

# Washington State SNAP-Ed Guidance FFY 2023

Purpose .....	4
SNAP-Ed Organization in Washington .....	4
Roles and Responsibilities.....	4
State Agency: Department of Social and Health Services.....	4
Implementing Agency: Department of Health, Spokane Regional Health District, Washington State University .....	4
Local Implementing Agency/Provider.....	5
Curriculum, Training, and Websites: Washington State University.....	5
Evaluation: Department of Health .....	6
Regional Leads Program: Washington State Farmers Market Association.....	6
Workgroups .....	6
Leadership Team.....	6
CTW Planning Action Committee.....	6
Site Eligibility Workgroup.....	7
PEARS Workgroup.....	7
Key Performance Indicator Workgroup.....	7
Programming Considerations .....	7
Qualifying Programming .....	7
How to Determine if a Census Tract is Eligible for SNAP-Ed.....	7
<i>Creating Census Tract Eligibility Spreadsheet</i> .....	7
<i>Using Census Data to Check Site Eligibility Using a Single Address</i> .....	11
<i>Using Census Data to Check Site Eligibility Using Multiples Addresses</i> .....	14
Resources .....	16
Direct Education.....	16
SNAP Promotion .....	16
SNAP-Ed Guidance .....	16
SNAP Promotion Rule .....	17
WA DSHS Interpretation of SNAP-Ed Allowable and Unallowable Activities .....	18
Photographs and Release Forms .....	19
Social Media Guidelines.....	19
Evaluation Guidelines .....	19
Contract Requirements.....	19
DSHS SNAP-Ed Contacts.....	19

Instructions for Filling out the Contractor Workbook .....	20
Indirect Costs .....	21
Subcontractor Approval.....	21
Answers to Common Subcontractor Checklist Questions .....	21
Plan and Budget Amendments .....	23
FNS Requirements for Plan Amendments .....	23
Additional DSHS Requirements for No-cost Amendments .....	24
Invoices .....	24
Civil Rights Training.....	26
Costs That Require Prior Approval from FNS.....	26
Conferences and Travel .....	26
Equipment Ownership .....	27
Definitions.....	27
Property Standards .....	29
Management Evaluations .....	32
Overview .....	32
Process .....	33
Planning.....	33
On-Site Program Review .....	34
Fiscal Review .....	35
Local Implementing Agency Survey .....	36
Desk Review (alternate option) .....	36
Reporting.....	36

## Purpose

This document describes all state processes and requirements. DSHS expects contractors to comply with the FNS FFY 2021 SNAP-Ed Plan Guidance and the FNS-approved Washington SNAP-Ed State Plan for FFY 21–23. This guidance was updated for FFY2022.

## SNAP-Ed Organization in Washington

The Introduction to the FFY21–23 State Plan includes an overview of the state’s SNAP-Ed structure, including a description of the state agency, implementing agencies, and statewide initiatives.

## Roles and Responsibilities

### **State Agency: Department of Social and Health Services**

- Oversee and manage contracting with IAs and SWIs within respective region including:
  - Identifying and executing contracts with IAs and SWIs
  - Determining state and regional funding allocations
  - Developing regional budgets
  - Invoicing
  - Monitoring IAs and SWIs
  - Ensuring representation in planning
  - Record Keeping
- Oversee organizational structure
- Support LT by providing:
  - Timelines
  - Clear expectations of roles and responsibilities
  - Regular, transparent communication
- Convene and facilitate the LT through monthly calls and quarterly in-person meetings
- Coordinate reporting to FNS, including three-year plans, program data, and annual report
- Communicate updates/changes from FNS to LT
- Provide guidance (or seek clarification from FNS) on allowable/unallowable program activities and expenses and ensure programming is consistent with federal and statewide guidance
- Recognizing work from LT and LIAs and sharing program successes at the Federal, state, and local levels
- Provide leadership and statewide direction
- Resolve challenges between LIAs and IAs or SWIs
- Facilitate connections with Community Services Offices and the Customer Service Contact Center and other DSHS programs

### **Implementing Agency: Department of Health, Washington State University**

- Oversee and manage contracting with LIAs within respective region including:
  - Identifying and executing contracts with LIAs
  - Determining funding allocations within region
  - Developing and managing regional budgets
  - Invoicing

Update includes: Active Implementing Agencies, Workgroups, Program Contacts

- Monitoring LIAs
- Ensuring representation in planning
- Record Keeping
- Ensure that programming is consistent with federal program requirements and guidance and seek DSHS clarification when necessary
- Serve in and participate, including representing LIAs and local/regional perspectives in SNAP-Ed Leadership Team
- Provide programmatic support, mentorship, and technical assistance to LIAs and help address challenges
- Support implementation of SNAP-Ed interventions
- Develop resources for LIAs, as needed, in coordination with other IAs. Sharing and adapting existing resources are encouraged as long as regional needs are met
- Communicate updates from SWIs with LIAs and provide LIA feedback to SWIs
- Provide subject matter expertise and LIA perspective (such as implementation implications) in the development of SWIs, including evaluation pilots, training opportunities, curricula, and programming at farmers markets
- Help LIAs establish connections with Regional Farmers Market Leads
- Coordinate with CTW in planning and executing site visits for curriculum fidelity including providing teaching calendars
- Ensure data is entered in PEARS by deadlines, surveys are submitted to evaluation for quality assurance, and any data collection challenges are quickly reported to evaluation and/or DSHS. In FFY21–FFY22, the PEARS workgroup will develop a data quality assurance checklist for Implementing Agencies.
- Serve as the primary direct connection between LIAs and the LT

### **Local Implementing Agency/Provider**

- Implement and develop evidence-based interventions as described in the state plan at the local/regional level in coordination with IAs
- Plan programming in response to community needs and input, including the SNAP-eligible population, partners, tribes, and other stakeholders
- Provides information to IA/DSHS to share with local human services staff on the availability of SNAP-Ed services
- Collects and reports data regarding participation in SNAP-Ed and characteristics of those served
- Ensures, with support of the IA, SNAP-Ed programming is reaching the target audience
- Builds relationships with other local services providers (WIC, local health departments, childcare, school meals programs, etc.) so referrals of SNAP participants to other nutrition and health-related services can be made as appropriate
- Provides referrals to SNAP for low-income non-participants to access SNAP benefits, as appropriate

### **Curriculum, Training, and Websites: Washington State University**

- Provide LIAs consistency across regions in training, curricula, and website coordination
- Provide IAs SWI updates and information about updates or changes and provide responses to IAs and LIAs with questions about programming

- Identify ways to involves, IAs, LIAs, and SNAP-eligible individuals in decision making, when appropriate
- Share site visit findings/reports and fidelity data
- Provide regular updates regarding curricula, training or websites
- Facilitate the process of identifying allowable curricula for each FFY
- Respond to questions from LIAs through IA

### **Evaluation: Department of Health**

- Provide LIAs consistency across regions in program evaluation
- Provide IAs SWI updates and information about updates or changes and provide responses to IAs and LIAs with questions about programming
- Identify ways to involves, IAs, LIAs, and SNAP-eligible individuals in decision making, when appropriate
- Analyze data and disseminate to LT and LIAs (through IAs) in tools that support planning, such as SNAPshots
- Assists LT and LIAs in interpreting evaluation data and translating it to programming
- Provide guidance to LIAs (if requested through IA) on program evaluation
- Provide guidance to IAs on data collection needs and facilitate IA decision making about evaluation practices

### **Regional Leads Program: Washington State Farmers Market Association**

- Provide LIAs consistency across regions in program evaluation, training, curricula, and market coordination
- Provide IAs SWI updates and information about updates or changes and provide responses to IAs and LIAs with questions about programming
- Identify ways to involves, IAs, LIAs, and SNAP-eligible individuals in decision making, when appropriate
- Link Regional Farmers Market managers with LIAs
- Share information about opportunities for market collaboration

## **Workgroups**

### **Leadership Team**

The SNAP-Ed Leadership Team (LT) is convened by DSHS and consists of staff from the three IAs and four statewide support initiatives. DSHS convenes the LT for monthly check-in meetings and quarterly in-person meetings. The LT is important for coordinating services to prevent duplication and identify opportunities for improving SNAP-Ed programming.

