program financial and cost policies (refer to page 47 in the Program Parameters section). 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 USDA FNS and the goal and focus of SNAP-Ed.



# Grant Management

As an organization receiving funding through the RFP process, a subrecipient grantee has demonstrated the ability to independently design, deliver, and monitor a SNAP-Ed program and has a successful history in grant performance and management.

## What Does It Mean to Be a Subrecipient?

According to the Federal Uniform Guidance (2 CFR § 200.331), subrecipients are organizations that:

- Determine who is eligible [based on Target Audience criteria provided by USDA FNS] to receive what Federal Assistance [SNAP-Ed programming and resources];
- Have their performance measured in relation to whether program objectives were met;
- Have responsibility for programmatic decision making;
- Are responsible for adherence to applicable Federal program requirements specified in the Federal award [contract]; and
- In accordance with their agreement [contract], uses the Federal funds to carry out a program for a public purpose specified in authorizing statute [for SNAP-Ed: 7 CFR §272.2 (d)(2)(vii)(B)].

While subrecipients can independently implement a SNAP-Ed program, MFF provides support services through resources, tools, trainings, and ongoing technical assistance to help subrecipients ensure their programmatic, administrative, and financial compliance align with SNAP-Ed parameters and State and Federal regulations.

Local SNAP-Ed Program Leads at subrecipient organizations work closely with an assigned MFF Program Manager who provides individualized program consultation and coaching to help local SNAP-Ed programs achieve effective outcomes related to direct education and policy, systems, and environmental changes.

Subrecipients will participate, as needed, in site visits, meetings, and/or other technical assistance opportunities to ensure evidence-based programming is being implemented with fidelity and all program activities comply with SNAP-Ed guidelines. Refer to page 26 for details about subrecipient monitoring.

## Contract Process

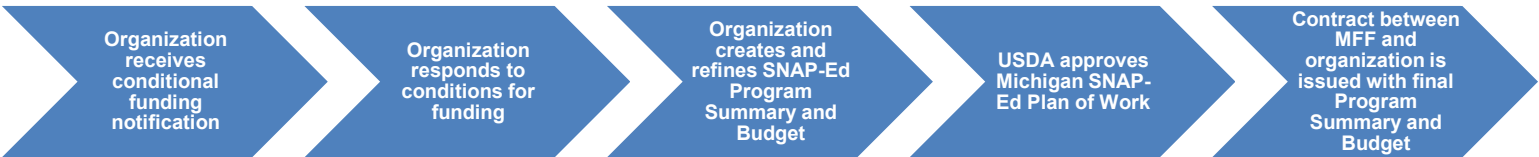
There are multiple layers of approvals that make up the contract process. Before a contract can be developed, proposed subrecipient program activities are included in Michigan's SNAP-Ed Plan of Work, which is sent to MDHHS and USDA for review.

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*Funding award amount adjustments may be made at any point in the approval process, or at the discretion of USDA. The funded organization will receive written notification of any funding award amount adjustments.*

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After USDA reviews and approves the Plan of Work, a subrecipient contract is established between MDHHS and MFF which in turn serves as the basis for the subrecipient contract between MFF and the subrecipient organization.



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*SNAP-Ed Program Summary and Budget (templates provided) must be updated and finalized based on funding award requirements and feedback.*

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The subrecipient contract between MFF and the funded subrecipient organization outlines expectations for and requirements of both entities. It is important for the local Program Lead to review and understand this document.

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*The SNAP-Ed at MFF subrecipient contract must be fully executed before any program costs are incurred and eligible for reimbursement.*

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## Required Program Start Up Documentation

Subrecipients are responsible for updating, completing, and submitting required program start up documentation to MFF. Refer to the table below for key program start up due dates.

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*It is recommended that you print and review the FY 2024 Start Up Due Dates table below to ensure you remain up-to-date and in compliance with these requirements.*

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### FY 2024 START UP DUE DATES

START UP ITEM	DUE DATE
<b>SNAP-Ed University</b> (Required training for local Program and PSE Leads and/or Lead Nutrition Educator)	August 2023
<b>Contract Execution</b> (With final Program Summary & Budget)	October 31, 2023
<b>SNAP-Ed 101 (Part 1 and 2)</b> (Required training for organizations new to SNAP-Ed and new Program and Finance Leads)	October 31, 2023 (or within 30 days of hire for new staff)
<b>Civil Rights Training and Certificate</b> (Required for all frontline and supervisory staff)	October 31, 2023 (or within 30 days of hire for new staff)
<b>DE Scope &amp; Sequence and PSE Work Plan</b> (For each intervention/strategy)	October 31, 2023 (or <u>before</u> programming begins)
<b>Social Media-Web Page Outline</b>	<u>Before</u> any activities (including posting content) are implemented
<b>Intervention-Specific Trainings</b>	<u>Prior to</u> intervention delivery
<b>Self-Guided Evaluation Training</b> (For Program Leads and Nutrition Educators)	<u>Before</u> data collection occurs
<b>M2HL Update Portal Training</b> (For M2HL and PSE reporting)	October 31, 2023 (or within 30 days of hire for new staff who will lead reporting)

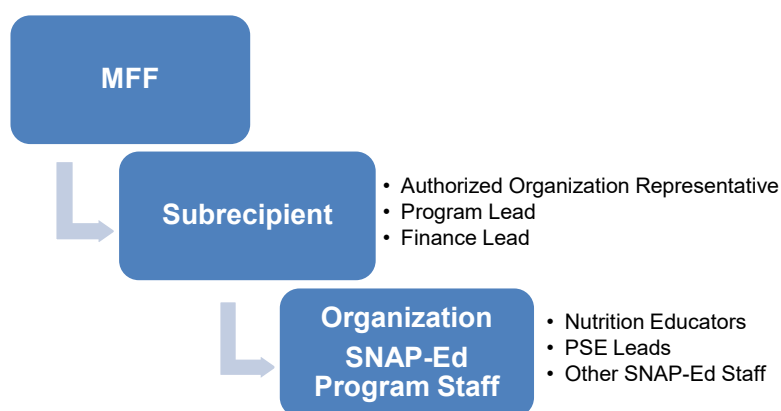
START UP ITEM	DUE DATE
<b>ServSafe Training &amp; Certification</b> (At least one supervisor overseeing food preparation needs current ServSafe certification)	October 31, 2023 (or within 30 days of hire for new staff)
<b>Access to the Partner Portal</b> (For key staff)	October 31, 2023 (or within 30 days of hire for new key staff)
<b>Access to Connect Space</b> (For key staff)	October 31, 2023 (or within 30 days of hire for new key staff)
<b>Current &amp; Pending Document</b> (For key staff)	December 15, 2023 (or within 30 days of hire for new staff or funding changes)
<b>Strategies for Collaboration and Non-Duplication</b>	December 29, 2023

Dates subject to change by MFF. For reporting due dates, refer to pages 27 and 28.

## Communication

Regular and ongoing communication will occur with your MFF Program Manager, Evaluation Specialist, and the Grant Operations Program Manager. As your programming coach and consultant, your MFF Program Manager will schedule regular meetings and site visits, as needed, to provide customized support for your SNAP-Ed program. An MFF Evaluation Specialist will work with you to develop a program evaluation plan, and the Grant Operations Program Manager will communicate with local Program and Finance Leads, as needed, for operations and compliance activities.

*Subrecipients are responsible for ensuring that MFF has the most current contact information of key organizational personnel for grant communication, including the Authorized Organization Representative, Program Lead, and Finance Lead.*



Additional important information is communicated by email to subrecipients using two methods: 1) group email messages using distribution software (Listserv) and 2) email messages directly from SNAP-Ed at MFF staff. Group messages are distributed through two main email lists: Program Lead list and Finance Lead list. These contact lists are generated using information provided during the contract process.

MFF uses Constant Contact for group email distribution. Some organizations automatically block Constant Contact. If this is the case for your organization, please contact your MFF Program Manager who will work to resolve the issue. If MFF changes email distribution platforms, notification will be sent to all SNAP-Ed at MFF subrecipients.

*The person at the organization who receives a communication from MFF, either through the Listserv or direct email, is responsible for sharing that content with the appropriate people at their organization.*

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## SNAP-Ed at MFF Tools

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MFF has many resources and tools available to subrecipients as a component of the technical assistance to support successful implementation of a SNAP-Ed program. Below is a list of the key tools subrecipients will access and use on a regular basis. Additional resources and tools are available on the SNAP-Ed at MFF website, *Partner Portal*, and from the SNAP-Ed at MFF Team.

**Connect Space** at [mff.connect.space](https://mff.connect.space) is the virtual learning platform used for live trainings, recordings, and virtual events.

**Evaluation Plan** – Your assigned MFF Evaluation Specialist will work with you to develop and implement an evaluation plan for your program. Refer to page 41 in the SNAP-Ed at MFF Evaluation Requirements section for details.

**Map to Healthy Living (M2HL) website** at [map2healthyliving.org](https://map2healthyliving.org) shows where SNAP-Ed at MFF programming is occurring in Michigan. It supports cross-program and community collaboration and allows users (e.g., SNAP-Ed implementers, community partners, funders, and decision-makers) to easily find, visualize, and share useful information about SNAP-Ed programming.

**Partner Portal\*** provides subrecipients access to resources and tools that help you manage your SNAP-Ed grant requirements and implement your SNAP-Ed program. It also includes an Evaluation Section where you can access survey protocols, survey order forms, barcoding information and fidelity logs as well as the annual recorded evaluation training.

To access the *Partner Portal*, follow the steps below.

1. Create an account by clicking the “My Account → Create Account” link at the top of the SNAP-Ed at MFF website home page [snap-ed.michiganfitness.org](https://snap-ed.michiganfitness.org). Account access is limited to Program and Finance Leads. You will receive an email message when your account is approved. Please allow 1-2 business days for the approval process.
2. Once your account is approved, you will be able to log in using the “My Account → Login” link, also on the SNAP-Ed at MFF website home page.

The *Partner Portal* is also where you order materials available to SNAP-Ed at MFF subrecipients, such as NERI and MiHOTM™ materials, and where you will submit monthly reports.

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### Using the *Partner Portal*

- When you log in to the *Partner Portal*, you will immediately be taken to the *Partner Portal* landing page which contains a section for evaluation and a section for reporting.
  - When hovering your mouse over the *Partner Portal* menu item, you will see a dropdown menu that includes access to ordering and other resources.
  - While logged into the *Partner Portal*, you will still have access to and be able to see the SNAP-Ed at MFF website and tabs.
  - If you remain logged in to the *Partner Portal* but navigate to different pages, clicking on the *Partner Portal* menu item will take you to the landing page.
- 

*\*The Partner Portal is different than the M2HL Update Portal (see below). They are two different websites. Logging into one site does not give you access to the other.*

**M2HL Update Portal** at [snap-ed.michiganfitness.org/m2hl-update-portal](https://snap-ed.michiganfitness.org/m2hl-update-portal) is an online tool that gathers SNAP-Ed at MFF program information into databases. Subrecipients update data quarterly (refer to page 23). The data and information entered are used for State and Federal reporting, in addition to helping determine gaps and opportunities in SNAP-Ed programming. A training webinar on entering data into the M2HL Update Portal is available at [snap-ed.michiganfitness.org/online-trainings](https://snap-ed.michiganfitness.org/online-trainings).

**Programming & Operations Manual (P&O Manual)** provides details about SNAP-Ed at MFF funding, reporting, compliance, programming, and evaluation expectations and requirements. You and your staff should review and become familiar with this content. Refer to the P&O Manual when making local program decisions and establishing justification for adjustments, amendments, or other changes.

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*If there are changes to the Guidance or other SNAP-Ed regulations, MFF will update the P&O Manual to remain consistent with Federal SNAP-Ed requirements. Updated versions will be available at: [snap-ed.michiganfitness.org/programming-operations-manual](https://snap-ed.michiganfitness.org/programming-operations-manual). Notification of changes will be made via the SNAP-Ed at MFF website and email communication.*

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**Program Summary and Budget** are documents included in your contract and outline the work you will complete and how you will complete it. These documents serve as the ultimate source of program activities and expectations for the contract period.

**SNAP-Ed at MFF website** at [snap-ed.michiganfitness.org](https://snap-ed.michiganfitness.org) includes information that will help you meet program requirements and support program improvement. This website is also where Program Leads access the *Partner Portal*.

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## Required Reporting

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It is recommended that you print and review the reporting due dates on pages 27 and 28.

### **Monthly Reporting**

#### **Monthly Program Highlights**

MFF submits brief monthly program highlights to MDHHS. These monthly program highlights should be uploaded to the *Partner Portal* on or before the 15th of each month, unless otherwise indicated. The highlights, when coupled with your monthly invoice, are intended to tell the story of your SNAP-Ed work, both direct education and PSE change efforts, and its impact on the people you serve during that particular month.

Program highlights must include the following:

- *Organization name* and *month* for which you are reporting; and
- A *one-paragraph overview* of the SNAP-Ed nutrition education, physical activity promotion, community-based events, and PSE efforts conducted that month, including major accomplishments and impact. If you encountered significant challenges to programming, please communicate these directly to your MFF Program Manager.

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*Avoid using acronyms and/or individual names (including names of SNAP-Ed staff) and clearly distinguish when other funding is used for activities and/or program supplies.*

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**PSE Strategies.** Provide a brief narrative of progress for each PSE strategy.

*Example: met with store manager at ABC small grocery store to discuss assessment results and outline next steps.*

*These high-level monthly narratives will help you track PSE progress that will be reported quarterly through the M2HL Update Portal.*

**Direct Education.** Describe each DE intervention in a bulleted list, such as:

- The number of classes taught/sessions held
- The number of participants engaged
- The number of food tastings and/or physical activity demonstrations that took place, including recipes used

Optional, but recommended:

- *Submit up to three quotes* per DE intervention or PSE strategy from participants, teachers/educators, administrators, community partners, etc. Quotes should highlight the impact your SNAP-Ed program is having on the people and communities you serve.
- *Include up to 5 photos* that best represent that month's DE and PSE work. To include photos, put them in a separate single MS Word document and include a brief one sentence description for each photo (i.e., photo1, description1; photo2, description2; etc.). Do not format photos into a collage as this makes it difficult to transfer photos. Note: There is a **25 MB limit** for all uploaded files.

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*A photo release for individuals must be on file at your organization (refer to page 53 for more information).*

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## Monthly Invoices

Reimbursement of allowable expenses is generated by an invoice. The invoice and supporting documentation should be uploaded to the *Partner Portal* on or before the 15<sup>th</sup> of each month, unless otherwise indicated.

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*The invoice template will be available online after October 1, 2023 at [snap-ed.michiganfitness.org/reporting](https://snap-ed.michiganfitness.org/reporting). Be sure to use the 'Subrecipient' version of the invoice template. MFF can customize the template for your organization upon request.*

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Invoice and documentation must include:

- Authorized signer's signature on the invoice; and
- Support documentation for expenses, which must:
  - Be easily verifiable against the invoice;
  - Have a date, be itemized, totaled, and show proof of payment (e.g., cash payment; check date, check #, and amount; or credit card transaction);
  - Clearly identify SNAP-Ed items when both SNAP-Ed and non-SNAP-Ed items are present;

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*All program expenses must be incurred within the fiscal year (October 1, 2023 – September 30, 2024). Expenses incurred outside of these dates are unallowable and will not be reimbursed.*

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- Include how the expense is tied to SNAP-Ed. Note details and description, as needed (e.g., intervention name/lesson, recipe name, % SNAP-Ed allocation, etc.); and,
- Include notation to identify abbreviated items on receipts.

Note key information on documentation for certain expenses to help expedite the invoice review process.

- *Mileage*: Traveler, date(s), purpose, to/from locations, addresses, number of miles, mileage rate used.
- *Meals and lodging* (allowable only for overnight travel): Purpose (e.g., event name), date(s) of event, location (e.g., city) of lodging even if not claiming lodging for reimbursement, proof of overnight status (e.g., agenda from event).
- *Food demonstrations/tastings*: Recipe name, name of associated intervention/lesson, number and date(s) of lesson(s), audience (e.g., Pre-K), number of people reached, etc.
- *Program supplies* purchased to deliver SNAP-Ed programming (e.g., supplies such as paper, markers, etc.) should be clearly noted as program expenses.
- If an expense requires pre-approval, attach justification and proof of pre-approval.

Aligned with the characteristics of a subrecipient, organizations must ensure that programmatic decisions, including expenditures, are allowable and adhere to applicable State and Federal program requirements. Justification that expenses are reasonable and necessary must be documented and kept on file, and can be requested at any time by MFF, MDHHS, and/or USDA FNS. Refer to the Program Parameters section (page 47) for more details about requirements, allowability, and how to provide a reasonable and necessary justification.

As a subrecipient, it is also the organization's responsibility to track, document, and keep on file SNAP-Ed staff time and effort (refer to the Program Parameters section for more detail). Time and Effort Reporting may be requested by MFF, MDHHS, and/or USDA FNS.

If questionable or unallowable items are present on an invoice, MFF will contact the Program Lead for details. If time does not allow for a thorough review and response, MFF may remove the expense(s) and process the balance of the invoice. If an issue is resolved to satisfaction, the questionable item(s) can be added to a future invoice.