### **CTW Planning Action Committee**

The CTW Planning Action Committee was established to collaborate with the CTW team to determine the best decisions for direct education interventions, statewide training topics and management of two websites. This group is comprised of IA representatives from all five regions, SWIs and the state agency.

In FFY21 the CTW team will explore ways to include the voice of both LIAs and SNAP-Ed participants. The CTW will also address the best way to include representation that is participant focused and client-centered on the Planning Action Committee.

### **Site Eligibility Workgroup**

The site eligibility workgroup was established to update and develop resources and guidance from DSHS to IAs in ensuring that SNAP-Ed programming reaches the eligible audience. In FFY21, the group focused on updating the state plan with more appropriate strategies for determining eligibility and for providing input on resources and support. FFY22, the workgroup served as a source for ongoing TA to IAs. This workgroup has met its goals and ceased meeting for the immediate future, but may resume if need arises.

### **PEARS Workgroup**

The PEARS workgroup was developed in FFY21 to coordinate data entry and establish clear expectations for LIAs, IAs, and the evaluators to ensure data are entered correctly and reviewed. The group reviewed the PEARS modules to highlight common errors and fields that IAs should review prior to submission to the evaluators. These recurring calls were also a source of ongoing TA on PEARS data entry use of the data review checklist is complete. With projects complete, the workgroup has ceased meeting for the immediate future, but may reconvene as need arises.

### **Key Performance Indicator Workgroup**

Implementing Agencies established a Key Performance Indicator Workgroup to develop KPIs that would be most useful in monitoring implementation performance.

## **Programming Considerations**

### **Qualifying Programming**

IAs are responsible for ensuring programming meets the requirements in the FNS Guidance for reaching the SNAP-Ed eligible population. See FFY21–23 State Plan for approved steps to qualify locations. A workgroup of the Leadership Team currently meets once a month to maintain this section of the plan. This group also serves as a peer learning and technical assistance group to consider alternate approaches.

### **How to Determine if a Census Tract is Eligible for SNAP-Ed**

#### *Creating Census Tract Eligibility Spreadsheet*

DSHS will maintain an excel spreadsheet that Implementing Agencies can use to look up census tract and block group income data. Instructions for developing the spreadsheet are below in case an IA wants to access original data.

1. Go to: [censusreporter.org](https://censusreporter.org) (Note, 2020 census data are not available here yet, see step 6 for instructions obtaining 2020 data)
2. Under Explore, search for table C17002: Ratio of Income to Poverty Level in the Past 12 Months.

3. Enter “Washington” as the place or summary level

### Table C17002: Ratio of Income to Poverty Level

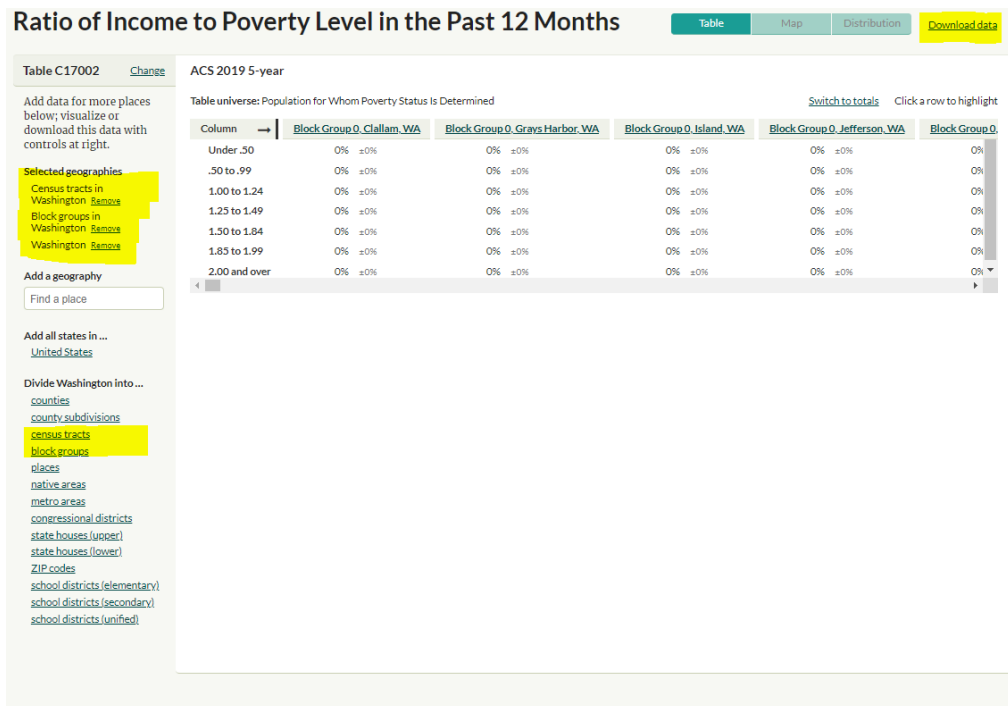
Show data from this table: choose a place or summary level.

Washington

Table C17002	<a href="#">Change</a>	Table universe: Population for Whom Poverty Status Is Determined
Columns in this table		
Total:		
Under .50		
.50 to .99		
1.00 to 1.24		
1.25 to 1.49		
1.50 to 1.84		
1.85 to 1.99		
2.00 and over		
Background on table topics		
Topic pages describe concepts covered by the ACS. For background on the topics in Table C17002, see:		
<ul style="list-style-type: none"> <li><a href="#">Poverty</a></li> <li><a href="#">Public Assistance</a></li> <li><a href="#">Income</a></li> <li><a href="#">Employment</a></li> </ul>		
Detailed table		
The Census offers a version of this table with an expanded set of columns.		
<a href="#">Switch to Table B17002</a>		
Total:		
Under .50		
.50 to .74		
.75 to .99		
1.00 to 1.24		
1.25 to 1.49		
1.50 to 1.74		
1.75 to 1.84		
<a href="#">Show all preview columns</a> ▼		

4. At this point, the data will at the state level. These instructions focus on determining eligibility by census tract or block group. More than one geography type can be selected for a single data download. Start by selecting census tract and block group under, “Divide Washington into...” on the menu on the left of the screen. Once new geographies are added, they will appear under “Selected geographies” on the menu on the left of the screen.





There may be times to review income at another geographical level, including:

- a. Native areas
  - b. Places
  - c. Counties
5. Once all desired geographies are selected, the data can be downloaded as an excel file using the link in the upper right corner.
  6. \*Update/alternate instructions for 2020 Census Data: 2020 Census data can be obtained at this website: <https://data.census.gov/cedsci/table?q=ACS%20C17002&tid=ACSDT5Y2020.C17002>
    - a. Like the instructions detail above, this allows you to select and download different geographies.
  7. There are many ways the data can be cleaned and organized now that it has been downloaded.
    - a. First, transposing the data (by switching rows and columns) can make it easier to read and navigate. To do this, add a new sheet to the excel file. Select all the data from the downloaded sheet and copy. This will highlight the copied data. Go back to the blank sheet. Right click and select the “transpose” option. Now the income categories should appear as column headers, and each census tract will appear as a row.
    - b. At this point, you can delete the original sheet, C17002 Values.
    - c. In the new sheet that you just copied the data to, delete Column A, the title of the data set.

- d. **Delete the error rows.** This can be done efficiently by filtering the data.
  - i. Select data on the Excel menu bar along the top of the program and choose the filter icon in column B and select "Error". This will only show rows that include "Error."
  - ii. Select all the displayed rows and delete. With the filter, no data will appear.
  - iii. Reset the Column B filter so that all rows are showing.
  - iv. Column B can now be deleted.
- e. **Separate census tract number from county.** Now column A should be the list of census tract numbers and counties. Because the same census tract number may be used for multiple counties, now the data should be separated to two columns.
  - i. Insert two blank columns in front of column B
  - ii. Select column A
  - iii. Select data on the Excel menu bar along the top of the program. Choose Text to Columns.
  - iv. A Wizard menu will start. On the first screen, choose delimited. Because the data set separates the census tract number and county with a comma, the Wizard will be able to separate the data where there are already commas. Select Next.
  - v. Choose Comma as the Delimiter on step 2 of 3. Uncheck any other delimiters that may already be selected. The data preview should show the census tract number, county, and state in separate columns. Select Next.
  - vi. On the final screen, select finish.
  - vii. Now the data should be separated into the blank columns.
  - viii. Delete the state column as all data will be in Washington.
  - ix. Adjust the columns to preferred width.
  - x. At this point, IAs may choose to only select counties in their regions. This can be done using the data filter option in the county column.
- f. **Calculate the qualifying percentage.**
  - i. Add two new columns to the left of column E.
  - ii. Name column C "Number of qualifying individuals" and name column D "Percent of qualifying individuals"
  - iii. In cell C2, add the formula "=SUM(F2:K2)" and press enter. This adds the number of qualifying individuals in each of the qualifying income categories.

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Columns F–K represent people whose incomes is <200% of the FPG. The only column that is not counted is column L, the number of people whose income is ≥200% of the FPG.

- iv. In cell D2, calculate the percentage by adding the formula “=C2/E2” and press enter. This divides the number of qualifying individuals by the total number of individuals in that census tract. You can format this number to be a percentage and add the number of visible decimal places using the number properties in Excel.
  - v. Expand calculation to all census tracts. Select cell C2 and D2. Drag from the small square in the bottom right corner to the final row in the spreadsheet. This will replicate the calculations done above.
8. Repeat steps as needed for block groups, areas, or other geographies.

#### *Using Census Data to Check Site Eligibility Using a Single Address*

To see if a site(s) is eligible for SNAP-Ed using census data, use the site’s physical address to look up what census tract and block group the site is in. If a site sits within an eligible census tract or block group, it is eligible for SNAP-Ed. Available census poverty data shows the percent of people in a census tract or a block group who are at or below 200% FPG.

What makes a census tract or block group eligible?

- A census tract is eligible if: 50% or more of people in the census tract are at or below 200% of Federal Poverty Guidelines (FPG).
- A block group is eligible if: 50% or more of people in the block group are at or below 200% of FPG.

#### Address Details

1. Go to [geocoding.geo.census.gov](https://geocoding.geo.census.gov).
2. Under “FIND GEOGRAPHIES USING...”OPTION, select One Line Address or Parsed Address. See highlights below:

The screenshot shows the Census Geocoding website interface. On the left, there is a sidebar menu with two main sections: 'FIND LOCATIONS' and 'FIND GEOGRAPHIES'. Under 'FIND LOCATIONS', there are three options: 'One Line Address Processing', 'Parsed Address Processing', and 'Batch Address Processing'. Under 'FIND GEOGRAPHIES', there are four options: 'One Line Address Processing' (highlighted in yellow), 'Parsed Address Processing' (highlighted in yellow), 'Batch Address Processing', and 'Geographic Coordinates'. On the right, the main content area shows a 'Welcome to Geocoder' message. The message states: 'Census geocoder provides interactive & programmatic (REST) access to users interested in matching addresses to geographic locations and entities containing those addresses. Please see the Services API link below for more information. Geocoding Services API PDF | HTML'.

3. On the next screen, plug in the Street, City, State, and Zip. For 'Vintage' Dropdown, select 'Census2020'\*. Select FIND.

**FIND LOCATIONS**

One Line Address Processing

Parsed Address Processing

Batch Address Processing

**FIND GEOGRAPHIES**

One Line Address Processing

Parsed Address Processing

Batch Address Processing

Geographic Coordinates

Find Address Geographies

House number & Street name :

City :

State :

ZIP Code :

Benchmark :

Vintage :

\* Vintage dropdown selection changes over time but must correspond to the income data obtained from the Census Reporter website. Data were recently released from the 2020 census. Make sure that you are using the corresponding data when looking up income data.

4. Review your **Find Address Results**
  - a. Verify that the Matched Address is the same as what you entered. For example, below shows that the entered address and matched address are the same.

Find Address Geographies

House number & Street name :

City :

State :

ZIP Code :

Benchmark :

Vintage :

Input:  
 Address: 310 Israel Rd. SE  
 City: Tumwater  
 State: WA  
 ZIP Code: 98501  
 Benchmark: Public\_AR\_Current (4)  
 Vintage: Census2020\_Current (420)

Matched Address: 310 ISRAEL RD SE, TUMWATER, WA, 98501  
 Interpolated Longitude (X) Coordinates: -122.90245  
 Interpolated Latitude (Y) Coordinates: 46.985394  
 Tigerline ID: 180945732  
 Tigerline ID Side: L

## Census Tract

1. To check if the site is located in an eligible census tract, locate the Census Tract Name and County.
  - i. Scroll down to the Census Tracts section. Find the NAME, shown in the example below.

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- ii. Scroll down to the Counties section. Find the NAME, shown in the example below.

Census Tracts:

STATE CODE: 53

POP100:

GEOID: 53067010802

CENTLAT: +46.9989374

COUNTY CODE: 067

AREAWATER: 190312

**NAME: Census Tract 108.02**

CENTLON: -122.8947683

TRACT CODE: 010802

AREALAND: 7851517

HU100:

UR:

Counties:

STATE CODE: 53

POP100:

GEOID: 53067

CENTLAT: +46.9295900

COUNTY CODE: 067

AREAWATER: 133627810

**NAME: Thurston County**

CENTLON: -122.8320045

AREALAND: 1871256794

HU100:

UR:

2. Open the SNAP-Ed Census Tract Eligibility Spreadsheet. Go to the Census Tract Eligibility tab.
3. Select the data filter on the column with the county. Search the county NAME as identified in the previous step.
4. Select the data filter on the column with the census tract NAME as identified in the previous step.
5. Check Column D for the percent at or below 199% FPG in this census tract. If it is 50% or more, STOP, the census tract is eligible. The excel has conditional formatting so this cell will appear green if the census tract qualifies.