## **Quarterly Reporting**

Subrecipients are required to enter the following data in the M2HL Update Portal (refer to page 21) on a quarterly basis (refer to the *Reporting Due Dates* on pages 27 and 28):

- PSE change progress made on SNAP-Ed Evaluation Framework Indicators aligned with your program evaluation plan; and
- SNAP-Ed program information, including site locations and programming description. This information is displayed on the M2HL website ([map2healthyliving.org](http://map2healthyliving.org)).

The M2HL Update Portal can be accessed at [snap-ed.michiganfitness.org/m2hl-update-portal](http://snap-ed.michiganfitness.org/m2hl-update-portal).

## **Annual Reporting**

In lieu of a mid-year report or March Program Highlights, subrecipients submit *Expanded Mid-Year Program Highlights*. These highlights should follow a similar format as the monthly program highlights but must be written as a summary of the DE and PSE activities that occurred between October 1 – March 31. They should include an overview of key activities, major accomplishments and successes, and any barriers you experienced.

A *Year-End Report* is required. You will receive a reporting template and instructions on how to submit the report closer to the reporting date. The Year-End Report should be submitted to MFF on or before November 3, 2023.

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*Year-End reporting consists of multiple components and the due dates for each component are staggered from mid-October into early November. MFF will provide details closer to the reporting dates.*

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An *Equipment Inventory* must be submitted to MFF with the Year-End Report. Equipment included in the inventory is defined as "anything that plugs in or recharges by plugging in, and costs less than \$5,000." Use the Equipment Inventory template, found at [snap-ed.michiganfitness.org/reporting](https://snap-ed.michiganfitness.org/reporting), to track your equipment purchases.

### **Required Report Submission**

Monthly and annual reporting must be submitted via the *Partner Portal*. To submit these reports:

1. Log in to the *Partner Portal* at [snap-ed.michiganfitness.org/partner-portal](https://snap-ed.michiganfitness.org/partner-portal).
2. Click the "Get Started" button in the Reporting section.
  - To submit a *monthly invoice*, click the "Get Started" button in the Invoices section and follow the instructions provided.
  - To submit a *monthly or Expanded Mid-Year Program Highlight* report, click the "Get Started" button in the Highlights section and follow the instructions provided. NOTE: Monthly Program Highlights must be submitted as Microsoft Word documents.
  - Submission instructions for the *Year-End Report* will be shared closer to reporting due dates.

Quarterly reporting is done and submitted via the M2HL Update Portal: [snap-ed.michiganfitness.org/m2hl-update-portal](https://snap-ed.michiganfitness.org/m2hl-update-portal).

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## Reimbursement

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SNAP-Ed funds are Federal pass-through funds and, therefore, distributed on a cost-reimbursement basis. A SNAP-Ed subrecipient organization incurs reasonable and necessary expenses to implement SNAP-Ed activities, pays those expenses, submits those expenses via a monthly invoice to MFF, and is reimbursed for those expenses after accurate completion and MFF review of the invoice. It is important for your organization to understand the cash flow management that is required with cost-reimbursement funding awards (refer to page 25 for reimbursement process).

It is critical that monthly invoices and supporting documentation are correct and include appropriate notations; incorrect or incomplete reporting may result in a delay of your reimbursement or only partial reimbursement (refer to page 22 for details on monthly invoices).

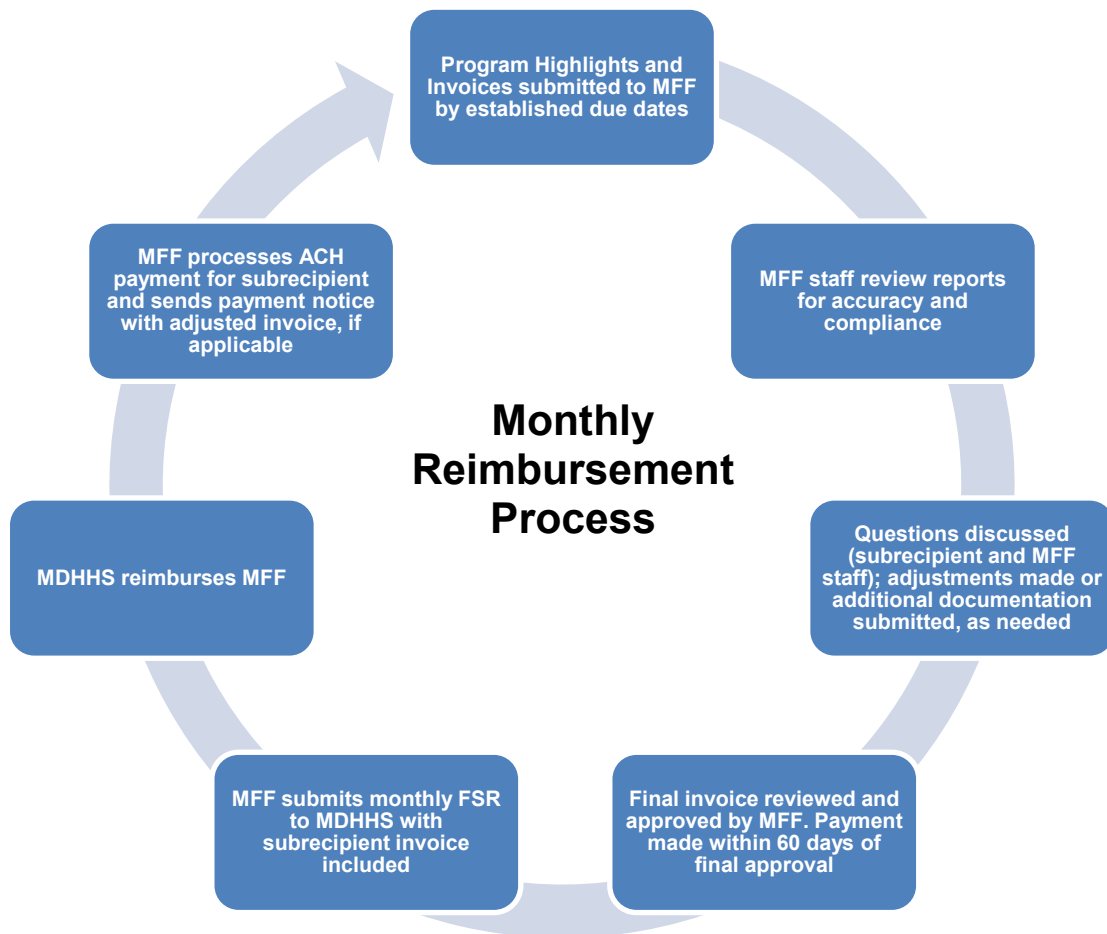
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*All program and administrative activities must be allowable through SNAP-Ed, and these activities must comply with SNAP-Ed program financial and cost policies (refer to page 47).*

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After an invoice is submitted to MFF, it goes through program and administrative review. Upon final approval, it is included in MFF's monthly Financial Status Report (FSR) to MDHHS. MFF has 60 days to pay your invoice after final approval. MDHHS reimburses MFF. Then MFF reimburses subrecipients for the invoices included in MFF's FSR to MDHHS.

MFF pays subrecipients via ACH transactions. An email is sent notifying you that a payment will be received within 3 business days. If adjustments were made to the invoice, a memo describing the changes and a copy of your adjusted invoice are attached to the payment notice email.



## Program Budget and Contract Amendments

It is important to keep an ongoing dialogue with your MFF Program Manager to talk about any needed programming and/or budget changes aligned with evolving community needs and opportunities. Proposed changes must be rooted in local need, be reasonable and necessary, and align with SNAP-Ed parameters. Some changes will be minor and require an updated Program Summary and/or Budget to be on file; more significant changes will require a contract amendment. You will work with your MFF Program Manager to prepare and submit any required documentation.

*Program contract amendments* are required if you propose any change significantly impacting the scope of work outlined in the final Program Summary included in your contract. (Example: adding a new intervention reaching an audience your SNAP-Ed program is not currently serving.)

*Budget contract amendments* are required for adjustments representing more than 10% or \$5,000 of a budget category (whichever is greater) and any changes in indirect cost rate/amount or cost allocation methodology. Budget amendments must be made before August 15, 2024. Requests for a budget amendment need to include:

- A memo on your organization's letterhead outlining the amount(s) of money you propose moving, summarized by budget category (not line item); reason(s) for the change(s); and how the change(s) will impact programming. It should include the following:
  - An updated Budget Worksheet reflecting proposed change(s); and
  - A discussion of these changes with your MFF Program Manager.

NOTE: Funding cannot exceed what was included in your SNAP-Ed at MFF subrecipient contract.

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## Record Retention

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As a subrecipient, you are responsible for retaining and maintaining all grant records including conditional funding award letter, subrecipient contract, financial records, supporting documents, statistical records, and all other records pertinent to your funding award for a period of **four (4) years** after fiscal closure (final payment).

- If any litigation, claim, or audit is started before the expiration of the four-year period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- Records for real property and equipment acquired with Federal funds shall be retained for four (4) years after final disposition.
- A site visit or audit can be conducted by MFF or MDHHS at any time for any reason within this four-year period.

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## Subrecipient Monitoring

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Subrecipient monitoring is based on the Federal regulations in 2 CFR Part 200 of the Uniform Guidance. MFF uses a compliance monitoring framework to complete periodic assessments of subrecipients' programmatic, administrative, and financial strengths and opportunities. The output will be key in developing tailored subrecipient monitoring plans which may include:

- Virtual or in-person meetings;
- Email communication;
- Informal or formal visits to your office or programming sites;
- Participation in your local SNAP-Ed events;
- Feedback provided during invoice and monthly highlights review;
- Compliance review (managing due dates and meeting program and operations requirements); and
- Reporting (quality and timeliness).

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



## Reporting Due Dates

The tables below outline the required financial and reporting due dates remaining for FY 2023 as well as the due dates for FY 2024.

### REMAINING FY 2023 REPORTING DUE DATES

REPORT	DUE DATE
Invoice – August Program Highlights – August	September 15, 2023*
Invoice – September <b>No Program Highlights Due</b> Information is captured in the Year-End Report	October 6, 2023*
FY 2023 Year-End Report	November 3, 2023**
Equipment Inventory	November 3, 2023**

\*Date subject to change at the request of MDHHS and MFF.

\*\*Year-End reporting consists of multiple components and the due dates for each may be staggered from mid-October into early November. Details will be provided closer to the reporting dates.

### FY 2024 REPORTING DUE DATES

REPORT	DUE DATE
Invoice – October Program Highlights – October	November 15, 2023
<b>M2HL Update Portal</b> Program & location updates	<b>November 30, 2023</b>
Invoice – November Program Highlights – November	December 15, 2023
Invoice – December Program Highlights – December	January 16, 2024
<b>M2HL Update Portal</b> PSE progress; program & location updates	<b>January 16, 2024</b>
Invoice – January Program Highlights – January	February 15, 2024
Invoice – February Program Highlights – February	March 15, 2024
Invoice – March <b>Expanded Mid-Year Program Highlights</b> Summative in nature, covering October 1–March 31	<b>April 15, 2024</b>

REPORT	DUE DATE
<b>M2HL Update Portal</b> PSE progress; program & location updates	<b>April 15, 2024</b>
<b>Invoice – April</b> <b>Program Highlights – April</b>	May 15, 2024
<b>Invoice – May</b> <b>Program Highlights – May</b>	June 17, 2024
<b>Invoice – June</b> <b>Program Highlights – June</b>	July 15, 2024
<b>M2HL Update Portal</b> PSE progress; program & location updates	<b>July 15, 2024</b>
<b>Invoice – July</b> <b>Program Highlights – July</b>	August 15, 2024
<b>All Program Evaluations Completed and Submitted</b> Unless programming is provided in September	<b>August 30, 2024</b>
<b>Invoice – August</b> <b>Program Highlights – August</b>	September 16, 2024*
<b>Invoice – September</b> <b>No Program Highlights Due</b> Information is captured in the Year-End Report	Invoice TBD*
<b>FY 2024 Year-End Report</b>	November 1, 2024**
<b>Equipment Inventory</b>	November 1, 2024**

\*Date subject to change based on year-end calendar established by MDHHS and MFF. Notification of the August and September due dates will be sent closer to the reporting dates.

\*\*Year-End reporting may consist of multiple components and the due dates for each may be staggered from mid-October into early November. Details will be provided closer to the reporting dates.

# SNAP-Ed Assurances

As part of the RFP process, your organization submitted a Letter of Intent as well as compliance, program, and evaluation assurances that are aligned with Federal SNAP-Ed Guidance. These documents outline eligibility criteria to receive Federal SNAP-Ed funds and requirements associated with implementing a SNAP-Ed program. By signing these documents, your organization committed to the outlined expectations and actions to ensure compliance with Federal, State, and SNAP-Ed at MFF guidelines. The Letter of Intent and all assurance documents are included in this section for reference.

The *Letter of Intent (LOI)* (page 30) and the *Compliance Assurances* (page 32) certify that your organization understands the SNAP-Ed Federal funding requirements, is eligible to receive Federal funding, and will conduct allowable, reasonable, and necessary SNAP-Ed program activities in accordance with the Programming and Operations Manual for Subrecipients and SNAP-Ed Guidance. The *LOI* was reviewed, verified, and signed by the Authorized Organization Representative. The *Compliance Assurances* were reviewed, verified, and signed by the Authorized Organization Representative, Organization Financial Representative, and Program Lead. These documents were submitted with your FY 2024 SNAP-Ed proposal.

The *Program Assurances* (page 35) certify acceptance of the provisional award amount, that conditions for funding will be followed, and that program planning and delivery will be completed in accordance with SNAP-Ed guidance, requirements, and assurances put forth by USDA, MDHHS, and/or MFF. These *Program Assurances* were reviewed, verified, and signed by the Authorized Organization Representative, Organization Financial Representative, and Program Lead and were submitted with your organization's response to your FY 2024 subrecipient provisional award letter.

The *Evaluation Assurances* (page 37) were reviewed, verified, and signed by the Authorized Organization Representative and Program Lead and were submitted with your FY 2024 SNAP-Ed proposal. They certify that your organization will use SNAP-Ed at MFF evaluation tools, including process and outcome evaluations for all PSE and direct education (DE) initiatives, and will collect and report required USDA FNS data.

## LETTER OF INTENT

### Request for Proposals (RFP) for Subrecipients

#### SNAP-Ed at Michigan Fitness Foundation (MFF) Fiscal Year 2024 (October 1, 2023 – September 30, 2024)

A Letter of Intent (LOI) is *required* for all organizations interested in applying for the Fiscal Year (FY) 2024 Request for Proposals (RFP) for subrecipients.

Use the template below to complete a LOI. **The submitted LOI must be placed on your organization's official letterhead, include content for all five components listed in the template, and have an original signature of an authorized representative** (electronic signatures accepted).

Electronically submit the LOI (as a Word or PDF file) at [snap-ed.michiganfitness.org/request-for-proposals/letter-of-intent](https://snap-ed.michiganfitness.org/request-for-proposals/letter-of-intent) by **4:30 pm EST on March 20, 2023**. LOIs received before March 20 will be reviewed on a rolling basis.

For questions, email: [SNAP-EdAtMFF-RFP@michiganfitness.org](mailto:SNAP-EdAtMFF-RFP@michiganfitness.org).

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**Organization name:**

**Contact person:**

**Phone number:**

**Email:**

**Estimated FY 2024 funding request:** \_\_\_\_\_

**Provide a brief (500 words or less in total) summary of the following:**

1. Overview of your proposed SNAP-Ed program, including:
  - Anticipated focus community(ies), audience(s), and setting(s).
  - How you anticipate your proposed policy, systems, and environmental change (PSE) strategies will work with proposed direct education interventions to increase healthy behaviors and improve supports for those healthy behaviors.
2. How your proposed SNAP-Ed program aligns with your organization's mission and current and/or future work.
3. Why your organization is well-positioned to do this work in the focus community(ies).
4. Capacity of your organization to do this work and comply with grant program and operations requirements (e.g., staffing, expertise, community relationships/support, existing systems/procedures/infrastructure, other resources, etc.).
5. How your proposed SNAP-Ed program will advance health equity in your focus community(ies) and work to build sustainable community change.

**By signing below, I acknowledge that my organization:**

- Is a public entity and/or receives public money (e.g., a political jurisdiction, parks and recreation department, health department, college or university, public school districts, Indian Tribal Organizations, or other public organizations).

**OR**

Is a nonprofit organization with private cash donations. The cash donations are not given in connection with any endorsements of donors or products related to the nutrition education activities, do not benefit the donor or revert back to the donor, and do not have any restriction on their use.

- Reviewed the [Subrecipient Backgrounder](#) and the [\(FY 2024\) Request for Proposals \(RFP\) Process Overview](#) and understands eligibility and grant-specific criteria subrecipients.
- Understands that SNAP-Ed at MFF funding is awarded annually and subject to federal funding availability.
- Understands that SNAP-Ed at MFF funding is managed on a **cost-reimbursement basis**. This means that my organization incurs expenses by implementing approved activities, and these expenditures are reimbursed to the organization upon accurate completion of monthly invoices. Expense reimbursement is contingent on MFF approval and will only cover allowable expenses incurred in FY 2024. My organization also recognizes the cash flow management that is required with cost-reimbursement awards.
- If funded, will provide allowable nutrition education, physical activity promotion, and policy, systems, and environmental (PSE) change activities to SNAP-eligible audiences: SNAP participants, low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs, and individuals residing in communities or attending schools with a significant low-income population. Programming will focus on the four Target Audiences that qualify by income, location, geography, and/or retail shoppers served. (Refer to the [Subrecipient Backgrounder](#) for more details on eligible audiences.)
- If funded, will complete approved activities within FY 2024 and will not use subcontractors to complete SNAP-Ed work.