For example, because the address is in Thurston County, we look at census tract 108.02 and Thurston County. Only 15.49% of people in this census tract have incomes at or below 199% FPG in this census tract. This example does not qualify. The next step is to look at block groups.

GEO_ID	Census Tract	County	Number of qualifying individuals(<199%)	Percent of qualifying individuals (<199%)	Total	Under .50	.50 to .75	1.00 to 1.24	1.25 to 1.49	1.50 to 1.84	1.85 to 1.99	2.00 and over
1400000US53067010802	Census Tract 108.02	Thurston County	641.00	15.49%	4139	69	224	42	77	178	51	3498

Block Group

1. To check if the site is located in an eligible census block group, you'll need to add "&layers=all" to the end of the URL.
  - i. Scroll down the Census Block Groups section. Find the Block Group Number, highlighted in the example below.

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Census Block Groups:

STATE CODE: 53

GEOID: 530670108024

CENTLAT: +46.9853384

COUNTY CODE: 067

AREAWATER: 71829

NAME: Block Group 4

CENTLON: -122.8960403

TRACT CODE: 010802

AREALAND: 2123048

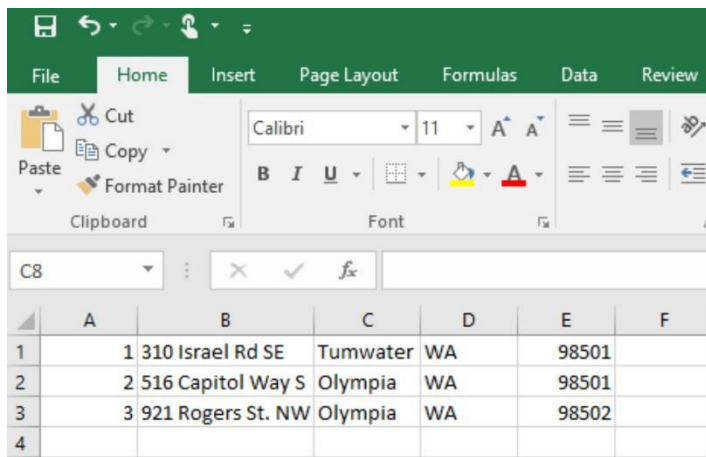
An important note about GEOID: The GEOID depends on the level of the geograhpy considered, which is why you will see multiple GEOIDs of varying lengths in the output from Geocoder. Washington State is GEOID 53, so you'll see that show up in every entry. Next is the county GEOID. In the example, Thurston county is 067. Next is the census tract GEOID, so for this example that is 010802 (remember that the census tract number used in the previous step was 108.02 The next one is the census block, which for this example is 4. The 5 represents the block group, which is the level of income data available on the block group tab.

2. Open the SNAP-Ed Census Tract Eligibility Spreadsheet. Go to the Block Group Eligibility tab.
3. Select the data filter on the column with the GEOID and search the GEOID as identified in the previous step.
4. Check Column E for the percent at or below 199% FPG in this census tract. If it is 50% or more, STOP, the census tract is eligible. The excel has conditional formatting so this cell will appear green if the census tract qualifies.

*Using Census Data to Check Site Eligibility Using Multiples Addresses*

1. Prepare an Excel file with the addresses that you want the Census Tracts and Block Groups for. Be careful not to include enter extra spaces before or after words in cells.
  - Column A: Unique Identifier, you create. Example: For 10 addresses, you could use numbers 1–10.
  - Column B: Street address
  - Column C: City
  - Column D: State
  - Column E: Zip Code

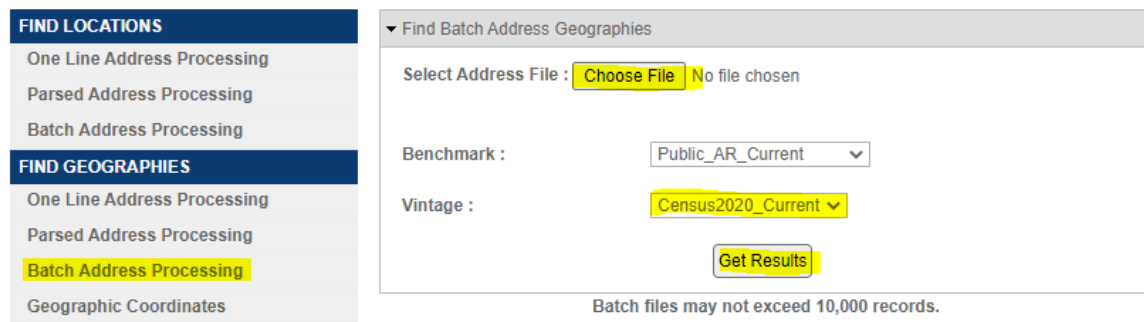
For example:



The screenshot shows the Microsoft Excel interface with the 'Home' tab selected. The ribbon includes options for File, Home, Insert, Page Layout, Formulas, Data, and Review. The 'Clipboard' group shows Cut, Copy, Paste, and Format Painter. The 'Font' group shows Calibri font, size 11, and various formatting options like Bold, Italic, Underline, and text color. The active cell is C8. Below the ribbon is a table with the following data:

	A	B	C	D	E	F
1	1	310 Israel Rd SE	Tumwater	WA	98501	
2	2	516 Capitol Way S	Olympia	WA	98501	
3	3	921 Rogers St. NW	Olympia	WA	98502	
4						

2. Go to [geocoding.geo.census.gov](https://geocoding.geo.census.gov)
3. Under "FIND GEOGRAPHIES USING..." OPTION, select Address Batch.
4. On the next screen, across from Select Address File: select Choose File. For 'Vintage' Dropdown, select 'Census2020\_Current'. See highlights below:



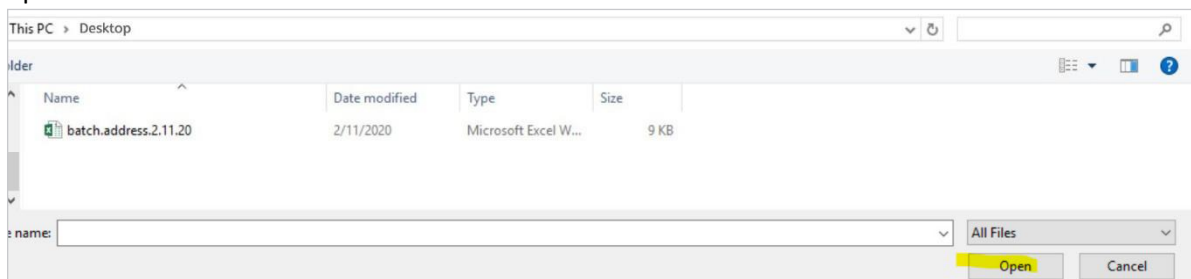
The screenshot shows the 'Find Batch Address Geographies' web interface. On the left, there is a sidebar with two main sections: 'FIND LOCATIONS' and 'FIND GEOGRAPHIES'. Under 'FIND GEOGRAPHIES', 'Batch Address Processing' is highlighted. The main content area has the following fields:

- Select Address File:** A button labeled 'Choose File' and the text 'No file chosen'.
- Benchmark:** A dropdown menu with 'Public\_AR\_Current' selected.
- Vintage:** A dropdown menu with 'Census2020\_Current' selected.
- Get Results:** A yellow button.

Below the form, there is a note: 'Batch files may not exceed 10,000 records.' and a link: 'Download a sample CSV file here'.

\* Vintage dropdown selection changes over time but must correspond to the income data obtained from the Census Reporter website. Data were recently released from the 2020 census. Make sure that you are using the corresponding data when looking up income data.

5. Navigate on your computer to your Excel batch address file. Select the file. Click on Open to upload it.



6. Click on Get Results (see highlight in #4) and open results in Excel.
7. Verify input address and output address are the same for each address. Column C will say Match and Column D will say Exact. You will see:

A	B	C	D	E	F	G	H	I	J	K	L
RECORD ID NUMBER	INPUT ADDRESS	TIGER ADDRESS RANGE MATCH	TIGER MATCH TYPE	TIGER OUTPUT ADDRESS	INTERPOLATED LONGITUDE AND LATITUDE	TIGERLINE ID	TIGERLINE ID SIDE	STATE CODE	COUNTY CODE	TRACT CODE	BLOCK CODE
1	310 Israel Rd SE, Tumwater, WA, 98501	Match	Exact	310 ISRAEL RD SE, TUMWATER, WA, 98501	-122.90246,46.985397	180945732	L	53	067	010800	5016
2	516 Capitol Way S, Olympia, WA, 98501	Match	Exact	516 CAPITOL WAY S, OLYMPIA, WA, 98501	-122.90152,47.043888	180944104	L	53	067	010100	1054
3	921 Rogers St. NW, Olympia, WA, 98502	Match	Exact	921 ROGERS ST NW, OLYMPIA, WA, 98502	-122.91841,47.052998	180943065	L	53	067	010600	5004

8. If you do not know the county of the address, you may need to look it up using the address or the county code. Next, you can use the tract code to follow the instructions above to determine if the census tract is eligible.

For the address that you want to look up: Create a GEOID number using the coded data in Columns I through K. For example: For 310 Israel Rd. SE Tumwater, WA: I: 53 J: 067 K: 010800 = 53067010800. You can use this GEOID to follow the instructions above to determine if the block group is eligible. The first number of the block code is the block group number.

## Resources

Resources include:

- Eligible site flowchart
- Income data by census tract, census block group, native area, and census designated place
- SNAP and WIC approved retailer list
- Free and reduced-price lunch eligibility spreadsheet (in development)
- Childcare (in development)
- Qualifying location form (in development)

## Direct Education

IAs should ensure LIAs are selecting approved curricula, including for virtual education, from the [WA SNAP-Ed FFY2022 Curriculum List](#) or the [FFY22 Virtual Education Curriculum List](#), depending on the delivery method for indirect education.

A direct education series should take place completely within one federal fiscal year. It is strongly discouraged for a direct education series to start in one federal fiscal year and end in another. LIAs must have prior approval from the IA, evaluation, and state agency prior to implementing any series that spans two federal fiscal years.

## SNAP Promotion

### SNAP-Ed Guidance

Per the 7 CFR 277.4 (b)(5), recruitment activities designed to persuade an individual to apply for SNAP benefits; television, radio, or billboard advertisements that are designed to promote SNAP benefits and enrollment; or agreements with foreign governments designed to promote SNAP benefits and enrollment are prohibited.

For SNAP-Ed, this means that information regarding SNAP enrollment should not be placed on any billboard, radio, television or video recording that may be part of a SNAP-Ed intervention. Basic SNAP Information or a link to SNAP information may be placed on handouts, brochures, recipes, etc. only.



## SNAP Promotion Rule

7 CFR Parts 251, 271, 272 and 277

Link: <https://www.federalregister.gov/documents/2016/12/20/2016-30621/supplemental-nutrition-assistance-program-promotion>

SNAP-Ed Note: The following section includes information from the SNAP Promotion final rule. Any activity conducted with SNAP-Ed funds must support SNAP-Ed's goal. Therefore, some of examples allowed under SNAP Promotion Rule may not be allowable under SNAP-Ed. Anything that is not allowed under the SNAP Promotion Rule is also not allowed under SNAP-Ed. See, *WA DSHS Interpretation of SNAP-Ed and Unallowable Activities*, for specific SNAP-Ed examples.

Per the SNAP Promotion Rule, SNAP program funds cannot support:

- (1) Recruitment activities designed to persuade an individual to apply for SNAP benefits;
- (2) Television, radio, or billboard advertisements that are designed to promote SNAP benefits and enrollment; or
- (3) Agreements with foreign governments designed to promote SNAP benefits and enrollment are prohibited.

### Recruitment Activities

- Persuasive practices constitute coercing or pressuring an individual to apply, or providing incentives to fill out an application.
- Communicating factual information pertaining to SNAP is not a recruitment activity designed to persuade an individual to apply for SNAP benefits.
- Communicating factual information so that an individual can make an informed choice pertaining to SNAP is not a recruitment activity designed to persuade an individual to apply for SNAP benefits. As a result, prohibited recruitment activities would not include providing accurate program information to dispel misinformation, answering questions about SNAP, providing assistance in filling out forms or obtaining verification documents, or providing basic information about SNAP availability, application procedures, eligibility requirements, and the benefits of the program, as specifically permitted by Section 11(e)(1) of the FNA.

*Example: A worker funded by SNAP funds is staffing a SNAP informational table at a food pantry. A food pantry visitor comes to the table, but soon replies that he is not interested in learning more. The worker may ask a follow-up question about why the visitor is not interested in learning more. If the visitor's answer demonstrates a lack of accurate information about SNAP, the worker may correct the misunderstanding, thus helping the visitor make an informed choice about applying. However, if the visitor responds to the follow-up questions with a further expression of disinterest, continuing to question the visitor would be pressuring the individual to apply and therefore constitutes a persuasive practice.*

- Providing individuals with information about the ancillary benefits of applying for SNAP is not an incentive or a recruitment activity designed to persuade. Providing factual information to an

individual about the benefits of SNAP, such as that SNAP participation may make a household's children eligible for the National School Lunch Program, is a permissible sharing of factual information, per the regulations on allowable informational activities in 7 CFR 272.5(c).

#### **Television, radio, or billboard advertisements**

- This provision does not apply to Disaster SNAP.
- This provision is not intended to prohibit Federal funding for large signs used for informational purposes at health fairs, farmers markets, and other venues where most attendees are on foot.
- Advertising where SNAP benefits are accepted does not constitute promoting SNAP benefits and enrollment.
- This provision does not restrict retailers, such as farmers markets, from using these methods to provide information about where SNAP benefits are accepted. Restriction on the use of Federal funds for radio, television, and billboard advertising does not restrict retailers from using these methods to provide factual information about their FNS-approved programs for currently enrolled SNAP households, such as fruits and vegetables incentive programs.

#### **Social Media**

The use of social media like Twitter, Facebook, YouTube, or other internet sites was not prohibited under Agricultural Act of 2014 (the Farm Bill), so long as the content was not recruitment activity designed to persuade an individual to apply for SNAP benefits through coercion, pressure, or incentives.