Authorized signer: \_\_\_\_\_ Print name: \_\_\_\_\_

Position at organization: \_\_\_\_\_ Date: \_\_\_\_\_



## SNAP-ED COMPLIANCE ASSURANCES

### Subrecipients

#### SNAP-Ed at Michigan Fitness Foundation (MFF) Fiscal Year 2024 (October 1, 2023 – September 30, 2024)

To be eligible for Fiscal Year (FY) 2024 funding as a subrecipient through SNAP-Ed at Michigan Fitness Foundation (MFF), your organization must agree to comply with the SNAP-Ed Compliance Assurances outlined below. This document must include the original signatures (electronic signatures accepted) of all three representatives listed: the authorized organization representative, organization financial representative, and lead program representative.

1. The Michigan Department of Health and Human Services (MDHHS) is the state's SNAP agency. MDHHS is accountable for the content of Michigan's SNAP-Ed and provides oversight to all implementing agencies.
2. All SNAP-Ed subrecipients must be responsible for the allowability of activities they provide that are funded with SNAP-Ed funds (CFDA #10.561) and are liable for repayment of unallowable costs.
3. Program activities will be conducted in compliance with all applicable Federal laws, rules, and regulations including FNS Civil Rights Instructions 113-1 and OMB Uniform Guidance (UG) governing administrative requirements, cost principles, and audit requirements.
4. Organization will comply with the provided [Subrecipient Programming & Operations Manual](#) and the SNAP-Ed Guidance. Updates may be issued by MFF and/or United States Department of Agriculture (USDA) and replace previous versions. All SNAP-Ed Programs will need to adjust programming for compliance when necessary.
5. Organization meets all of the proposal eligibility requirements outlined on the [FY 2024 Request for Proposals \(RFP\) webpage](#) and in the [FY 2024 Request for Proposals \(RFP\) Process Overview](#).
6. Subrecipient contracts will be awarded through an annual competitive proposal process that considers merit, effectiveness, history of compliance, alignment with SNAP-Ed goals, impact or potential impact, program efficiency, and is subject to available funds. Not all proposals will receive SNAP-Ed funding or funding at the level requested. MFF reserves the right to amend an awarded proposal.
7. Organization understands that SNAP-Ed at MFF funding is managed on a cost-reimbursement basis. This means the funded organization incurs expenses by implementing the approved activities included in its contract, and these expenditures are reimbursed to the organization upon accurate completion of monthly invoices. Expense reimbursement is contingent on MFF approval and will only cover allowable expenses incurred in FY 2024. Organization also recognizes the cash flow management that is required with cost-reimbursement awards.
8. Documentation of costs and payments for approved SNAP-Ed activities will be provided to MFF as required by reporting requirements. All original documentation will be maintained by subrecipient and be available for USDA, MDHHS, and/or MFF review and audit.

9. Any additional funds secured to deliver all or a portion of this work will be disclosed to MFF upon confirmation of additional funds.
10. Organization has the capacity to adhere to the procurement standards outlined in the OMB Uniform Guidance (UG).
11. Criminal background checks and national and state sex offender registry checks will be conducted or caused to be conducted for each new employee, employee, contractor, contractor employee, or volunteer who has direct contact with client populations, has access to confidential information, or is directly supervising those listed above, in accordance with contract and grant guidelines.
12. Organization will complete approved activities from their proposal and included in their contract within FY 2024 and will not use subcontractors to complete SNAP-Ed work.
13. All programming and aligned budget must be pre-approved by MFF, including any changes that occur after the FY 2024 Plan of Work is approved by USDA.
14. Program activities will be reasonable and necessary to accomplish SNAP-Ed goals and objectives. 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 goal and focus of SNAP-Ed.
15. Efforts must focus on providing SNAP-Ed to SNAP participants and/or eligible recipients. Organization will provide allowable nutrition education, physical activity promotion, and policy, systems, and environmental change initiatives to SNAP participants, low-income individuals eligible to receive SNAP benefits or other means-tested Federal assistance programs, and individuals residing in communities or attending schools with a significant low-income population. (Refer to the [Subrecipient Backgrounder](#) for details regarding each audience eligibility category.)
16. Program activities focusing on USDA Food & Nutrition Service (FNS) clients already receiving nutrition education must be designed to provide new information and cannot supplant or duplicate existing nutrition education programs or policy, system and environmental change initiatives. Where operating in conjunction with existing programs and/or initiatives, SNAP-Ed program activities must enhance and supplement them.
17. SNAP-Ed programming delivered will be offered free of charge.
18. Program site locations must be updated in the [Map to Healthy Living Update Portal](#) as required by MFF.
19. All materials developed (hard copy and digital), printed, or re-printed/disseminated with SNAP-Ed funds must include the required USDA non-discrimination statement and credit statement. All materials must be pre-approved by MFF.
20. Nutrition education and obesity prevention messages will be consistent with the current [Dietary Guidelines for Americans](#) and stress the importance of variety, balance, and moderation, and they will not disparage any specific food, beverage, or commodity.

We have reviewed the above information, the submitted proposal package and budget, and verify the information is accurate and affirm our organization will comply with all of the Assurances stated above.

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Signature of Authorized Organization Representative	Date
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Print Name	Title
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Signature of Organization Financial Representative	Date
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Print Name	Title
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Signature of Lead Program Representative	Date
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Print Name	Title
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## SNAP-Ed Program Assurances

### SNAP-Ed at Michigan Fitness Foundation (MFF) Subrecipient Grantees Fiscal Year 2024 (October 1, 2023 – September 30, 2024)

To be eligible for FY 2024 SNAP-Ed funding from MFF as a subrecipient grantee, organizations must agree to the Assurances outlined below.

By signing these Assurances, it signifies:

- Acceptance of the provisional award amount. \_\_\_\_\_ (Authorized Organization Representative Initials)
- The SNAP-Ed Program Lead and Finance Lead at the organization have read and understand the FY 2024 Provisional Funding Award Letter and any necessary clarifications and/or required conditions for funding and agree to the following statements:
  1. Required changes to programming and budget outlined in the FY 2024 Provisional Funding Award Letter and any reviewer feedback on recommended program and budget improvements shared by MFF supersede content included in your submitted FY 2024 proposal.
  2. In response to all FY 2024 conditions for funding, program and budget improvement feedback, and provisional funding amount, changes will be incorporated into your Program Summary and updated budget before the FY 2024 program year begins on October 1, 2023. SMART Objectives and Evaluation Plan (process and outcome evaluation) will be developed in coordination with MFF.

The organization assures that it will:

3. Use program and budget improvement feedback from reviewers to inform program planning and continuously build out quality programming.
4. Design and deliver programming based on a current, strong community-based needs assessment and ensure chosen interventions and strategies align with and respond to the needs of the identified focus audiences and communities.
5. Commit to providing high quality culturally and contextually relevant programming to meet localized needs of identified eligible focus audiences and communities.
6. Design and deliver a comprehensive program that meets unique, localized needs and includes a balance of direct education (DE) interventions, policy, systems, and environmental change (PSE) strategies, and aligned supplemental materials.
7. Use only evidence-based interventions and strategies (research-tested, practice-based, or emerging) in SNAP-Ed programming that show there is a likelihood of positive impacts on identified focus audiences and communities.

8. Develop and follow a clear scope and sequence for each DE intervention and PSE strategy.
9. Use community engagement strategies and multi-sector collaborative approaches to engage with community residents and agencies (both SNAP-Ed and non-SNAP-Ed funded) in SNAP-Ed program design and delivery to advance SNAP-Ed goals and activities, leverage community resources, and build sustainability.
10. Deliver all programming (DE and PSE) with fidelity while considering unique community needs and cultural relevancy.
11. Adhere to all evaluation requirements as outlined in the signed *Evaluation Assurances* included with the submitted FY 2024 proposal package, including developing and following plans for both process and outcome evaluation, meeting statewide evaluation requirements, and reporting.
12. Comply with the signed *SNAP-Ed Compliance Assurances* included with the submitted FY 2024 proposal package.
13. Be accountable for the programmatic, administrative, and financial aspects of the program and must understand and comply with guidance and requirements put forth by United States Department of Agriculture, Michigan Department of Health and Human Services, and MFF.

I have reviewed the above information, verify the information is accurate, and affirm our organization will comply with all the Assurances stated above.

\_\_\_\_\_  
Authorized Organizational Representative

\_\_\_\_\_  
Program Lead

\_\_\_\_\_  
Title

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

\_\_\_\_\_  
Finance Lead

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date



## SNAP-ED EVALUATION ASSURANCES

### Subrecipients

#### SNAP-Ed at Michigan Fitness Foundation (MFF)

#### Fiscal Year 2024 (October 1, 2023 – September 30, 2024)

Evaluation is an important and required component in SNAP-Ed. All SNAP-Ed at Michigan Fitness Foundation (MFF) projects and programs undergo evaluation. It helps us understand what happened and to whom as a result of SNAP-Ed interventions and strategies. It also provides a framework to package and share these results with key stakeholders (e.g., USDA, MDHHS, etc.) to tell the story of SNAP-Ed impact in Michigan.

The evaluation tools used in all SNAP-Ed at MFF funded programs to measure individual behavior change are brief dietary assessments and physical activity surveys. MFF will work alongside SNAP-Ed at MFF funded programs to identify evaluation approaches (quantitative and/or qualitative) and data collection methods that are most appropriate for capturing planned policy, systems, and environmental (PSE) changes. Tools have been carefully selected based on minimizing the burden on program participants/communities and local program staff. Results across programs will be combined to assess the effectiveness of statewide SNAP-Ed programming in increasing fruit and vegetable consumption and physical activity behaviors, as well as demonstrate individual program effectiveness.

In Fiscal Year (FY) 2024, all SNAP-Ed at MFF funded subrecipients will use these tools as well as collect and report reach information required by USDA. SNAP-Ed MFF evaluation tools will include process and outcome evaluations for all policy, systems, and environmental change (PSE) and direct education (DE) initiatives.

**Read each item below and respond to the statements by checking the boxes.**

#### 1. Policy, Systems and Environmental Change Outcomes

All programs must collect outcome evaluation data for policy, systems, and environmental change initiatives, highlighting the SNAP-Ed contribution to those PSE outcomes. An outcome evaluation includes drawing a conclusion about the effectiveness of strategies implemented to achieve desired PSE changes to improve nutrition and physical activity access and supports. Outcome evaluation must align with the indicators and outcome measures included in the [SNAP-Ed Evaluation Framework Interpretive Guide](#) and include approved evaluation instrument(s) to collect data.

##### Required Indicators

**Every program** must measure and report on the following indicators for PSE, as aligned with your approved program:

- *At least one of: ST5. Readiness and Need, ST6. Champions, ST7. Organizational Partnerships*
- *MT5. Nutrition Supports and, as applicable, MT6. Physical Activity and/or Reduced Sedentary Behavior Supports*

**In addition, every program must measure and report on the following SNAP-Ed indicators, if the following conditions are met:**

- *ST8: Multi-Sector Partnerships and Planning: reporting of SNAP-Ed contributions* is required if you have implemented SNAP-Ed programming for **at least two (2) full program years**
- *LT5: Nutrition Supports Implementation and/or LT6: Physical Activity Supports Implementation* is required if you have adopted SNAP-Ed MT5 Nutrition Supports and/or MT6 Physical Activity/Reduce Sedentary Behavior Supports PSE change(s) **within the last three (3) program years**

**NOTE:** Reporting on other PSE indicators related to specific programming may be required as determined by your MFF evaluator.

All data for indicators ST5, ST6, ST7, ST8, MT5, MT6, LT5, and LT6 are required to be entered into the Map to Healthy Living Update Portal to report progress on those indicators (as appropriate) per the quarterly PSE reporting schedule determined by MFF.

**Have you reviewed and do you understand the requirement for PSE outcome evaluation as described above?**

☐ Yes

☐ No

## 2. Direct Education Behavior Change Outcomes

All programs must collect direct education outcome evaluation data for behavior change using the SNAP-Ed at MFF evaluation tools. SNAP-Ed at MFF will provide a Survey Guide to all participating agencies to identify who, what, and when to use the evaluation tools provided. It is mandatory that the Survey Guide be closely followed.

Outcome evaluation must align with the indicators and outcome measures included in the [SNAP-Ed Evaluation Framework Interpretive Guide](#). Outcome evaluation includes drawing a conclusion about the effectiveness of the program component being evaluated to achieve the desired objective.

### Fruit and Vegetable Consumption

All surveys for youth in grades 6 and higher and adults assess recent (1-4 weeks) fruit and vegetable intake and have been drawn from nationally validated tools within a wide range of populations. The surveys will be administered before and/or after the period of active program implementation and, if it is a pre-post tool, will request demographic information and other non-identifiable items (middle initial, day, and month of birth) so that surveys can be matched by individual.

- Programs that serve child participants in PreK-2nd grade will use a post-only, parent questionnaire (i.e., MFF Parent Survey) with parents of the child participants.
- Programs that serve child participants in 3rd-5th grade will use a post/retrospective-prequestionnaire with participants (i.e., That's Me, My Choices).
- Programs that serve adolescent participants in 6th-12th grade (age 12-18) will use the 9-item dietary assessment component of the National Youth Risk Behavior Survey (YRBS) developed by the Centers for Disease Control and Prevention<sup>1</sup> (i.e., Fruit and Vegetable Screener for Youth).
- Programs that serve adults (18 years and older) with direct education will use a 6-10 item (6 pre and 10 post) questionnaire adapted from the Food & Physical Activity Questionnaire and Health-Related Quality of Life Measures<sup>2,3</sup> (i.e., Food and Health Questionnaire for Adults).

### Physical Activity

Physical activity (PA) surveys will be administered before and/or after the period of active program intervention and, if it is a pre-post tool, will request demographic information and other non-identifiable items (middle initial, day, and month of birth) so that surveys can be matched by individual.

- Programs that serve child participants in PreK-2nd grade will use a post-only, parent questionnaire (i.e., MFF Parent Survey) with parents of the child participants.
- Programs that serve adolescent participants in 4th-12th grade (ages 9 – 18) will use a screener that is comprised of a combination of questions from the Physical Activity Questionnaire for Older Children (PAQ-C)<sup>4</sup> and Youth Risk Behavior Survey (YRBS)<sup>5</sup> (i.e., Physical Activity Screener for Youth). The combined questionnaire includes the majority of the PAQ-C questions plus three questions from the YRBS pertaining to duration of physical activity and sedentary behavior.

<sup>1</sup> Youth Risk Behavior Surveillance System (YRBSS). (2011). Centers for Disease Control and Prevention, [cdc.gov/yrbss](http://cdc.gov/yrbss).

<sup>2</sup> Murray, E., Auld, G., Baker, S., Barale, K., Franck, K., Khan, T., Palmer-Keenan, D., & Walsh, J. 2017. Methodology for Developing a New EFNEP Food and Physical Activity Behaviors Questionnaire. *J Nutr Educ Behav*, 49, 777-783.

<sup>3</sup> Health Related Quality of Life (HRQOL). 2016. Centers for Disease Control and Prevention. [cdc.gov/hrqol/methods](http://cdc.gov/hrqol/methods).

<sup>4</sup> Kowalski, K., Crocker, P., & Donen, R. (2004 August). The Physical Activity Questionnaire for Older Children (PAQ-C) and Adolescents (PAQ-A) Manual. College of Kinesiology, University of Saskatchewan.

<sup>5</sup> Centers for Disease Control and Prevention. (2013). Youth Risk Behavior Survey. Available at: [cdc.gov/yrbss](http://cdc.gov/yrbss).

- Programs that serve adults (18 years and older) will use the International Physical Activity (PA) Questionnaire<sup>6</sup> (i.e., Physical Activity Screener for Adults). This is a simple 4-question survey that includes questions about moderate and vigorous PA, as well as sedentary behavior.

#### Number of Surveys Required

The number of surveys required to be completed and returned will be determined by MFF based on your proposed reach and detailed in your evaluation plan developed in collaboration with your assigned MFF evaluator. Oversampling might be needed to reach the number of pre- and post-surveys required to be returned to MFF. Overall, by using a statistically sound sampling strategy statewide, programs have less individual evaluation burden.

#### Required Indicators

**Every program** must address, measure, and report on the following indicator for DE:

- MT1. Healthy Eating

**Optional:** Other important indicators are MT2. Food Resource Management; MT3. Physical Activity and Reduced Sedentary Behavior; and additional indicators, as relevant to your programming.

**Have you reviewed and do you understand the requirement for DE outcome evaluation as described above?**

☐ Yes

☐ No

### **3. Process Evaluation**

All programs must collect process evaluation information for both policy, systems, and environmental change initiatives and direct education. Process evaluation information can include educator logs, administration of a process evaluation survey (i.e., Program Evaluation for Adults or Program Evaluation for Youth), tracking which and how many materials were distributed, counting the number of participants reached, and monitoring effectiveness of alternate methods of delivering services and/or barriers to implementing the intervention. Process evaluation for PSE change initiatives include quarterly reports entered in the Map to Healthy Living Update Portal. Process evaluation helps to ensure fidelity (that an evidence-based intervention is delivered as designed and thus likely to result in the expected outcomes) and will be included in your evaluation plan developed in collaboration with your assigned MFF evaluator.

**Have you reviewed and do you understand the requirement for process evaluation as described above?**

☐ Yes

☐ No

### **4. Reach Information**

All programs must collect and report reach information as required by USDA and report it at the end of the program year using forms provided by MFF. Reach information for direct education includes: the total number of unduplicated participants, ethnicity, race, gender, age, mode of delivery, number of series and sessions per series. Reach information for PSE includes: the estimated number of people likely to be impacted by an adopted PSE change.

**Do you agree to create and follow a plan to collect required data?**

☐ Yes

☐ No

<sup>6</sup> The International Physical Activity Questionnaire. (2005). ipaq.ki.se

## SNAP-Ed Assurances

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Signature of Authorized Organization Representative

Date

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Print Name

Title

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Signature of Program Lead

Date

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Print Name

Title

# SNAP-Ed at MFF Evaluation Requirements

Evaluation is an important and required component of SNAP-Ed programs. Effective evaluations are valid, well-planned, and well-executed. Each component of SNAP-Ed programming (e.g., nutrition education, physical activity promotion, PSE strategies, etc.) should have both process and outcome evaluations to measure relevant local feedback on, and ultimate effectiveness of, funded interventions and strategies (refer to page 8 for types of SNAP-Ed evaluation). Implementing interventions and strategies in communities is challenging and sound feedback to inform continuous program improvement is critical to achieving intended outcomes.

## Evaluation Plan

All subrecipients will participate in program evaluation as directed by MFF. You will be assigned an MFF Evaluation Specialist with whom you will collaboratively develop an Evaluation Plan that includes: 1) SMART Objectives, and 2) process and outcome measures for direct education and PSE change strategies. The Evaluation Plan is aligned with local program considerations and statewide metrics for behavioral and PSE outcomes.

## Evaluation Framework

SNAP-Ed program evaluation must align with the [SNAP-Ed Evaluation Framework](#) indicators and outcome measures (refer to page 45) to monitor and evaluate the implementation and effectiveness of interventions and strategies, as well as communicate outcomes to SNAP-Ed stakeholders and funders.

USDA FNS has selected priority indicators:

- MT1: Healthy Eating Behaviors – Individual Level
- MT2: Food Resource Management – Individual Level
- MT3: Physical Activity and Reduced Sedentary Behaviors – Individual Level
- ST7: Organizational Partnerships – Environmental Settings
- MT5: Nutrition Supports Adopted – Environmental Settings
- ST8: Multi-Sector Partnerships and Planning – Sectors of Influence

Additionally, Michigan has included other priority indicators and related outcome measures:

- ST1: Healthy Eating Goals and Intentions – Individual Level
- ST3: Physical Activity and Reduced Sedentary Behaviors Goals and Intentions – Individual Level
- ST5: Needs and Readiness – Environmental Settings
- ST6: Champions – Environmental Settings
- MT6: Physical Activity and Reduced Sedentary Behavior Supports – Environmental Settings
- LT1: Healthy Eating Behaviors Maintained – Individual Level
- LT3: Physical Activity and Reduced Sedentary Behaviors Maintained – Individual Level
- LT5: Nutrition Supports Implementation – Environmental Settings
- LT6: Physical Activity Supports Implementation – Environmental Settings
- R2: Fruits and Vegetables – Population Results
- R7: Physical Activity and Reduced Sedentary Behaviors – Population Results

## Required Evaluation Indicators

- **Every SNAP-Ed at MFF-funded program** must address, measure, and report on the following indicator for DE:
  - *MT1. Healthy Eating*

## SNAP-Ed at MFF Evaluation Requirements

- **Optional:** Other important indicators are *MT2. Food Resource Management*; *MT3. Physical Activity and Reduced Sedentary Behavior*; and additional indicators, as relevant to your programming.
- **Every SNAP-Ed at MFF-funded program** must measure and report on the following indicators for PSE via the M2HL Update Portal, as applicable to their PSE activities: *ST5. Readiness and Need*, *ST6. Champions*, and/or *ST7. Organizational Partnerships*.
- **Returning SNAP-Ed at MFF-funded programs that have completed the PSE Community Exploration process**, or that have completed a needs assessment as part of ST5, must also measure and report on the following, as applicable to their PSE activities:
  - *MT5. Nutrition Supports* and/or *MT6. Physical Activity and Reduced Sedentary Behavior Supports*
  - Whether current and previous fiscal years' MT5 and MT6 adopted changes are being maintained.
- **For returning SNAP-Ed at MFF-funded programs**, the following are additional requirements:
  - If you have implemented SNAP-Ed programming for **at least two (2) full program years**, *ST8: Multi-Sector Partnerships and Planning* reporting is required.
  - If you have adopted any MT5 or MT6 PSE change, you must report *LT5: Nutrition Supports Implementation* or *LT6: Physical Activity Supports Implementation*.

### Evaluation Tools and Data Collection

All subrecipients must administer evaluation instruments to collect data from program participants, in accordance with their evaluation plan and Survey Guide. MFF Evaluation Specialists will analyze and summarize data to share with subrecipients through reports and dashboards. For additional information on guidelines related to evaluation activities, refer to the Evaluation section of the Program Parameters (page 56).

#### Process Evaluation

Process evaluation (scantron or online) is required for DE and PSE change strategies and uses statewide tools when available (e.g., an online Educator Log must be completed after all series have been completed for each intervention used). All DE programs use either the Program Evaluation – Youth or the Program Evaluation – Adults for process evaluation. Protocols are available in the Evaluation section of the Partner Portal for all MFF surveys (process and outcome) and should be followed for consistent data collection.

Measures will determine if program components were implemented as intended (i.e., with fidelity) and capture staff and participant feedback to inform future program improvements. Fidelity Logs for several DE interventions can be found on the Partner Portal in the Evaluation section. These Logs list the elements/components that are critical for program fidelity.

#### Outcome Evaluation

##### *Fruit and Vegetable Consumption*

All surveys assess fruit and vegetable intake and have been nationally validated in a wide range of populations. Surveys that are administered before and after (separate pre and post) the intervention must be matched to assess CHANGE in behaviors. Demographic data such as birth month and year or gender are used to match the pre/post surveys. Therefore, it is crucial that this information be completed if the participant is willing to do so.

- Programs that focus on child participants in PreK-2<sup>nd</sup> grade will use a post-only, parent questionnaire (i.e., MFF Parent Survey) with parents of the child participants.
- Programs that focus on child participants in 3<sup>rd</sup>-5<sup>th</sup> grade will use a post/retrospective pre-questionnaire with participants (i.e., That's Me, My Choices).



## SNAP-Ed at MFF Evaluation Requirements

- Programs that focus on youth participants in 6<sup>th</sup>-12<sup>th</sup> grade (age 12-18 years) will use the 9-item dietary assessment component of the National Youth Risk Behavior Survey (YRBS) developed by the Centers for Disease Control and Prevention<sup>1</sup> (i.e., Fruit and Vegetable Screener for Youth).
- Programs focusing on adults (18 years and older) with direct education will use a 6-10 item (6 pre and 10 post) questionnaire adapted from the Food & Physical Activity Questionnaire and Health-Related Quality of Life Measures<sup>2,3</sup> (i.e., Food and Health Questionnaire for Adults).

### *Health Related Quality of Life*

Health-Related Quality of Life Measures are included in the Food and Health Questionnaire for Adults survey (detailed above) and will be collected at the local level, aggregated by MFF, analyzed by MFF, and reported as statewide data.

### *Physical Activity*

Physical activity surveys will be administered before and after the period of active program intervention and will request demographic information such as birth month and year or gender to facilitate matching of pre-/post-surveys.

- Programs that focus on child participants in PreK-2<sup>nd</sup> grade will use a post-only parent questionnaire (i.e., MFF Parent Survey) with parents of the child participants.
- Programs focusing on physical activity behavior change among participants in grades 4th through 12th (age 9 – 18 years) will use a screener that is comprised of a combination of questions from the Physical Activity Questionnaire for Older Children (PAQ-C)<sup>4</sup> and Youth Risk Behavior Survey (YRBS)<sup>5</sup> (i.e., Physical Activity Screener for Youth). The combined questionnaire includes the majority of the PAQ-C questions plus three questions from the YRBS pertaining to duration of physical activity and sedentary behavior.
- Programs focusing on adults (18 years and older) will use the International Physical Activity (PA) Questionnaire<sup>6</sup> (i.e., Physical Activity Screener for Adults). This is a simple 4-question survey that includes questions about moderate and vigorous PA, as well as sedentary behavior.

### *PSE Change*

Measuring PSE change strategies will include statewide tools to track both progress towards change and actual changes to policies, systems, or the environment at the site, setting, or community level. Subrecipients will collect and report PSE change information and data in the M2HL Update Portal (refer to page 21) throughout the program year. MFF will aggregate and use these data for evaluation and reporting purposes.

### *SMART Objective A*

Each year, subrecipients select one program-specific SMART Objective and provide data that can be analyzed to provide specific information related to effectiveness and appropriateness of programming. This objective is chosen as a team effort among the subrecipient, their MFF Program Manager, and the MFF Evaluation Team. The subrecipient is responsible for collecting the data needed to assess SMART Objective A, as noted on their Evaluation Plan.

### *SNAP-Ed Data Hub*

A data hub is created for each subrecipient, and a unique password is needed to access the information on the hub. Currently, the data hub includes the number of the various surveys used by your organization that have been received by MFF. This allows the local Program Lead to compare the

<sup>1</sup> Centers for Disease Control and Prevention. (2013). Youth Risk Behavior Survey. Available at: [cdc.gov/yrbss](https://cdc.gov/yrbss).

<sup>2</sup> Expanded Food and Nutrition Education Program. (2020). Food & Physical Activity Questionnaire. [nifa.usda.gov/resource/efnep-evaluation-adult-program](https://nifa.usda.gov/resource/efnep-evaluation-adult-program)

<sup>3</sup> Centers for Disease Control and Prevention. (1993). Health-Related Quality of Life Measures. [cdc.gov/hrqol/methods.htm](https://cdc.gov/hrqol/methods.htm).

<sup>4</sup> Kowalski, K., Crocker, P., & Donen, R. (2004 August). The Physical Activity Questionnaire for Older Children (PAQ-C) and Adolescents (PAQ-A) Manual. College of Kinesiology, University of Saskatchewan.

<sup>5</sup> Centers for Disease Control and Prevention. (2013). Youth Risk Behavior Survey. [cdc.gov/yrbss](https://cdc.gov/yrbss).

<sup>6</sup> The International Physical Activity Questionnaire. (2005). [ipaq.ki.se](https://ipaq.ki.se).

## SNAP-Ed at MFF Evaluation Requirements

expected number submitted to the actual number received and conduct appropriate follow-up if necessary. There are plans to build out the data hub to post other reports.

# SNAP-ED EVALUATION FRAMEWORK

## Nutrition, Physical Activity, and Obesity Prevention Indicators



# Program Parameters

## Table of Contents

### Page

<b>Program Parameters Overview .....</b>	<b>47</b>
• Expectations .....	47
• Program Expenses and Activities .....	47
• Using the Program Parameters .....	49
<b>Key Requirements .....</b>	<b>50</b>
• SNAP-Ed Programming .....	50
• Civil Rights Posters – “And Justice for All” .....	51
• Civil Rights Training .....	51
• Credit Statement .....	52
• Nondiscrimination Statement .....	52
• 508 Compliance .....	53
• Multimedia and Property Releases .....	53
<b>SNAP-Ed Program Parameters .....</b>	<b>54</b>
• Community Events .....	54
• Contractor and Fee-for-Service Providers .....	54
• Equipment .....	55
• Evaluation .....	56
• Farmers Markets .....	57
• Food Demonstrations and Food Tastings .....	57
• Gardening .....	58
• Indirect Costs .....	59
• Literature, Audiovisuals, and Other Materials .....	60
• Media Activities .....	61
• Medical Equipment and Health Services .....	61
• Memberships and Subscriptions .....	62
• Nutrition Assistance Promotion .....	62
• Nutrition Education Interventions and PSE Strategies .....	63
• Nutrition Education Reinforcement Items (NERI) .....	64
• Physical Activity Promotion .....	64
• Policy, Systems, and Environmental Change .....	66
• Profits, Revenues, Fundraising, and Grant Writing .....	67
• Retail Locations .....	67
• Social Marketing Campaigns .....	68
• Social Media .....	68
• Space Allocation .....	69
• Time and Effort Reporting and Employment Costs .....	70
• Training, Conferences, and Workshops .....	71
• Travel .....	73
• Volunteers .....	74
• Websites and Domain Names .....	74

# Program Parameters Overview

The Program Parameters section outlines program activities and expenses that are within the scope of SNAP-Ed and therefore likely to support achieving SNAP-Ed goals. As a subrecipient, you are responsible for understanding and following these program parameters to make independent programmatic and financial decisions that 1) comply with Federal, State, and SNAP-Ed guidelines, 2) are aligned with your organization's Program Summary and Budget, and 3) can be reimbursed using SNAP-Ed funding. Implementing programming or making purchases outside of the outlined program parameters may result in reduced or no reimbursement for those activities and/or expenses (refer to page 24 for information about reimbursement).

## Expectations

To assist your organization in making decisions related to SNAP-Ed program activities and expenses, MFF will:

- Inform subrecipients of any updates to Program Parameters and/or SNAP-Ed Guidelines in a timely fashion;
- Provide customized support, training, technical assistance, and monitoring as needed to facilitate independent work and assess subrecipient grant and program management; and
- Answer requests or questions in a timely fashion.

As a SNAP-Ed subrecipient (refer to page 17 for details about subrecipients), you must:

- Review, understand, and adhere to SNAP-Ed Program Parameters and approval processes outlined in this Manual (also at: [snap-ed.michiganfitness.org/programming-operations-manual](https://snap-ed.michiganfitness.org/programming-operations-manual));
- Understand and maintain documentation of "reasonable and necessary" justification of your SNAP-Ed program activities and/or expenses;
- Properly allocate costs to SNAP-Ed using a fair and reasonable justification. See "Program Expenses and Activities" below for more information on allocating costs.
- Align all programming with your organization's most recent, approved version of your Program Summary and Budget; and
- Plan ahead to allow sufficient time for requests to be considered and, when applicable, move through an approval process.

## Program Expenses and Activities

SNAP-Ed is a Federally funded program. This means that the Federal cost principles of **allowable, allocated, reasonable, and necessary** must be followed. Only expenses and activities that meet all Federal cost principles AND are within the scope of your approved Program Summary and Budget can be reimbursed through SNAP-Ed.

### Allowable and Allocated

The SNAP-Ed Program Parameters found on pages 54-75 provide a comprehensive, but not exhaustive, list of allowable and unallowable SNAP-Ed expenses and activities per State and Federal SNAP-Ed guidance. As a subrecipient, it is your responsibility to conduct due diligence using tools and guidance provided by MFF to ensure that your program activities and expenses are **allowable** in SNAP-Ed. In instances when an expense or activity is not clearly or explicitly covered in the Program Parameters, it is also your responsibility as a subrecipient to provide justification supporting the allowability of the expense or activity.

In addition, allowable costs must also be **allocated** appropriately. If an expense or activity is not 100% for SNAP-Ed purposes, only the portion of the cost related to SNAP-Ed (as determined by a fair and reasonable justification) may be charged to SNAP-Ed.

Example:

A Zoom account is purchased for a person whose time is 100% dedicated to SNAP-Ed (i.e., the Zoom account would only be used for SNAP-Ed purposes). The full cost could be charged to SNAP-Ed.

However, if the person splits their time between two programs (e.g., 60% on SNAP-Ed and 40% on Program X) and plans to use Zoom with both programs, the cost needs to be allocated between the two programs. One way to reasonably allocate the cost would be based on the person's time spent on each program. In this case, 60% of the cost would be charged to SNAP-Ed while the remaining 40% would be charged to Program X.

### Reasonable and Necessary

Demonstrating how costs are reasonable and necessary is part of maintaining good stewardship of grant funds. Per Federal Uniform Guidance, not only do costs need to be allowable and allocated appropriately, but they must also be BOTH **reasonable** and **necessary**. Refer to the definition of reasonable and necessary in the Additional Information section.

The following checklist of criteria can help you think through if a program expense or activity is reasonable and necessary. ALL six criteria listed below must be met and each criterion must include sound and succinct (with the most pertinent information only) justification that demonstrates it is met.

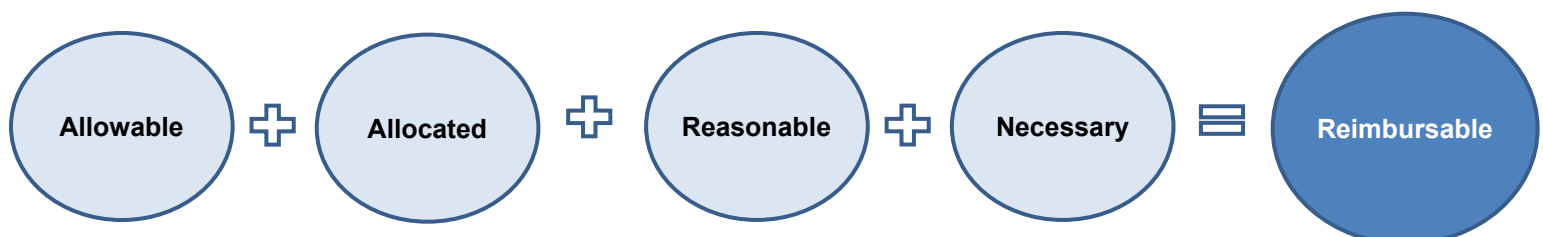
#### Reasonable

- ☐ Cost is in line with the anticipated benefit to the program (i.e., the potential benefit to the program is worth or outweighs the cost).
- ☐ Cost for the program expense or activity is justified by anticipated reach, function, and/or frequency of use.
- ☐ Cost is in line with other comparable goods or services and conforms with any organizational procurement policy.