### **WA DSHS Interpretation of SNAP-Ed Allowable and Unallowable Activities**

#### **Allowable**

- Provide Basic Food/SNAP brochure during SNAP-Ed in-person events or basic information about Basic Food/SNAP or a link to SNAP information on SNAP-Ed handouts, brochures, recipes, etc.
- Conduct farmers market tours that show SNAP/WIC participants how to use their benefits, including SNAP Market Match or WIC fruit and vegetable vouchers, at the market.
- Respond to questions about Basic Food by providing basic information and contact information for local CSO or link to learn more.
- Coordinate with Basic Food Outreach community contractors on SNAP-Ed programming.
- Post basic information about SNAP/Basic Food on website or social media platform.
- Television, radio or billboard advertisements that focus on healthy eating and active living as part of a social marketing campaign.
- Provide referrals to SNAP for low-income non-participants to access SNAP benefits, as appropriate.
- Social marketing to promote nutrition assistance sites.

#### **Unallowable**

- Provide an incentive for participant to sign up for SNAP. Note that incentive items that comply with SNAP-Ed cost rules can be provided as long as the incentive item is not contingent on whether the person signs up for benefits.
- Driving participants to CSO offices to sign up for benefits.

Update includes: Active Implementing Agencies, Workgroups, Program Contacts

- Television, radio or billboard advertisements that are designed to promote SNAP benefits and enrollment (see exceptions for Disaster SNAP).
- Television and radio announcements/advertisements that contain messages about SNAP, its benefits, and how to apply.
- Assist in filling out an application for SNAP.

## Photographs and Release Forms

To respect the privacy of participants, identifying photographs of participants should not be used on publicly-facing documents and resources, including but not limited to: websites, reports, fact sheets, and social media. Because SNAP-Ed is program for people who are low-income, including a photo of a SNAP-Ed participants identifies them as potentially eligible for SNAP-Ed. It is acceptable to include non-identifying photos of participants, such as hands in a garden or preparing food. Stock images are acceptable.

Photo release forms may still be appropriate for capturing photos of SNAP-Ed staff and partners. Agencies should use their own photo release forms and have completed forms on file, as required in record-keeping policies.

## Social Media Guidelines

Implementing Agencies are expected to disseminate and follow the [Washington State SNAP-Ed Social Media Guidelines](#).

## Evaluation Guidelines

Implementing Agencies are expected to disseminate and follow the [Washington SNAP-Ed Evaluation Guidance for Federal Fiscal Year 2022](#).

## Contract Requirements

## DSHS SNAP-Ed Contacts

Name	Position	Contact Information
Position Unfilled	Program Manager	
Tara McGinty	Program Consultant	<a href="mailto:Tara.Mcginty@dshs.wa.gov">Tara.Mcginty@dshs.wa.gov</a>
Angela Aikins	Food Programs and Policy Administrator	360.688-4951 <a href="mailto:Angela.Aikins@dshs.wa.gov">Angela.Aikins@dshs.wa.gov</a>
Cedrick Aquino	SNAP-Ed Fiscal Grants Manager	<a href="mailto:Cedrick.Aquino1@dshs.wa.gov">Cedrick.Aquino1@dshs.wa.gov</a>

Tameka Maxwell	Federal Accounting and Reporting Manager	360.725.4597 <a href="mailto:Tameka.Maxwell@dshs.wa.gov">Tameka.Maxwell@dshs.wa.gov</a>
Caleb Clark	Contracts Officer	360.480.6936 <a href="mailto:caleb.clark@dshs.wa.gov">caleb.clark@dshs.wa.gov</a>

## Instructions for Filling out the Contractor Workbook

1. Add the line-item expenses to the “Base Contract Request” column. You can add additional lines as needed. Base contract requests represent costs that are expected to be covered 100% by the new federal allocation.
2. Add the supplemental request in the Supplemental Request Column. All contractors may make supplemental budget request, which are line items that will be paid using Washington State’s underspent funds from the prior year. DSHS determines how to re-allocate underspent funds from the previous year. DSHS will review supplemental budget requests and notify contractors whether supplemental budgets are approved at the DSHS level and will be sent to FNS for approval. DSHS will consult with contractors if not all line items can be funded prior to submitting budgets to FNS. See examples below.

Note: If the supplemental budget request includes increasing an employee's FTE percentage, it may be easier to submit a revised staffing tab. However, DSHS advises that approval of a supplemental budget item only applies to that federal fiscal year, so the additional funding level may not be available to maintain that FTE the following year.

FFY 22 SNAP-Ed Travel Summary								
In-State & Out-of-State Travel								
Purpose	Justification of Need and Detail	Attendee Learning Objective(s)	City/State	Base Contract Request	Supplemental Budget Request	Amendment 1	Amendment 2	Total Costs* (FFY 21)
LT Quarterly Meeting				\$200	\$0	\$0	\$0	\$200
SNEB				\$0	\$1,000	\$0	\$0	\$1,000
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0	\$0
TOTAL Travel				\$200	\$1,000	\$0	\$0	\$1,200

Figure 1 Example of requesting new line item in supplemental budget request. In this case, the request includes travel to an LT quarterly meeting and, if funds are available, travel to SNEB.

Update includes: Active Implementing Agencies, Workgroups, Program Contacts

FFY 22 Materials and Program Supplies Additional Items can be added below to Other Materials.						
Category	Itemized Description of Goods	Base Contract Request	Supplemental Budget Request	Amendment 1	Amendment 2	Total Costs
NERI	Grocery Bags	\$1,000	\$500	\$0	\$0	\$1,500
		\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0

Figure 2 Example of requesting increase to existing line item in supplemental budget request. In this case, the minimum request is \$1,000 for grocery bags and an additional \$500 if funds are available.

- During mid-year amendments, contractors can change line items by adjusting the amendment column(s). More columns can be added for multiple mid-year amendments. All amendment columns should be blank at the beginning of the year.

## Indirect Costs

If an organization includes an indirect costs charge in its contractor workbook, it must provide to DSHS an indirect rate agreement letter, as approved by a cognizant agency. Indirect agreement letters are due upon submission of the contractor workbook and plan in July.

Depending on the nature of direct costs included in an indirect rate agreement letter, DSHS may request more detailed information about the indirect rate agreement letter, including a cost allocation plan, which provides more information about what costs are included in the indirect rate.

If a contractor's indirect rate changes during a contract year, the contractor should notify DSHS immediately and provide updated documentation.

FNS may request documentation in support of the submitted indirect cost rate. More information about indirect costs can be found in the financial and cost policy section of the SNAP-Ed Plan Guidance.

## Subcontractor Approval

Contractors must have written approval from DSHS before subcontracting SNAP-Ed funds. To receive approval, contractors must fill out the Subcontractor Approval Checklist. Contractors must submit a checklist prior to the start of a new contract and submit a revised checklist if the contractor intends to contract with a new organization or agency that was not included on the original checklist.

### Answers to Common Subcontractor Checklist Questions

- Are contractors required to submit, along with the subcontractor checklist, a confidentiality and data security statement? Does DSHS have sample wording that should be used?

Along with the completed subcontractor checklist, contractors are required to submit a draft sample contract that should include language about confidentiality and data security statement that meets the requirement in the DSHS contract. No additional forms are required.

- Are contractors required to submit documentation of background checks for subcontractors?

Contractors should establish a process, including record retention, for reviewing subcontractor background checks equivalent to that described in the DSHS contract. DSHS may monitor the process and documentation during management evaluations.

3. Do contractors (i.e., IAs) need copies of the background checks?

No, it is sufficient for a subcontracting agency to notify contractor (you) with staff names who have a successful background check, verifying that nothing matches the DSHS Secretary's list of Crimes and Negative Actions, and the date on which the check was performed.