#### Necessary

- ☐ Cost is needed for expenses or activities essential to program or administrative functions.
- ☐ If the cost is NOT incurred, programming and/or program operations would be negatively impacted.
- ☐ Cost is not for a duplicate of existing inventory and/or community efforts.

Determining if a program expense or activity is reasonable and necessary requires an intentional thought process. The checklist above is a tool to help guide you through that process; however, completing the checklist is not an automatic guarantee that an expense or activity meets all required criteria. Meeting the criteria for reasonable and necessary depends on the strength of the justification and is situational (i.e., something may be reasonable and necessary in one instance but not in another). You must consider the context as part of the thought process.





Be prepared to keep on record and present clear written documentation of the justification that an expense or activity is allowable, allocated appropriately, reasonable, and necessary. This may be requested when a cost is questioned and/or as part of monitoring and audit activities conducted by MFF, MDHHS, and/or USDA FNS.

Use the tips below to help you document that an expense or activity is allowable, allocable, reasonable, and necessary:

- ☐ Clearly document that the expense/activity meets **all** the reasonable and necessary criteria provided above before making the purchase.
  - Beyond checking the boxes in the checklist, provide a brief, to-the-point description of how each criterion is met for the expense/activity.
- ☐ Document whether the expense/activity will be 100% SNAP-Ed or only a portion. If it is only a portion, allocate the portion for SNAP-Ed and include your reasoning, in brief.
- ☐ Keep the documentation with other supporting documents related to the expense/activity and be prepared to provide written justification, if requested.

### Using the Program Parameters

The Program Parameters are organized first by Key Requirements and then by topic (alphabetical).

**KEY REQUIREMENTS** section highlights important USDA FNS, MDHHS, and/or MFF guidelines and requirements that apply to ALL aspects of your SNAP-Ed program. This section should be referenced FIRST when you begin SNAP-Ed program planning and implementation and when determining if activities and expenses will meet criteria for reimbursement.

Each topic includes the following, as applicable:

- **REQUIREMENTS:** These are things you must do when considering purchases and implementing SNAP-Ed activities in order to be reimbursed for them.
- **ALLOWABLES:** These are activities and expenses that can be reimbursed or used if they:
  - Meet SNAP-Ed guidelines and criteria for allowability and reasonable and necessary; and
  - Are included in the Program Summary and Budget included with your contract.
- **UNALLOWABLES:** These are activities and expenses that are not allowable under MFF's SNAP-Ed guidelines and do not meet criteria for allowability and reasonable and necessary. These expenses cannot be reimbursed with SNAP-Ed funding.

***Program Parameters are aligned with the current FY 2024 USDA SNAP-Ed Guidance.***

# Key Requirements

## SNAP-Ed Programming

*The list of requirements below applies to all direct nutrition education, PSE change efforts, and physical activity promotion activities, resources, and other elements included as part of your SNAP-Ed program.*

### **REQUIREMENTS:**

- You must notify MFF of any substantive changes to your programming, including changes to nutrition education lessons and curricula, delivery methods, or settings. Changes must be approved by MFF prior to implementation.
- Direct education must have an intensity and duration that supports behavior change and allows for active engagement in-person, in a live online format, or through interactive media. For virtual programming, you are still responsible for collecting demographic information, establishing protocols, and measuring behavior change.
- All educational materials, resources, and activities must focus on nutrition education, physical activity promotion, and/or PSE changes that align with healthy eating habits and physically active lifestyles; and must:
  - Be produced for SNAP-Ed eligible audiences and delivered at qualifying locations, as detailed in the Program Summary and Budget included with your contract;
  - Be culturally appropriate; and
  - Have the associated expense(s) allocated, if not used 100% for SNAP-Ed.
- Scope and sequence outlines for each DE intervention and PSE strategy must include MFF required components and be submitted to MFF (refer to page 18) prior to the start of implementation.
  - Identify any modification being made to the intervention, including any adjustments needed to deliver your DE and/or PSE intervention online.
- Any videos produced to align with SNAP-Ed allowable nutrition education and physical activity promotion must be:
  - Included in your scope and sequence and submitted to MFF for approval prior to recording.
  - Produced following the best-practices and submitted for review using MFF submission guidelines (available at [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfkw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfkw7dcuc5)) before MFF uploads them to the [Online Learning in a SNAP](#) YouTube channel.
- When operating in conjunction with existing programs, SNAP-Ed program activities are required to enhance and/or supplement, not supplant them. For example, the cost for a classroom teacher paid outside their contract time to conduct an extracurricular cooking club for low-income teenagers may be allowable. Using SNAP-Ed funds to replace personnel costs of state-funded school class time, however, is not allowable.
- Programs cannot charge for SNAP-Ed services.

### **UNALLOWABLE COSTS:**

- 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 SNAP-Ed activities.
- Education for incarcerated or institutionalized persons not eligible for SNAP (e.g., people in jails, prisons, nursing homes, mental institutions, etc.).
- Program activities, resources, or materials:
  - 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. Any brand names, products, and

- clearly identifiable logos, even when included in evidence-based intervention materials, must be blurred or otherwise obscured;
- Containing negative written, visual, verbal expressions about specific foods, beverages, products, commodities, products, or retail stores, including resources labeling specific foods as “junk food”;
  - Including subject matter outside the scope of SNAP-Ed;
  - Containing personal diet plan information, including weight control/loss or special diet plans;
  - Disparaging a person’s individual attributes, especially body size;
  - Addressing the psychological issues of “body image diseases” (e.g., anorexia or bulimia);
  - Addressing the subject of basic anatomy and physiology;
  - Addressing screening, treating, or managing diseases;
  - Providing secondary disease prevention intervention information (e.g., cookbooks for people with diabetes or disease/disorder books providing coping tips or suggestions);
  - Premised on using SNAP-Ed funds to pay for manufacturer or store (cents off) coupons; and
  - Influencing a store’s pricing policy.

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### Civil Rights Posters – “And Justice for All”

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#### **REQUIREMENTS:**

- All SNAP-Ed programs must have the most current version available of the “And Justice for All” poster visible to participants during each SNAP-Ed program activity. This includes virtual programming that is live or recorded.
- MFF has printed and digital posters available, upon request.

#### **ALLOWABLE COSTS:**

- “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.

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*For all online program activities, whether live or pre-recorded, the “And Justice for All” poster must be posted in the background and visible to participants or displayed on a slide at the end of a recording. For more information about online requirements and examples, visit [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7ikngcfkw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7ikngcfkw7dcuc5).*

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#### **UNALLOWABLE COSTS:**

- “And Justice for All” posters should not be displayed in common areas of a SNAP-Ed program site unless programming is conducted in those common areas.

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### Civil Rights Training

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#### **REQUIREMENTS:**

- Civil Rights training is required each new program 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:
  - Complete the self-paced, read-along training provided by MFF; and
  - Submit the Civil Rights Training Confirmation Form online.
- Civil Rights training must be completed by October 31 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](https://snap-ed.michiganfitness.org/civil-rights).

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## Credit Statement

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**REQUIREMENTS:**

All literature, materials, and audiovisuals distributed to program participants and all media communications (including media releases, interviews, electronic media, etc.) must include the following credit statement when produced or reproduced using SNAP-Ed funds:

**“This project was funded in whole or in part by the USDA’s Supplemental Nutrition Assistance Program Education through the Michigan Department of Health and Human Services and the Michigan Fitness Foundation.”**

For more information about online programming and social media requirements and examples, visit [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfkw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfkw7dcuc5).

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*Do not add USDA and SNAP logos to newly created or reprinted materials. These logos have specific requirements that must be followed when used. See USDA SNAP-Ed Guidance for details.*

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## Nondiscrimination Statement

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The nondiscrimination statement lists all of the prohibited bases for discrimination contained in the USDA Civil Rights Policy Statement. Materials that must have the nondiscrimination statement include print (e.g., brochures, newsletters, education curricula, etc.) and non-print (e.g., audio, videos, websites, etc.) forms of communication.

The minimum font size for nondiscrimination statements for brochures is 8 point. For all other printed materials and web pages, the statement must be legible. Failing to use the USDA Nondiscrimination Statement could result in items not being eligible for reimbursement.

The full nondiscrimination statement is rarely, if ever, required for SNAP-Ed. It is only necessary to include the full nondiscrimination statement if SNAP or other FNS program eligibility or application information is provided. Refer to page 78-79 in the Additional Information section for details on the full statement.

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*All materials developed, adapted, or printed with SNAP-Ed funds that are shared in public must include, in a reasonably-sized font, the shortened USDA nondiscrimination statement: “This institution is an equal opportunity provider.”*

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*Please refer to [fns.usda.gov/cr/fns-nondiscrimination-statement](https://fns.usda.gov/cr/fns-nondiscrimination-statement) for more information on translated statements.*

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If an agency has additional wording or information to be included, it must be added after the USDA nondiscrimination statement; the added information must be separated and not included within the USDA paragraphs or wording.

For more information about online programming and social media requirements and examples, visit [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfkw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfkw7dcuc5).

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## 508 Compliance

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*Do not add USDA and SNAP logos to newly created or reprinted materials. These logos have specific requirements that must be followed when used. See USDA SNAP-Ed Guidance for details.*

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According to USDA SNAP-Ed Guidance, all communication must comply with Section 508 (meet accessibility standards) and all applicable civil rights laws, regulations, Executive Orders, and policies (see [section508.gov/training/](https://section508.gov/training/) for relevant information).

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## Multimedia and Private Property Releases

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### **REQUIREMENTS:**

- To protect privacy, particularly in regard to minors, photographs, video, or audio recordings that are to be made public must have a release completed for each person who is captured and recognizable in photographs or video/audio recordings.
- Parents or guardians must sign the multimedia release prior to their children being photographed or captured on video or audio.
  - Many schools have releases signed by parents at the beginning of the school year and this release may be sufficient for your needs.
- If it is known ahead of time that photos, video, or audio recordings will take place (e.g., during a nutrition-based class for children), multimedia releases can be completed at the beginning of the class or program year.
- For additional legal protection, we recommend that organizations obtain a property release from the property owner if photographs, video, or audio recordings are to be captured on private property.
- Subrecipients can follow their own policies for photos or video/audio recordings that are to be used only for internal purposes.
- A sample Multimedia Release and Property Release can be found at [snap-ed.michiganfitness.org/forms](https://snap-ed.michiganfitness.org/forms).

# SNAP-Ed Program Parameters

## In alphabetical order by topic

*In addition to the requirements and allowables/unallowables listed below, refer to and follow the guidelines outlined in Key Requirements (pages 50 – 53).*

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### Community Events

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*Community events refer to and include any event(s) such as school-based events, health fairs, community forums, events at retailers or pantries, etc. that engage families or the broader community where SNAP-Ed is taking place.*

#### **REQUIREMENTS:**

- Participation in nutrition education or physical activity promotion events, classes, and community events must:
  - Focus on SNAP-Ed program activities and engage SNAP-eligible audiences identified in the Program Summary and Budget included with your contract.
- School-based events must engage families/caregivers.
- Use the Community-Based Events and Parent Engagement Activities form found at [snap-ed.michiganfitness.org/forms](https://snap-ed.michiganfitness.org/forms) to determine if an event is reasonable and necessary to support your core SNAP-Ed programming.

#### **ALLOWABLE COSTS:**

- Structured, interactive nutrition education and physical activity promotion with SNAP-eligibles in SNAP-Ed allowable locations and PSE support activities that support your DE programming.

#### **UNALLOWABLE COSTS:**

- Events of a celebratory nature that will not likely to reach SNAP-eligible families and/or do not include nutrition education/SNAP-Ed messages.

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### Contractor and Fee-for Service Providers

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#### **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 program activities identified in the Program Summary and Budget included with your contract;
- 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
- You must follow your organization's procurement policies. Following Federal Uniform Guidance, a quote must be obtained from an adequate number of sources (more than one) 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 COSTS:**

- 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 memorandum 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 memorandum from the school or employer confirming the work being done is above and beyond the normal time and pay on the contract.

### **UNALLOWABLE COSTS:**

- Subcontracting your SNAP-Ed contract or portion of your contract to other parties without obtaining prior written approval from MFF;
- 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 is defined in your SNAP-Ed proposal and budget.

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## Equipment

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*Equipment is defined as anything that plugs in or is re-charged by plugging in. All equipment costing \$5,000 or more is defined as "capital equipment."*

### **REQUIREMENTS:**

- All equipment must be reasonable and necessary and integral in the delivery of your SNAP-Ed program.
- All non-capital equipment (e.g., 'small kitchen equipment for food tastings') must be identified in the budget included in your contract and be purchased by June 30<sup>th</sup> of the contract year.
- If the equipment is also being used to support activities outside of SNAP-Ed or is being used by a staff person who is not 100% SNAP-Ed, the cost must be allocated across programs. This includes computers, printers, laptop batteries, etc.
- Equipment purchased with SNAP-Ed funds must be returned at the request of MFF if the program is terminated or the subrecipient no longer participates in SNAP-Ed.
- All equipment (as defined above) purchased with SNAP-Ed funds must be logged into an Equipment Inventory and submitted to MFF with the Year-End Report.
- All capital equipment costing \$5,000 or more must be pre-approved in writing by MFF, even if it is approved in the budget included with your contract.

### **ALLOWABLE COSTS:**

- Purchase of reasonable and necessary electronic equipment (such as computers, TV, DVD player, cameras, etc.) that costs \$4,999 or less if listed as "electronic equipment to deliver SNAP-Ed programming" in the budget included with your contract.
- Electronic equipment purchased for someone not working 100% on SNAP-Ed must be allocated based on the person's percent dedication to SNAP-Ed.
- Purchase of small non-commercial-grade cooking or food demonstration equipment and dishes necessary for food preparation, demonstration, and food storage, if identified in the budget included with your contract, as "small kitchen equipment and storage for food tastings".
- Cell phones purchased for staff who work predominantly in the field, or away from a desk location with a land line, with written pre-approval by MFF and FNS before purchase.
  - Cell phone purchases should be limited, and efforts to share cell phones among staff only as needed for remote work are encouraged.

- Tablets/iPads to be used for program delivery purposes, such as delivering nutrition education or collecting data for evaluation, with written preapproval by MFF and FNS before purchase.
  - Tablets/iPads must be shared with all staff that work remotely in the field.
  - Tablets/iPads usage should have a tracking system in place. Devices should be:
    - Checked out and returned according to existing organization policies; and
    - Include reasonable security measures if participant information is collected.
  - A one-time purchase of a Wi-Fi hotspot to support tablet/iPad function may be allowable provided the hotspot is reasonable and necessary for the delivery of SNAP-Ed programs and interventions.

### **UNALLOWABLE COSTS:**

- Purchase of food service equipment for food service use;
- Medical equipment;
- Cell phones and/or tablets/iPads purchased without pre-approval from MFF and FNS;
- Purchases of tablets/iPads for purposes other than program delivery or data collection for evaluation; and
- Walkie talkies and/or handheld two-way radios.

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## Evaluation

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### **REQUIREMENTS:**

- Implement the Evaluation Plan (Objectives) and related Survey Guide provided by MFF (Note: MFF will analyze and summarize data and provide each local organization with reports to use for continuous improvement.
- Follow MFF-established data collection protocols. Protocols for administering all MFF surveys are provided in the Evaluation section of the Partner Portal.
- Dedicate staff time and effort to evaluation activities (e.g., educator training regarding survey protocols, survey administration, and barcoding). 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. Do not include personnel expenses associated with evaluation activities as 'Program Expenses'.
  - Local SNAP-Ed Program Leads are responsible for overseeing implementation of program evaluation (Evaluation Plan and Survey Guide); working with the MFF Program Manager and/or Evaluation Specialist on evaluation activities; and the application of findings and results, etc.
  - 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 Program Summary and Budget included with your contract.

To learn more about evaluation requirements, refer to the SNAP-Ed at MFF Evaluation Requirements section (page 41).

### **ALLOWABLE COSTS:**

- Evaluation activities that correspond to approved SNAP-Ed program activities;
- Needs assessment/evaluations of minimal or no cost that directly contributes to SNAP-Ed program planning and are identified in the Program Summary and Budget included with your contract; 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. If reimbursement is given in the form of a gift card, the reimbursing organization should issue gifts cards restricted from alcohol, tobacco and gambling purchases.

### **UNALLOWABLE COSTS:**

- Payment to subjects for their participation in research/evaluation studies;
- Incentive items or payments to encourage attendance at focus groups or evaluations;
- Research that does not target SNAP eligible populations;
- 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.
- Staff time at the local level should not be used to enter or analyze outcome survey data for direct education since that service is provided by the MFF.

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## Farmers Markets

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Farmers Markets offer multiple opportunities to partner with SNAP-Ed providers. States have the flexibility to implement PSE change 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 nutrition education 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. Rather, 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.

### **UNALLOWABLE COSTS:**

- Operation of any food assistance benefit machine (e.g., running EBT, DUFB, etc.); and
- License or permit fees for farmers markets.

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## Food Demonstrations and Food Tastings

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*Food demonstrations and food tastings support a nutrition lesson or activity promoting healthy eating behaviors. When planning for food demonstrations and tastings, choose ones that align with your SNAP-Ed direct education and PSE interventions and activities.*

Refer to page 82 in the Additional Information section for additional recommendations on selecting recipes and determining tasting sizes.

### **REQUIREMENTS:**

- All staff who provide food tastings or cooking demonstrations must be supervised by a staff member who is certified as a ServSafe Food Manager. The ServSafe certified staff must ensure those who are conducting food tastings or demonstrations comply with all state and local food laws and safety standards.
- Local health department guidelines for conducting community food tastings must be followed. Programs must verify if they are required to have certification (in addition to ServSafe) or licensure to conduct food demonstrations at their site(s).
- Food tastings and cooking demonstrations must support a nutrition education activity and/or lesson from evidence-based interventions or PSE strategies; and include a SNAP-Ed allowable nutrition education message.
- Food tastings must provide only a **small taste**, not an entire snack, meal, or serving. The SNAP-Ed Guidance describes a food tasting as “¼ - ½ of a serving.” Refer to page 83 in the Additional Information section for more information on tasting size guidelines.

### **ALLOWABLE COSTS:**

- Food for demonstration and tasting purposes that support SNAP-Ed programming as outlined in the Program Summary and Budget included with your contract;
- Non-commercial grade small kitchen equipment, serving ware, and food storage items for preparation and demonstration purposes if identified in your budget included with your contract, as “small kitchen equipment for food tastings”;
- Staff time to prepare, serve, and clean up for food 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 COSTS:**

- Snacks or food service;
- Meal size portions or complete meal service, including any sample recipes created for the purpose of training staff on preparation and serving (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 for program recruitment or as incentives (e.g., for attending nutrition education classes, completing evaluations, etc.);
- Use of SNAP-Ed 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.

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## Gardening

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Food-based gardening is a beneficial activity that leads to the economical production and consumption of healthy and fresh food. FNS encourages PSE initiatives that create sustainable food gardens focused in eligible places. Gardening projects are not meant to create gardens with the primary purpose of donating food; however, initiatives that benefit eligible schools and communities through collaborative efforts are allowed.

SNAP-Ed providers can play an instrumental role in community food gardening working with low-income populations. Volunteer time for food garden maintenance is an example of an opportunity for community participation and collaborative partnerships to support efforts beyond SNAP-Ed funding. Ideally, gardening costs should be shared in partnership with other organizations and funding mechanisms to ensure sustainability of the project.

### **REQUIREMENTS:**

- All efforts should be taken to establish community garden sites in areas where they are easily accessible for SNAP-Ed eligible individuals. If a garden is not directly serving SNAP-Ed eligible individuals at the site, then the produce grown must be distributed at a partner site serving low-income individuals and families.
- All SNAP-Ed garden activities are required to include evidence-based nutrition education at the gardening site or point of distribution and must be approved in your SNAP-Ed program scope of work. This can include indirect education channels, but direct education is recommended. Nutrition education should be related to the produce being grown from the garden, and inclusion of information about gardening and health is recommended.

### **ALLOWABLE COSTS:**

- Educational supplies, curricula, and staff salaries to teach food gardening concepts as part of an evidence-based nutrition education curriculum/lesson reinforcing the beneficial nutrition and physical activity aspects of food gardening;
- Point-of-decision signage and other behavioral cues to action that promote healthy eating or physical activity choices in the garden; and
- Seeds, **edible plants (including edible pollinator plants)**, small gardening tools, supplies such as fertilizer and potting soil, and other supplies needed to reinforce nutrition messages being taught through gardening if gardening-based curricula and/or PSE activities are identified in your Program Summary and Budget included with your contract as “gardening supplies for ‘ABC’ curriculum/PSE activities.”

### **UNALLOWABLE COSTS:**

- The rental or purchase of garden equipment (including rototillers, tractors, etc.);
- The purchase or rental of land for garden plots;
- **Non-edible plants;**
- All costs associated with staff time to maintain gardens; and
- Botany and horticulture discussions, if not tied to a specific, evidence-based nutrition education lesson or curriculum.

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## Indirect Costs

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*Allowability of administrative costs is governed by 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.*

### **REQUIREMENTS:**

- All administrative expenses will be evaluated within the context of the proposed SNAP-Ed programming and must be reasonable, necessary, and properly documented and allocated.

### **ALLOWABLE COSTS:**

- A Federal indirect cost rate can be applied to the grant application if substantiated with a Federally negotiated indirect cost rate agreement (NICRA) or Michigan Department of Education rate.
  - If your indirect cost rate is not a percentage of your modified total direct expenditures but is applied only to certain portions of your budget (e.g., 10% applied only to salary and fringe), you must submit the justification for that calculation.
- A 10% de minimis indirect cost rate can be applied to a grant application if your organization currently does not have a Federal indirect rate, if substantiated with a de minimis certification.

- 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 allocated and submitted for reimbursement under “administrative/space/miscellaneous” expenses. You must submit the justification and method of allocation for these expenses.

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### Literature, Audiovisuals, and Other Materials

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*This section covers literature, audiovisuals, and other materials needed to implement SNAP-Ed direct education, physical activity promotion, and PSE change strategies, such as participant handouts, newsletters, presentations, recruitment flyers, recipe cards, etc.*

#### **REQUIREMENTS:**

- Existing materials and resources must be used whenever possible, including those produced by USDA, such as *MyPlate* handouts or other evidence-based resources such as *MI Harvest of the Month*™ recipes.
- Materials must be detailed in the Program Summary and Budget included with your contract.
- Newly created materials such as newsletters and participant handouts must:
  - not duplicate existing resource; and
  - be pre-approved by MFF.
- All literature, audiovisuals, and other materials (including recruitment materials) distributed to program participants must include the appropriate USDA nondiscrimination statement and credit statement when produced or reproduced using SNAP-Ed funds.
- Any children’s books used to support nutrition education must be pre-approved. MFF created a Book List to make it easy to find books that are already approved for SNAP-Ed in Michigan.
  - The Book List is divided into two categories for use in SNAP-Ed programming: 1) books fully approved and 2) books needing pre-approved reader notes. Visit [snap-ed.michiganfitness.org/book-lists](https://snap-ed.michiganfitness.org/book-lists) for the most up-to-date list and additional information about the Book List, required messaging, and approvals.

#### **ALLOWABLE COSTS:**

- The purchase of USDA FNS nutrition education and physical activity promotion materials (posters, fact sheets, supplemental materials, etc.) addressing SNAP-Ed topics for use with SNAP-eligibles;
  - Other nutrition education materials may be utilized when there are no FNS or Center for Nutrition Policy and Promotion materials available.
- The purchase of children’s books from the SNAP-Ed at MFF approved book list; and
- Materials that align with SNAP-Ed program parameters and are required to deliver a lesson or activity as part of the evidence-based interventions identified in the Program Summary and Budget included with your contract.

#### **UNALLOWABLE COSTS:**

- Office supplies;
- Literature, audiovisuals, and other materials developed with SNAP-Ed funds that do not include the required nondiscrimination and credit statement.
- Children’s books that are not on the SNAP-Ed at MFF approved book list [snap-ed.michiganfitness.org/book-lists](https://snap-ed.michiganfitness.org/book-lists) unless pre-approved by MFF.
- A bulk purchase of a children’s book on the SNAP-Ed approved book list without pre-approval; and
- Water bottles, pedometers, and heart rate monitors.



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## Media Activities

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*Media activities are traditional or digital mass media communications, such as articles, public service announcements, letters to the editor, opinion editorials, interviews, press releases, press conferences, speaking engagements, etc. that are delivered via television, radio, newspapers, billboards, transit (vehicle wraps) and other outdoor advertising, social media, email, websites, blogs, or internet-based radio and television.*

### **REQUIREMENTS:**

- All media activities, including development and distribution, must:
  - Be reasonable and necessary and pre-approved by MFF, even if they were identified in your Program Summary and/or Budget included with your contract;
  - Include the credit statement (page 52);
  - Be coordinated with and complementary to SNAP-Ed at MFF communications as applicable; and
  - Have final copy approved by MFF, as applicable.
- Ensure MFF has sufficient lead time to process your request, especially in the event additional approval is required from MDHHS and/or USDA. Include your concept, timeline, and proposed distribution channels with your request.
- If your media activities include an image or video, you must have a release form on file to use that image or video (refer to page 53 for information about multimedia releases).
- All media costs and activities must focus on SNAP-eligible households in qualified census tracts or other eligible locations.
- Refer to the Social Media section in Program Parameters (page 68) for additional information.

### **ALLOWABLE COSTS:**

- Media created for SNAP-Ed audiences focused on healthy eating and physical activity, and pre-approved by MFF. Examples of media include:
  - Paid or public service radio and television commercials, interviews, and/or media appearances;
  - Electronic media (e.g., YouTube, Facebook Live, Podcasts, etc.); and
  - The preparation of press releases and press kits, spokesperson training.

### **UNALLOWABLE COSTS:**

- 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 that 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.

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## Medical Equipment and Health Services

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### **ALLOWABLE COSTS:**

- 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 align with program activities identified in your Program Summary and Budget included with your contract; 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 establish and maintain active lifestyles and healthy eating habits, as approved in the Program Summary and Budget included with your contract.

### **UNALLOWABLE COSTS:**

- 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 budget included with your contract, approval by MFF must be gained prior to purchase.);
- Any costs (time and 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.

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## Memberships and Subscriptions

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### **ALLOWABLE COSTS:**

- Institutional memberships in business, technical, and professional organizations consistent with your SNAP-Ed program activities and the effort to promote quality nutrition services to SNAP-Ed eligible people that were approved in your budget included with your contract; and
- Organizational subscriptions to professional publications that are consistent with your SNAP-Ed program activities and the effort to promote quality nutrition services to SNAP-Ed eligibles that were approved in the budget included with your contract.

### **UNALLOWABLE COSTS:**

- Any memberships or subscriptions not approved in the budget included with your contract;
- 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.

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## Nutrition Assistance Promotion

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### **ALLOWABLE COSTS:**

- 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;
- Communicating factual information pertaining to SNAP;

- Basic SNAP information or a link to SNAP information may be placed on handouts, brochures, recipes, etc. only; and
- Partnerships with local food assistance agencies and organizations, including local SNAP offices, to facilitate reciprocal referrals to increase food access and resource benefits, especially those that include fruits and vegetables.

### **UNALLOWABLE COSTS:**

- Any activity with the primary objective of SNAP Outreach, including enrollment, to increase participation in SNAP.
- 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.

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## Nutrition Education Interventions and PSE Strategies

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### **REQUIREMENTS:**

- All curricula, interventions, or PSE strategies must be evidence-based and detailed in your Program Summary and Budget included with your contract.
- Existing SNAP-Ed curricula or interventions must be used whenever possible, including USDA curricula such as *Eat Smart, Live Strong, Grow It, Try It, Like It*, or other existing or emerging curricula.
- Development of curricula, new lessons, or interventions is unallowable. If you create new curricula or lessons, you will not be reimbursed for your time, supplies, or any other associated costs.

### **ALLOWABLE COSTS:**

- The purchase of or printing costs associated with evidence-based curricula or strategies included in the Program Summary and Budget included in your contract.

### **UNALLOWABLE COSTS:**

- Any intervention that duplicates efforts of similar SNAP-Ed programming and/or USDA-funded programming;
- Classes or activities 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 not integrated with SNAP-Ed allowable nutrition education;
- Exercise classes, equipment, and facilities;
- Weight loss classes, individualized meal plans, obesity treatment programs, etc.; and
- Nutrition education or PSE change costs that are charged to another Federal program (e.g., Team Nutrition, WIC, EFNEP, Head Start, etc.).

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### Nutrition Education Reinforcement Items (NERI)

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NERI refer to products provided to the SNAP-Ed audience or those closely associated with SNAP-Ed and are meant to reinforce the objectives of the education provided to the participants. These items must have a direct relationship to the desired nutrition or physical activity behavior change, and are not meant to be provided just as an incentive.

#### **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 program activities to support the sustainability of the desired behavior change. NERI must also be aligned with specific lessons within an intervention.
  - There should be an intentional, direct connection between the NERI and the education message(s) being promoted. This must be outlined in your NERI order form; and
  - NERI cannot be distributed at every lesson. Rather, one or two NERI can be distributed to participants at different times across a series of classes/events or SNAP-Ed related activities.
- NERI designed for physical activity promotion (e.g., Flip ‘n Fling, strength band, etc.) must be provided in conjunction with a relevant nutrition education and physical activity promotion.
- 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 the Program Summary and Budget included with your contract.
  - NERI must cost \$5 or less per item (including message imprinting; excluding shipping and handling);
  - If the NERI is a physical activity promotion item (e.g., jump rope, resistance band, etc.) there must be a nutrition education, 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); and
  - The nutrition education message must be pre-approved by MFF.

#### **ALLOWABLE COSTS:**

- NERI provided by MFF. NERI can be ordered from the SNAP-Ed at MFF website at [snap-ed.michiganfitness.org/neri](https://snap-ed.michiganfitness.org/neri).

#### **UNALLOWABLE COSTS:**

- Any NERI purchased that has not been pre-approved in writing by MFF staff, even if it was written into the Program Summary and Budget included with your contract.
- **T-shirts as NERI.**
- NERI used as incentives or for program recruitment.

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### Physical Activity Promotion

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#### **REQUIREMENTS:**

- All physical activity (PA) promotion activities must be within the context of nutrition education.

- Education and program materials to promote and reinforce physical activity should include messages that link nutrition and physical activity and explain the associated health benefits of active lifestyles.
- PA promotion activities must use existing materials whenever they are available.
- PA demonstrations must be instructional in nature and conducted on a one-time-only basis for SNAP-Ed eligible people.
- If PA promotion includes regularly scheduled demonstrations of a 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 COSTS:**

- PA messages and PA recommendations contained in the most current [\*Dietary Guidelines for Americans\*](#) and [\*Physical Activity Guidelines for Americans\*](#).
- Providing information about low-cost and no-cost physical activities to encourage program participants to engage in regular PA:
  - Resource lists that include community locations where SNAP-eligibles can access low or no-cost activities;
  - Physical activity bulletin boards or displays in nutrition assistance offices, clinics, or other community locations where SNAP-eligibles congregate; and
  - Collaborative efforts with community partners to promote PA.
- 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.
- Educational materials to promote PA that are purchased from reliable authorities, if identified in the Program Summary and Budget included with your contract as “PA promotion education materials”.
- PSE change strategies that promote and support physical activity are allowable. Examples include:
  - Time and effort to help partner groups organize and plan walking trails; and
  - Promoting a walking trail and the benefits of physical activity to address weight management and facilitate the adoption of physical activity behaviors.
- Promotion of Walk to School Day and other events aligned with your PSE program activities identified in your Program Summary and Budget included with your contract.
- Community assessments with a focus on the physical activity environment that are directly related to SNAP-Ed DE and PSE program activities.

### **UNALLOWABLE COSTS:**

- Ongoing exercise or PA classes with the same people (e.g., yoga classes, fitness classes, walking clubs, sports teams, running classes, gym classes).
- Implementation of structural environmental improvements (e.g., walking path) 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.
- Water, sport drinks, or other beverages given to participants during PA promotion demonstrations.
- Water bottles, pedometers, and heart rate monitors.

## Policy, Systems, and Environmental Change

### **REQUIREMENTS:**

- Subrecipients participating in PSE change activities:
  - Shall not exclusively lead PSE efforts; rather, partnerships and collaborations are necessary to fully implement PSE change strategies (refer to page 7 in the SNAP-Ed Overview section for examples);
  - 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;
  - Must consider the cultural needs of the populations served and consider local relevant existing partnerships and collaborations to develop solutions to bring healthy foods and opportunities for physical activity to the community; and
  - Must be aware of and work to address 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.
- Refer to the Nutrition Education Interventions and PSE Strategies section on page 63 for additional information.

### **ALLOWABLE COSTS:**

- Costs associated with providing consultation and technical assistance to organizations in creating appropriate PSE changes that benefit SNAP-Ed eligible people 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, 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). A conversation with your MFF Program Manager is required prior to purchase.
- Consultation with organizations representing a variety of sectors such as food industry, government, public health and health care and education on increasing access to and promotion of whole healthy eating with a focus on fruits and vegetables and physical activity;
- Conducting scans or assessments of the food or physical activity policies, systems, or environments;
- Analyzing and preparing data reports and sharing information on the expected benefits of PSE changes;
- 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 PSE 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:**

- Costs associated with establishing and maintaining 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;
- Financial incentives to community partners or retailers to support environmental or policy changes; and
- Salaries for retail store staff, farmers market managers, or food service workers for service operations.

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## Profits, Revenues, Fundraising, and Grant Writing

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### **REQUIREMENTS:**

- Any sales of SNAP-Ed publications, materials, etc. received by a subrecipient 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 COSTS:**

- 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 COSTS:**

- Sale of publication/materials produced with USDA dollars to make a profit (the generation of program revenue over the cost of goods);
- Time, effort, and other resources to support grant writing; and
- Fundraising 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.