4. Does a new background check need to be completed for subcontractors who we are currently working with and already have a background check on file?

Background are required every two years for staff who will have unsupervised access to children or vulnerable adults served under the Contract (see second bullet on subcontractor checklist).

5. Are contractors required to submit, along with the subcontractor checklist, certification of insurance for proposed subcontract(s)?

No, but certification of insurance must be available for monitoring evaluations. The sample contract should include minimum insurance requirements.

6. Are contractors required to submit a subcontracting checklist if subcontractors (LIAs) consider additional or different sub-sub-recipients and sub-contracts through their own organizational contracting practices?

A subcontractor checklist is not required for sub-subcontractors (i.e., LIAs subcontracting SNAP-Ed funds). The FFY21–23 Plan should include all proposed sub-subcontractors. Implementing Agencies may have subcontracting requirements that must be followed.

If a DSHS contractor is proposing a new subcontractor during the federal fiscal year that was not included on the subcontractor checklist, a new subcontractor checklist is required. If during the federal fiscal year an LIA would like to work with a new sub-subcontractor, DSHS must be notified ahead of time through a plan amendment.

7. Are contractors required to submit, along with the subcontractor checklist, additional verification that they've held their subcontractors to their performance requirements?

No, Implementing Agencies are responsible for ensuring that subcontractors meet performance requirements as described in the subcontract through their subcontractor monitoring processes.

8. Insurance: If subcontractors do not have an aggregate of \$2M, then are contractors not allowed to contract with them?

It depends. DSHS requires its qualifying contractors to meet insurance requirements as described in the contract. Any WA state agency, department or office, including all state

community colleges and state universities, except for the University of Washington, is excluded from DSHS insurance requirements.

If a subcontractor did not meet the IA's insurance requirements, the IA could follow its own internal review process to determine if contracting is allowed, including through a waiver.

9. What does it mean that "The State of Washington, DSHS, its elected and appointed officials, agents, and employees shall be named as additional insureds."?

The party with insurance would request their insurance provider to name DSHS as an additional insured party on a Certificate of Insurance (Proof of Insurance). IA contractors would need to name IA as an additional insured party on their Certificate of Insurance.

10. Confidentiality: Should contractors incorporate the specifics from the Interlocal agreement into our contract? Should subcontractors adopt the contractors'/DSHS' confidentiality policy?

Subcontractors do not need to adopt DSHS' or IA's policy, but do need to meet, at a minimum, confidentiality requirements as described in the IA/DSHS contract.

## Plan and Budget Amendments

### FNS Requirements for Plan Amendments

"Per 7 CFR 272.2(f) State agencies must submit amendments of approved Plans to FNS for prior approval, with supporting documentation, throughout the fiscal year, but no later than May 1 of the current fiscal year. Plan amendments are necessary whenever:

- The revision indicates the need for additional Federal funding.
- The State SNAP-Ed program budget exceeds \$100,000 and there is a change in activities that results in a change of 5 percent or greater of the total program budget.
- An implementing agency SNAP-Ed program budget exceeds \$100,000 and there is a change in activities that results in a change of 5 percent or greater of the total [Implementing Agency] program budget.
  - This includes State reallocations of funds among implementing agencies and implementing agency reallocation of funds among subcontractors.
- Budget revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs.

Examples of changes that may require a plan amendment may include, but are not limited to, the incorporation of new environmental or public health approaches as well as significant expansion or reduction of activities. FNS recommends that States consult with their respective Regional Offices for technical assistance prior to submitting an amendment.

In amendments, States should indicate whether the request is for a new or revised project and whether funds will come from unobligated previous FY funds (carry-over) or from a project activity that has been revised. States should provide a full description of the new or revised activities,

providing similar information as for a new project. Submit amendments electronically to the FNS Regional Office.”<sup>1</sup>

For any amendments that meet the above criteria, please notify DSHS by April 1.

### Additional DSHS Requirements for No-cost Amendments

If the criteria listed above are not met for a plan amendment, please submit a written request to DSHS for the following situations of no-cost amendments:

- Funds of any amount will be moved from one region to another (only relevant for DOH IA);
- Funds that amount to 10%\* or more of an individual line item will be transferred from one budget to another (including but not limited to transfers from provider to provider and administration to or from provider); or
- Funds that amount to 10%\* or more of an individual line item will be moved to a different line item AND are a value of \$10,000 or more.

*\*For any budget update <10% of an individual line item, please notify DSHS and provide the updated budget(s).*

## Invoices

DSHS contracted providers must elect either a monthly or quarterly billing cycle and submit their completed invoices by due dates outlined in both the contract and the *SNAP-Ed Leadership Team Planning Calendar*. Submit invoices to DSHS SNAP-Ed program staff directly at [tara.mcginty@dshs.wa.gov](mailto:tara.mcginty@dshs.wa.gov).

**DSHS considers payments timely if made within (30 days) after the receipt and acceptance of a properly completed invoice, following any necessary corrections requested by DSHS.**

Invoice packets must include the following to be considered complete:

1. **State Form A-19 Invoice Voucher (Provided by Fiscal at the beginning of each FFY).** Each A-19 must be complete and including the following information:
  - a. DSHS Contract Number
  - b. Contract Term
  - c. Billing Period (Either Monthly or Quarterly)
  - d. Signatures by the agency or agency contractor
  - e. Itemized list of all charges

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<sup>1</sup> Section 2: Writing Your SNAP-Ed Plan and Annual Report, Page 60



Update includes: Active Implementing Agencies, Workgroups, Program Contacts

- i. All costs must add up correctly and match the additional cost details documentation

## 2. Detailed Cost Documentation

All invoice packets must include detailed supporting documentation that reflects the costs listed on the A-19, including (but is not limited to) goods, services, time and efforts, and other approved categories in the **contractor's budget**. Supporting documentation must be clear and organized. Any forms, pages, or other sheets must not be missing or illegible. Sufficient backup documentation includes:

- **Salaries and Benefits:** Payroll reports must show each staff person whose salary was paid with SNAP-Ed funds. Staff listed in payroll reports must be consistent with the approved budget. Documentation of staff time and effort and/or timesheets should be kept on file per SNAP-Ed record retention policies and available to DSHS during annual management evaluations or upon request.
- **Sub-Contracts/Grants/Agreements:** SNAP-Ed contractors approved to subcontract must include subcontractor A-19s for the billing period. While backup documentation for subcontractor A-19s are not required, DSHS may request them during the fiscal management evaluation. Contractors must have a process in place to review backup documentation included with subcontractor invoices to ensure allowable, reasonable, and necessary costs. DSHS will request a description of this process during annual management evaluations.
- **Non-Capital Equipment, Materials, Program Supplies & Other Goods and Services:** Please include a description of purchase such that the DSHS can connect the purchase with a budget line item; determine if the cost is allowable; and whether the item or service is necessary to SNAP-Ed. Please note that receipts are not required, but should be available upon request. Any submitted receipts and proof of purchases must clearly outline the item or service that is necessary to SNAP-Ed.

Note: If funds are used to register for an approved conference, please include a copy of the registration confirmation and the date(s) of the conference. For more information about conferences, see Costs That Require Prior Approval from FNS.