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## Retail Locations

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### **REQUIREMENTS:**

- SNAP-Ed services that take place in partnership with retailers may only do so at retail sites (grocers, markets, restaurants) that accept WIC and/or SNAP benefits **and** demonstrate significant patronage (or likelihood of significant patronage) by low-income individuals and families (e.g., retail sites located in census tracts where at least 50% of persons have gross incomes that are equal to or less than 185% of the Federal poverty threshold).
- Talk with your MFF Program Manager about other potential sites that do not fit or meet the above requirements.

### **ALLOWABLE COSTS:**

- PSE change interventions and strategies in retail setting such as supermarkets, small chain stores, and independent (neighborhood) markets in qualifying areas designed to increase the purchase of fruits and vegetables among SNAP-Ed eligible people; and
- Cooking/food demonstrations, food tastings, store tours, and retail-sponsored community events conducted to support nutrition education lessons at qualifying sites.

### **UNALLOWABLE COSTS:**

- Partnerships with establishments that do not accept WIC or SNAP benefits and demonstrate significant patronage by low-income individuals and families; and
- Retail site activities not focused on SNAP-Ed target audiences.

## Social Marketing Campaigns

*MFF develops and implements statewide social marketing campaigns on behalf of all subrecipients. The current MFF social marketing campaign can be found at [healthychoicescatchon.org](https://healthychoicescatchon.org).*

### **REQUIREMENTS:**

- Use of the MFF social marketing campaign digital and “on the ground” materials is encouraged. Materials can be requested through MFF.

### **ALLOWABLE COSTS:**

- N/A

### **UNALLOWABLE COSTS:**

- Developing social marketing campaigns or using social marketing materials not provided by MFF.

## Social Media

*This information applies to all social media platforms (e.g., Facebook, Instagram, TikTok, YouTube, etc.).*

*Please go to [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5) for information and tools when using social media in your SNAP-Ed programming. If you have questions about the requirements and/or allowables/unallowables listed in this section, contact your MFF Program Manager.*

### **REQUIREMENTS:**

- The Social Media-Web Page Outline document must be provided to MFF prior to implementation.
- All social media must include the following:
  - The nondiscrimination and credit statement must be included in either the About, Bio, or Description section of each social media platform.
  - For videos shared on social media, include the credit statement and logo set graphic panels at the end of your video. Each panel must be onscreen for a minimum of 5 seconds. Graphic panels are available at [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5).
- Visit [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5) for documents, graphics, and additional resources to assist with your video production work.
- All social media content and information must:
  - Align with Key Requirements for SNAP-Ed Programming (refer to page 50);
  - Align with SNAP-Ed at MFF messaging;
  - Not promote or disparage specific products or food;
  - Not share pages or websites that promote or disparage specific products or food;
  - Not be controversial or divisive; and
  - Not promote any ‘like’ and ‘share’ contest.
- Social media activities must be tracked in monthly highlights/progress reports. Visit [michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5](https://michiganfitnessfoundation.box.com/s/8fmqs0xw2zpc1lsdn7iknqcfcw7dcuc5) for details on how to report channel(s), frequency, and analytics (e.g., number of followers, number of posts, overall reach, and engagement such as comments, likes, and shares).

- Staff time and effort to promote SNAP-Ed programming (e.g., classes, events, storytelling, etc.) and behavioral nudges using social media must be included as part of SNAP-Ed duties in the SNAP-Ed Budget.

*Note: You are responsible for monitoring social media platforms that are used for your SNAP-Ed work. Ensure you respond to users who comment on your posts and address or remove any inappropriate comments in a timely fashion.*

### **ALLOWABLE COSTS:**

- Credible content that promotes local SNAP-Ed DE and/or PSE change programs, interventions, events, and/or strategies;
- Credible content that engages SNAP-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 COSTS:**

- 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 Communications team deems inappropriate.

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## Space Allocation

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### **REQUIREMENTS:**

- Space must be allocated when staff members are not 100% 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 COSTS:**

- 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 COSTS:**

- 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 a SNAP-Ed program.
- 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 recording 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 to SNAP-Ed, 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 SNAP-Ed at MFF guidelines.
- All time and effort reports should be kept and archived locally. Subrecipients 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 subrecipient and not charged to the SNAP-Ed program.

### **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. Refer to the Volunteers section at the end of these Program Parameters (page 74) for more details about volunteers.

### **ALLOWABLE COSTS:**

- 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 memorandum 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 COSTS:**

- 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 expenses include testing, background checks, finger printing, drug testing, etc.

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## Training, Conferences, and Workshops

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*A conference is defined by USDA as "a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award." Please note that this section contains important details for both attending and hosting trainings.*

*Refer to "Travel and Meal Rates" in the Additional Information section (page 80) for more details.*

### **Trainings hosted by MFF**

- MFF offers a variety of trainings for subrecipient lead staff, nutrition educators/facilitators, physical educators, and others who implement SNAP-Ed programming.
- MFF covers a range of costs (e.g., registration, meals, and hotel rooms) for multi-day trainings or if you are traveling from a distance. Each training has varying costs, you must review registration information and plan and budget accordingly.
- Subrecipients are responsible for training costs not covered by MFF.
- Trainings are added or eliminated based on grant requirements and the needs of organizations delivering SNAP-Ed programming locally. For more information on SNAP-Ed trainings, including dates, locations, and registration, please visit [mff.connect.space](https://mff.connect.space).

### **REQUIREMENTS:**

- Staff attendance at trainings, conferences, workshops, meetings, and summits must be aligned with the SNAP-Ed programming outlined in the Program Summary and Budget included with your contract.
- Prior written authorization is required from MFF prior to attendance at any training, conference, or workshop. Requests must include:

- Justification of the purpose, including how the information will benefit SNAP-Ed eligible people (your program participants) or intermediaries (disseminated to educators and collaborators) working with SNAP-eligible people;
- How attendance is necessary to achieve SNAP-Ed program goals and objectives;
- Number of staff attending. Identify and justify the number and type of staff making the travel request; and
- Proration for attendance at trainings, conferences, and workshops that are mutually beneficial to the subrecipient's non-SNAP-Ed programs must be pre-approved.
- When submitting for reimbursement for expenses after conducting a training or meeting, the following must be submitted:
  - Itemized receipts for all expenses being reimbursed;
  - The agenda documenting the start and end time; and
  - 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.

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](https://snap-ed.michiganfitness.org/forms).

### **ALLOWABLE COSTS:**

- Training related to SNAP-Ed program activities (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 Program Summary and Budget included with your contract;
  - a. Actual travel costs to attend pre-approved trainings (supported by itemized documentation) are eligible for reimbursement, not exceeding the posted SNAP-Ed allowable rates.
- When conducting a training or meeting, lunch costs may be reimbursed if the following criteria are met:
  - Meal costs do not exceed the allowable meal rates;
  - If the training has at least six hours of SNAP-Ed content; or
  - If the training has at least five hours of SNAP-Ed content AND at least 50% 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](https://snap-ed.michiganfitness.org/forms). (State travel and meal rates are usually updated around January 1<sup>st</sup>.);
- Participation in regional or state coalitions on SNAP-Ed-specific business;
- SNAP-Ed-related training for program delivery staff (e.g., Choices, SNAP-Ed U, regional MFF meetings and trainings);
- Prorated meetings, conferences, and summits aligned with SNAP-Ed program activities. Costs must be prorated based on:
  - a) The proportion of the target audience that are SNAP eligible; and
  - b) 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 program activities approved in the Program Summary and Budget included with your contract.



- Nutrition specific mental and/or emotional health training for SNAP-Ed staff that directly correlates with a SNAP-Ed project or intervention.

### **UNALLOWABLE COSTS:**

- 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 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.

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## Travel

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### **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.

SNAP-Ed at MFF follows the State of Michigan's travel regulations (see [michigan.gov/dtmb/services/travel](https://michigan.gov/dtmb/services/travel)). Travel rates, including those for mileage, meals, and lodging, may change throughout the program year and will be updated, as needed, in the Programming and Operations Manual and the Travel and Meal Rates document found at [snap-ed.michiganfitness.org/forms](https://snap-ed.michiganfitness.org/forms). You are responsible for understanding the most up-to-date travel guidance and using the correct rates.

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*If your organization has a documented employee travel reimbursement policy that applies to all programs and differs from the SNAP-Ed at MFF rates, submit a copy of the written policy to MFF to have your SNAP-Ed travel costs reimbursed at your organization's rates.*

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Refer to "Travel and Meal Rates" in the Additional Information section (page 80) for more details.

### **ALLOWABLE COSTS:**

- Travel costs associated with SNAP-Ed at MFF business including SNAP-Ed at MFF-sponsored training or events. (These expenses may be 100% reimbursed even if the person is not 100% FTE on SNAP-Ed if the purpose for which that person is attending is solely for SNAP-Ed work.);
- 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 \$0.67 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 COSTS:**

- 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.

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## Volunteers

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### **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 (page 70), when applicable.

### **ALLOWABLE COSTS:**

- 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.:
  - A volunteer contributes time to produce a weekly nutrition newsletter to distribute to SNAP-eligible residents;
  - A retired dietitian volunteers to teach nutrition education classes to SNAP eligible; or
  - A college student volunteers to do food tasting demos for SNAP-Ed eligible people 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 COSTS:**

- Volunteer time that is not used toward SNAP-Ed program activities;
- 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.

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## Websites and Domain Names

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*Web hosting and domain names purchased or developed with SNAP-Ed funds carry a nonexclusive waiver-free right for public use. If your program will use the domain name beyond the scope of your SNAP-Ed work, you should purchase the domain with non-SNAP-Ed funds.*

### **REQUIREMENTS:**

- A SNAP-Ed focused website outline must be provided to MFF prior to implementation. Include details about purpose, content (source), frequency of updates (who and how often), strategies to promote your website to SNAP-Ed eligible households, and estimated staff time to manage SNAP-Ed content.
- All content and information must:
  - Align with Key Requirements for SNAP-Ed Programming (refer to page 50);
  - Align with SNAP-Ed at MFF messaging;
  - Not promote or disparage specific products or food;
  - Not share pages or websites that promote or disparage specific products or food;
  - Not be controversial or divisive; and

- Not promote any 'like' and 'share' contest.
- Whenever possible, websites (blogs, vlogs, etc.) should link to established, allowable, and evidence-based websites to convey scientifically-sound, accurate information. Time spent creating similar information may not be reimbursable.
- Appropriate nondiscrimination and credit statements must be displayed on websites (blogs, vlogs, etc.) and web pages.
- Analytics on the usage of website/page must be collected and reported as part of your monthly highlight report.
- Signed photo releases or documentation of legal use, permissions, or purchase of all photos used on the website must be on file.

### **ALLOWABLE COSTS:**

- Purchase of host sites and domain names if approved in your Program Summary and Budget included with your contract;
- Staff time or contractor to develop, maintain, and evaluate a website focused on the SNAP-Ed program activities approved in your Program Summary and Budget included with your contract; and
- Purchase of reasonable and necessary tools and resources to support the development of your website (e.g., photos).

### **UNALLOWABLE COSTS:**

- Websites (blogs, vlogs, etc.), web pages, or links that do not meet the requirements listed above.

# Additional Information

This section includes additional information that will assist you in successfully and accurately implementing your SNAP-Ed program.

## Table of Contents

### Page

Abbreviations/Acronyms .....	77
Nondiscrimination Statement .....	78
Travel and Meal Rates.....	80
Recipe Selection and Tasting Size Guidelines .....	82
Definitions.....	85

# Abbreviations/Acronyms

- CACFP – Child and Adult Care Food Program
- CFR – Code of Federal Regulations
- CSFP – Commodity Supplemental Food Program
- DE – Direct Education
- DGA – Dietary Guidelines for Americans
- EFNEP – Expanded Food and Nutrition Education Program
- FDPIR – Food Distribution Program on Indian Reservations
- FNS – Food and Nutrition Service
- FPG – Federal Poverty Guidelines (sometimes referred to as FPL, or Federal Poverty Level)
- FY – Fiscal Year
- HRQL – Health Related Quality of Life
- IC – Indirect Channel
- IE – Indirect Education
- MDHHS – Michigan Department of Health and Human Services
- MFF – Michigan Fitness Foundation
- MiSNAC – Michigan State Nutrition Action Committee
- 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
- 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

# Nondiscrimination Statement

The nondiscrimination statement lists all of the prohibited bases for discrimination contained in the USDA Civil Rights Policy Statement. Materials that should have the nondiscrimination statement include print (e.g., brochures, newsletters, education curricula, etc.) and non-print (e.g., audio, videos, websites, etc.) forms of communication.

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*All materials developed, adapted, or printed with SNAP-Ed funds that are shared in public must include, in a reasonably-sized font, the shortened USDA nondiscrimination statement:*

***“This institution is an equal opportunity provider.”***

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The minimum font size for nondiscrimination statements for brochures is 8 point. For all other printed materials and web pages, the statement must be legible. Failing to use the USDA Nondiscrimination Statement could result in items not being eligible for reimbursement.

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*Please refer to [fns.usda.gov/cr/fns-nondiscrimination-statement](https://fns.usda.gov/cr/fns-nondiscrimination-statement) for more information on translated statements.*

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The full nondiscrimination statement provided below is rarely, if ever, required for SNAP-Ed. It is only necessary to include the full nondiscrimination statement if SNAP or other FNS program eligibility or application information is provided.

*Example:*



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



For reference, the full USDA nondiscrimination statement is included below:

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

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339.

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

**(1) mail:**

Food and Nutrition Service, USDA  
1320 Braddock Place, Room 334  
Alexandria, VA 22314; or

**(2) fax:**

(833) 256-1665 or (202) 690-7442; or

**(3) email:**

[FNSCivilRightsComplaints@usda.gov](mailto:FNSCivilRightsComplaints@usda.gov)

This institution is an equal opportunity provider.

For additional information on nondiscrimination statement requirements, refer to the Nondiscrimination Statement section in Program Parameters (page 52).

# Travel and Meal Rates

**SNAP-Ed at MFF follows the State of Michigan's travel regulations.** Travel rates, including those for mileage, meals, and lodging, may change throughout the program year and will be updated in the Programming and Operations Manual and the Travel and Meal Rates document found at [snap-ed.michiganfitness.org/forms](https://snap-ed.michiganfitness.org/forms). You are responsible for understanding the most up-to-date travel guidance and using the correct rates. More information on Michigan travel regulations can be found at [michigan.gov/dtmb/services/travel](https://michigan.gov/dtmb/services/travel).

*If your organization has a documented employee travel reimbursement policy that applies to all programs and differs from the SNAP-Ed at MFF rates, submit a copy of the written policy to MFF to have your SNAP-Ed travel costs reimbursed at your organization's rates.*

**Out-of-state travel is not allowed.**

## Mileage

\$0.67/mile (as of January 1, 2024)

## Meals

Meals (without alcoholic beverages) are reimbursed during overnight travel only. The State of Michigan requires the **itemized receipt\* for any meals while in travel status**. These will be reimbursed at the actual cost up to, but not over, the maximum SNAP-Ed allowable rate. You must be in overnight status to claim meals and must indicate the location (e.g., city) of lodging, even if not claiming that lodging for reimbursement.

- It is preferred that each individual submit their own itemized meal receipts.
- If meals for multiple people are on the same itemized receipt:
  - Each individual can be reimbursed for actual expenses up to the maximum SNAP-Ed allowable rate for that meal. Include the names of those people by their meal items for clarity; and
  - If at least one person's meal exceeds the maximum SNAP-Ed allowable meal rate, you should indicate each individual's reimbursement amount (not to exceed SNAP-Ed rates) instead of submitting for the maximum reimbursement for all people in your party.
- If you opt out of a meal that is provided as part of your travel (e.g., a conference meal), you cannot claim reimbursement for that meal.

	Standard	Select Cities/Counties
<b>Breakfast</b>	\$9.75	\$11.75
<b>Lunch</b>	\$9.75	\$11.75
<b>Dinner</b>	\$22.00	\$28.00

### Select Cities:

Ann Arbor  
Auburn Hills  
Beaver Island  
Detroit  
Grand Rapids  
Holland

Leland  
Mackinac Island  
Petosky  
Pontiac  
South Haven  
Traverse City

### Select Counties:

Grand Traverse  
Oakland  
Wayne

## Lodging

The SNAP-Ed lodging rate is \$85/night\*\* (taxes are in addition to this maximum amount). We encourage you to ask for the 'government rate' when making your reservation. Not all hotels will agree to the \$85/night rate. State of Michigan **requires an itemized receipt\* for lodging expenses**.

*\*\*Exception to the \$85/night lodging limit: If the traveler is attending a conference and staying in the hotel where the conference is being held, they may use that rate **IF** they include a copy of the conference brochure stating the conference rate and includes the conference agenda with the receipts.*

## Michigan SNAP-Ed Meal Rates for Meetings and Trainings

When conducting SNAP-Ed training or meetings, lunch costs may be reimbursed, within SNAP-Ed allowable rates described below, if the training/meeting:

- Has at least six hours of SNAP-Ed content; or
- Has at least five hours of SNAP-Ed content AND at least 50% of the participants have traveled at least 30 minutes one way to attend.

Costs for a light breakfast are not allowable.

## SNAP-Ed Group Meal Rates

The group meal rates (below) must include cutlery, beverage, tax, gratuity, service/delivery fees, and any other expenses associated with the meal.

Lunch – \$12.75/person

When submitting for reimbursement for training or meeting expenses, the following must be submitted:

- Itemized receipts\* for all expenses being reimbursed;
- The meeting/training agenda documenting the meeting start and end time; and
- A sign-in sheet documenting the number of participants at the meeting/training.
  - If the number of participants who registered for the meeting/training is significantly lower than the number of actual participants (causing the per person meal rate to be more than allowed), please provide registration logs as well.

*\*For more information on invoicing, including details on supporting documentation, refer to “Monthly Invoices” in the Grant Management section (page 22).*

# Recipe Selection and Tasting Size Guidelines

Refer to the Food Demonstrations and Food Tastings section in Program Parameters (page 57) for allowability and requirements.

## Recipe Selection Guidelines

When planning food demonstrations and tastings, select recipes that reinforce the lesson being taught (e.g., a vegetable lesson should feature a vegetable recipe). Additionally, recipes should meet the following criteria:

### Ingredients

- Use no more than 15 ingredients, preferably eight (8) or fewer.
- Use low-cost, readily available ingredients, and/or identify appropriate substitutions for expensive or uncommon ingredients.
- Use culturally appropriate ingredients that participants may have in their homes and/or buy at a reasonable cost.
- Be flexible and specify whether fresh, canned, frozen, and/or dried versions of fruits and vegetables can be used/substituted or other adaptations made with herb/spice ingredients, etc.
- Not contain alcohol.

### Instructions and Preparation

- Assume little or no cooking knowledge or experience and written at 6<sup>th</sup> grade reading level.
- Be prepared relatively quickly. (Recipes that include an estimated amount of time to prepare and cook are preferred.)
- Use common measurements. For example, if a recipe uses weight measurements (grams) for ingredients, it also includes volumetric (cups) measurements.
- Use basic equipment and appliances that participants would likely have in their homes and/or purchase with minimal cost.
  - If a recipe calls for the use of specialty equipment not likely to be available to most participants, is there an alternative? For example, if the recipe calls for the use of a mandolin, instruct participants to thinly slice instead.

### Nutrition

- Be consistent with the most recent [\*Dietary Guidelines for Americans\*](#) – low in salt, sugar, and saturated fats, if possible.
  - Recipes and serving sizes should be considered in terms of their contribution to a healthy diet. For example, an ingredient or recipe may be high in saturated fat, but when consumed as part of an entire day's intake, it may balance out to meet the recommendation.
- Focus on nutrient-dense ingredients.
- Provide a new way to enjoy a fruit or vegetable. For example, in lieu of a zucchini bread recipe, try the Zucchini Coleslaw recipe from the MyPlate Kitchen website.
- Include nutrition information, number of servings, and serving sizes.
- Include food safety information, such as cooking and storing temperatures.

## Tasting Size Guidelines

The SNAP-Ed Guidance describes a food tasting as “ $\frac{1}{4}$  -  $\frac{1}{2}$  of a serving”.

- 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.
- Multiple tasting opportunities in the same sitting 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 children ages 9-13 years 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  $\frac{1}{2}$  -  $\frac{3}{4}$  cup raw fruits, or 1 total serving from the fruit group.
- 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).
- It is important to accurately track and document the number of participants for a food tasting. This may be challenging for some venues or events.
  - Consider counting the number of servings prepped and subtracting the number of the remaining serving items (e.g., plates) at the end of the event.

*See the **Small Taste Tasting Size** column in the table below to find, by age and food group, the size of a **small taste**.*

## Food Tasting Sizes by Food Group and Age

VEGETABLES	TYPE	SERVING SIZE	SMALL TASTE TASTING SIZE
Children: 2 – 8 years	Raw	$\frac{1}{2}$ cup	2 Tbsp. – $\frac{1}{4}$ cup
	Canned	$\frac{1}{4}$ cup	2 Tbsp.
	Juice	2 oz.	1 oz.
Children: 9 – 13 years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	2 Tbsp. – $\frac{1}{2}$ cup
	Juice	4 oz.	2 oz.
Youth: 14 – 17 years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	$\frac{1}{4}$ cup
	Juice	4 oz.	2 oz.
Adults: 18 – 59 years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	$\frac{1}{4}$ cup
	Juice	4 oz. juice	2 oz.
Older Adults: 60+ years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	$\frac{1}{4}$ cup
	Juice	4 oz. juice	2 oz.

FRUITS	TYPE	SERVING SIZE	SMALL TASTE TASTING SIZE
Children: 2 – 8 years	Raw	$\frac{1}{2}$ cup	2 Tbsp. – $\frac{1}{4}$ cup
	Canned	2 Tbsp. – $\frac{1}{2}$ cup	2 Tbsp.
	Juice	2 oz.	1 oz.
Children: 9 – 13 years	Raw	$\frac{1}{2}$ - $\frac{3}{4}$ cup	2 Tbsp. – $\frac{1}{4}$ cup
	Canned	2 Tbsp. – $\frac{1}{2}$ cup	2 Tbsp.
	Juice	2 oz.	1 – 2 oz.
Youth: 14 – 17 years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	2 Tbsp. – $\frac{1}{2}$ cup
	Juice	4 oz.	1 – 2 oz.
Adults: 18 – 59 years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	$\frac{1}{4}$ cup
	Juice	4 oz.	2 oz.
Older Adults: 60+ years	Raw	1 cup	$\frac{1}{4}$ - $\frac{1}{2}$ cup
	Canned	$\frac{1}{2}$ cup	$\frac{1}{4}$ cup
	Juice	4 oz.	2 oz.

GRAINS	TYPE	SERVING SIZE	SMALL TASTE TASTING SIZE
Children: 2 – 8 years	Bread Cereal Pasta	½ slice ½ cup ¼ cup	¼ slice 2 Tbsp. 2 Tbsp.
Children: 9 – 13 years	Bread Cereal Pasta	1 slice ½ cup ½ cup	¼ - ½ slice ¼ cup ¼ cup
Youth: 14 – 17 years	Bread Cereal Pasta	1 slice ½ cup ½ cup	¼ - ½ slice ¼ cup ¼ cup
Adults: 18 – 59 years	Bread Cereal Pasta	1 slice ½ cup ½ cup	¼ - ½ slice ¼ cup ¼ cup
Older Adults: 60+ years	Bread Cereal Pasta	1 slice ½ cup ½ cup	¼ - ½ slice ¼ cup ¼ cup

DAIRY	SERVING SIZE*	SMALL TASTE TASTING SIZE
Children: 2 – 8 years	1 cup	¼ - ½ cup
Children: 9 – 13 years	1 cup	¼ - ½ cup
Youth: 14 – 17 years	1 cup	¼ - ½ cup
Adults: 18 – 59 years	1 cup	¼ - ½ cup
Older Adults: 60+ years	1 cup	¼ - ½ cup

*\*Dairy foods equivalent to 1 cup include 8 oz. of yogurt, 8 oz. of milk or soy milk, 1 ½ oz. natural cheese, 2 cups cottage cheese.*

PROTEIN	SERVING SIZE	SMALL TASTE TASTING SIZE
Children: 2 – 8 years	2 oz.	½ - 1 oz.
Children: 9 – 13 years	3 oz.	1 oz.
Youth: 14 – 17 years	3 oz.	1 oz.
Adults: 18 – 59 years	3 oz.	1 oz.
Older Adults: 60+ years	3 oz.	1 oz.



# 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 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 the 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 Program 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 program summary;
- Be included in your approved budget;
- Be pre-approved as appropriate; and
- Be “reasonable and necessary” for the accomplishment of approved program objectives.

**Approaches** are types of intervention strategies. There are three SNAP-Ed approaches. Programs must include approach 1 AND approach 2 or 3 (both may be included). 1. Individual or group-based direct nutrition education, health promotion, and intervention strategies 2. Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels 3. Community and public health approaches to improve nutrition and obesity prevention.

**Behavior** indicates action rather than knowledge or attitudes.

**Behavioral Nudges** are influences on consumers choice, such as altering the environment or making statements about the benefit of eating fruits and vegetable or being active, making it more likely that an individual will change their behavior in a predictable way (e.g., eat more fruits and vegetables) without forbidding any options.

**Behaviorally Focused** are those activities, interventions, objectives and strategies that are related to (a) healthy food choices (e.g., adding one fruit or vegetable each day); (b) other nutrition or physical activity issues; (c) the environmental impact of dietary practices; and (d) food shopping practices that increase purchasing power and availability of food.

**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](https://map2healthyliving.org).

**Cognizant Agency** refers to the agency that has been identified by the Office of Management and Budget (OMB) that is responsible for establishing indirect cost rates. For more information see “Indirect Cost Rate.”

**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.

**Commodity Supplemental Food Program (CSFP)** is the program that works to improve the health of low-income persons at least 60 years of age by supplementing their diets with nutritious USDA foods.

**Communication Channels** (also referred to as distribution channels) are media through which a message is delivered to its intended audience, such as print, radio, and electronic. These channels include:

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

**Direct Education (DE)** is an evidence-based, behavior-focused nutrition education and physical activity intervention conducted at the individual and interpersonal levels with an intensity and duration that supports behavior change and allows for active engagement in-person, in a live online format, or through interactive media.

**EFNEP** is the **Expanded Food and Nutrition Education Program** of the National Institute of Food and Agriculture, U.S. Department of Agriculture. EFNEP is conducted by Cooperative Extension, through a Federal, State, and local (community-based) partnership. It serves youth and families with limited financial resources in all States and U.S. Territories. 1862 and 1890 Land-Grant Universities provide state-level leadership for local programming. EFNEP employs paraprofessionals to deliver evidence-based, hands-on, interactive lessons to participants. State and local EFNEP leadership also contribute to policy, systems, and environmental change efforts through their Extension and University connections. EFNEP staff work collaboratively with SNAP-Ed staff to increase reach and facilitate improved nutritional well-being among low-income populations nationwide. For more information on EFNEP and supporting resources, see [nifa.usda.gov/program/about-efnep](https://nifa.usda.gov/program/about-efnep).

**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.

**Evaluation:** See the definitions for Formative Evaluation, Outcome Evaluation, Process Evaluation, and Impact Evaluation below. For more information on evaluation, refer to the SNAP-Ed at MFF Evaluation Requirements section (page 41).

- **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.
- **Impact:** Indicates how effective the intervention was in changing the target populations' behavior.

**Evidence-Based** approaches for nutrition education and obesity prevention are defined as the integration of the best research evidence with the best available practice-based evidence. The best research evidence refers to 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 Distribution Program on Indian Reservations (FDPIR)** provides USDA foods to income-eligible households living on Indian reservations, and to Native American households residing in approved areas near reservations or in Oklahoma.

**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 [feedingamerica.org/hunger-in-america/hunger-studies/map-the-meal-gap.aspx](https://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.

**Funding Award** is the dollar amount stated in the subrecipient provisional award letter, included in the Michigan SNAP-Ed Plan of Work, and then approved by FNS USDA. It is the dollar amount included in the subrecipient contract and the maximum dollar amount that a subrecipient organization can be reimbursed through SNAP-Ed after a contract has been fully executed.

**Health Related Quality of Life** is an individual's or group's perceived physical and mental health over time.

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

**Implementing Agencies** are contracted to provide SNAP-Education and include Cooperative Extension offices, universities, State departments of health or education, State level nutrition networks, food banks, and other organizations.

**Impressions** represent the total number of times content is displayed to an audience during a given period. This metric is commonly used and readily available for most channels.

**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.

**Indirect Education (IE)** is the distribution or display of evidence-based information and resources, including any mass communications, public events (such as health fairs), and materials distribution, which involve minimal or no active participant interaction with an instructor or multimedia. Distribution of educational materials alone does not constitute an evidence-based intervention. Indirect education activities, or distribution of supplemental materials through indirect intervention channels, should take place within an evidence-based intervention. Indirect education materials used should be evidence-based and/or be based on the Dietary Guidelines for Americans (DGA) and the Physical Activity Guidelines (PAG).

**Indirect Channels (IC)** (not to be confused with communication channels) describe the medium of education used for indirect education. They include:

- Electronic materials (e.g., email and electronic newsletters or mailings/text messaging).
- Hard copy materials (e.g., fact sheets, flyers, pamphlets, activity books, posters, banners, postcards, recipe cards, or newsletters for mailings).
- Nutrition education reinforcement items (NERI - visit [snap-ed.michiganfitness.org/neri](https://snap-ed.michiganfitness.org/neri) for information on no-cost items available to SNAP-Education at MFF-funded organizations).
- Point-of-sale or distribution signage (e.g., displays or window clings in retail stores).
- Videos (includes CD, DVD, and online video sites like YouTube).
- Websites.

**Interactive Media** is a mode of delivery of SNAP-Education direct education that includes active participant interaction and engagement, is considered virtual in nature and may be self-paced and/or self-directed. Instructors and participants are not in the same virtual space at the same time.

**Interventions** are a specific set of evidence-based, behaviorally-focused activities and/or actions 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 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.

**Literature, Audiovisuals, and Materials** are the educational and promotional materials required to implement SNAP-Education program activities that move participants toward your program objectives (e.g., participant handouts, newsletters, presentations, recruitment flyers, recipe cards, etc.).

**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 200% (in Michigan) 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 200% (in Michigan) 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 200% (in Michigan) of the Federal Poverty Guidelines.

**Management Evaluation (ME)** is a periodic assessment of local program operations including compliance.

**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 200% (in Michigan) of the Federal Poverty Guidelines.

**Multi-Level Interventions** reach the target audience at more than one level of the Social-Ecological Model 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, needs, and assets 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.

**Nutrition Security** means all Americans have consistent and equitable access to healthy, safe, affordable foods essential to optimal health and well-being.

**OMB Grant Guidance or Uniform Guidance (UG)** consolidates and streamlines administrative requirements, cost principles, and audit requirements for Federal awards.

**Period of Performance** means the total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. (2 CFR 200.77).

**Policy, Systems, and Environmental (PSE)** change initiatives have the potential to improve a community's health by making healthy food and physical activity choices more accessible, easier, and the default option.

- **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.

**Poverty Guidelines** are an administrative version of the Federal poverty measure and are issued annually by the Department of Health and Human Services in the Federal Register. Sometimes referred to as the Federal Poverty Level, these guidelines are often used to set eligibility for certain programs. Learn more here: [aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines](https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines).

**Poverty Thresholds** are the statistical version of the Federal poverty measure and are released annually by the Census Bureau. They are used to estimate the number of persons in poverty in the United States or in States and regions. For more information, visit: [census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html](https://census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html).

**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.

**Program 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% 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 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](https://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% of the population has incomes at or below 200% (in Michigan) of the Federal Poverty Guidelines. To identify qualified census tracts in Michigan, visit [map2healthyliving.org](https://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

According to the Federal Uniform Guidance, a **reasonable** cost is one that is not more than the amount a person using good judgment and common sense would spend under similar circumstances; however, to be allowable expense, a cost not only must be reasonable but also **necessary**.

All SNAP-Ed program expenditures must meet ALL the following reasonable and necessary criteria:

- Reasonable
  - Cost is in line with the anticipated benefit to the program (i.e., the potential benefit to the program is worth or outweighs the cost).
  - Cost for the program expense or activity is justified by anticipated reach, function, and/or frequency of use.
  - Cost is in line with other comparable goods or services and conforms with any organizational procurement policy.
- Necessary
  - Cost is needed for expenses or activities essential to program or administrative functions.
  - If the cost is NOT incurred, programming and/or program operations would be negatively impacted.
  - Cost is not for a duplicate of existing inventory and/or community efforts.

**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\*](#).

**SNAP Outreach** is a SNAP functional area which provides information or assistance to individuals who might be eligible for SNAP (<https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap>) in order to help them make an informed decision whether to apply for the Program.

**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-Ed Target Audience** includes SNAP participants, low-income individuals eligible to receive benefits under SNAP or other means-tested Federal assistance programs, and individuals residing in communities with a significant (50 percent or greater) low-income population.

**Social-Ecological Model (SEM)** 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** 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.

**Social Marketing Campaign** is defined as a coordinated set of communications delivered to one or more SNAP-Ed market segments to a particular population across a large geographic area. It is typically branded, communicates a common call to action, is delivered in multiple complementary settings and channels, and focuses on one or more priority behavior changes.

**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.

**Subrecipients** are organizations who receive funding from SNAP-Ed at MFF to conduct nutrition education and obesity prevention activities. Also known as sub-grantees, subrecipients are accountable for the use of funds provided. Per the Federal Uniform Guidance (2 CFR § 200.330), subrecipients:

- Determine who is eligible [based on Target Audience criteria provided by USDA FNS] to receive what Federal Assistance [SNAP-Ed programming and resources];
- Have their performance measured in relation to whether program objectives were met;
- Have responsibility for programmatic decision making;
- Are responsible for adherence to applicable Federal program requirements specified in the Federal award [contract]; and
- In accordance with their agreement [contract], uses the Federal funds to carry out a program for a public purpose specified in authorizing statute [for SNAP-Ed: 7 CFR §272.2 (d)(2)(vii)(B)].

**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 programming (DE or PSE). An individual that participates in more than one SNAP-Ed intervention may be counted as unduplicated for the first contact for each intervention.