- **Travel:** Travel costs must adhere to the program's [federal and state per diem rates](#). For more information about approved travel, see Costs That Require Prior Approval from FNS.
- **Administrative:** Documentation should demonstrate costs are not included in indirect charges and be consistent with budget.
- **Building Space:** Documentation should demonstrate costs are not included in indirect charges and be consistent with budget.
- **Maintenance/Repair:** Documentation should demonstrate costs are not included in indirect charges and be consistent with budget.

- **Capital Equipment:** Because it is rare to purchase capital equipment with SNAP-Ed funds, FNS requires prior approval. Include documentation of FNS and DSHS approval with the invoice.

DSHS will thoroughly review documentation to ensure that SNAP-Ed funds are correctly billed and may request additional information, corrections, or clarifications if the provided documentation is insufficient. DSHS will communicate with the contractor via email and will not consider invoices timely and ready for payment until all requests are addressed.

Please note that during SNAP-Ed fiscal management evaluations, DSHS may request invoices from designated periods of time, including additional detailed documentation that supports the allowable costs associated with goods and services, time and efforts, and other costs.

## Civil Rights Training

All SNAP-Ed staff are required to take civil rights training annually. A link to an acceptable training is posted on the [Health Equity and SNAP-Ed page](#) on the provider site. IAs must have a system of tracking completion of the training annually and provide information to DSHS during annual monitoring.

## Costs That Require Prior Approval from FNS

- Cell Phones
- Tablets
- Staff salaries to establish and maintain community food gardens, such as in low-income housing projects or schools may be allowable but should be submitted to FNS for prior approval
- Capital Equipment, which is equipment valued at more than \$5,000 per item

## Conferences and Travel

Registration for any conferences or large meetings must be approved by DSHS prior to registration. DSHS will review requests annually during the state plan and budget update process in July and August and other registration requests throughout the year. Requests should be completed through the Conference Request Form.

**Question:** Can current SNAP-Ed funds be used to pay for early bird conference registration for the next year?

**Answer:** Any discussion of obligating for future years' inevitably leads to the question of year-end spending. As a fiscal year draws to a close, Federal awards are often subject to last minute obligations. The legal principle is that "An appropriation should not be used for the purchase of an article not necessary for the use of a fiscal year in which ordered merely in order to use up such appropriation. This would be a plain violation of the law." 8 Comp. Dec. 346, 348 (1901). Where an obligation is made toward the end of a fiscal year and it is clear from the facts and circumstances that the need relates to the following fiscal year, performance period integrity has been violated. The obligation is not a proper charge against the earlier appropriation, but must be charged against the following year's funds. However, where a bona fide need exists the obligation may occur in one fiscal year with the activity and subsequent expenditure to occur in the next fiscal year. If the conference

registration deadline dictates that funds must be paid in August or September of one fiscal year to ensure commitment of the Conference in October of the next fiscal year, or if the cost is reduced when payment is made in the prior fiscal year (early bird conference registration), then a bona fide need exists to obligate the funds in one fiscal year and attend the conference in the subsequent fiscal year.

Also, we consider this not to be an issue of pre-award costs, rather it's a period performance integrity question.

## Equipment Ownership

If a SNAP-Ed contractor/subcontractor will not continue to contract for SNAP-Ed services, determine which of the following circumstances applies to equipment or supply inventory purchased with SNAP-Ed funds:

- If any capital equipment was purchased by contractor/subcontractor with SNAP-Ed funds, see §200.313 Equipment.  
Note that the "State agency must obtain prior Federal approval before procuring or requesting payment for equipment valued at more than \$5,000 per item" (FFY21 Guidance page 72).  
"Inventory records must be maintained for equipment that is paid for with Federal funds. A physical inventory is required, and the results must be reconciled with property records, at least once every 2 years or more often" (FFY21 Guidance page 72). Therefore, capital equipment is not common for SNAP-Ed.
- If contractor/subcontractor has an inventory of equipment purchased with SNAP-Ed funds that exceeds \$5,000 in aggregate value, the "title to supplies will vest in the non-Federal entity upon acquisition" and the contractor/subcontractor must:
  - Use the supplies for another federal award and notify the awarding agency; OR
  - "Retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal Government for its share" (§200.314). See §200.313 Equipment, paragraph (e)(2) for more information on compensating the Federal Government for its share.
- If contractor/subcontractor has an inventory of equipment purchased with SNAP-Ed funds that is \$5,000 or less in aggregate value, the "title to supplies will vest in the non-Federal entity upon acquisition" (§200.314).

## Definitions

### **§200.20 Computing devices.**

*Computing devices* means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information. See also §§200.94 Supplies and 200.58 Information technology systems.

**SNAP-Ed examples:**

- Computers
- Tablets
- Projectors

**§200.33 Equipment.**

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See also §§200.12 Capital assets, 200.20 Computing devices, 200.48 General purpose equipment, 200.58 Information technology systems, 200.89 Special purpose equipment, and 200.94 Supplies.

**§200.48 General purpose equipment.**

*General purpose equipment* means equipment which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles. See also Equipment and Special Purpose Equipment.

**SNAP-Ed examples:**

Office equipment, supplies, postage, and duplication costs that are necessary to carry out the project's objectives.

- Chairs
- Desks
- Projectors

**§200.59 Intangible property.**

Intangible property means property having no physical existence, such as trademarks, copyrights, patents and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership (whether the property is tangible or intangible).

**SNAP-Ed examples:**

- Licensed curricula, lessons, teaching materials

**§200.78 Personal property.**

*Personal property* means property other than real property. It may be tangible, having physical existence, or intangible.

**§200.85 Real property.**

*Real property* means land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment.

**§200.94 Supplies.**

*Supplies* means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. See also §§200.20 Computing devices and 200.33 Equipment.

Guidance: Non-capital Equipment 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 nonexpendable equipment should be done in accordance with State or local property management requirements.

**SNAP-Ed Examples**

- Cooking equipment
- Includes computing devices and accessories

**Property Standards****§200.313 Equipment.**

See also §200.439 Equipment and other capital expenditures.

(a) *Title.* Subject to the obligations and conditions set forth in this section, title to equipment acquired under a Federal award will vest upon acquisition in the non-Federal entity. Unless a statute specifically authorizes the Federal agency to vest title in the non-Federal entity without further obligation to the Federal Government, and the Federal agency elects to do so, the title must be a conditional title. Title must vest in the non-Federal entity subject to the following conditions:

- (1) Use the equipment for the authorized purposes of the project during the period of performance, or until the property is no longer needed for the purposes of the project.
- (2) Not encumber the property without approval of the Federal awarding agency or pass-through entity.
- (3) Use and dispose of the property in accordance with paragraphs (b), (c) and (e) of this section.

(b) A state must use, manage and dispose of equipment acquired under a Federal award by the state in accordance with state laws and procedures. Other non-Federal entities must follow paragraphs (c) through (e) of this section.

(c) *Use.*

- (1) Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported

by the Federal award, and the non-Federal entity must not encumber the property without prior approval of the Federal awarding agency. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority:

- (i) Activities under a Federal award from the Federal awarding agency which funded the original program or project, then
  - (ii) Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.
- (2) During the time that equipment is used on the project or program for which it was acquired, the non-Federal entity must also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by Federal awarding agency that financed the equipment and second preference must be given to programs or projects under Federal awards from other Federal awarding agencies. Use for non-federally-funded programs or projects is also permissible. User fees should be considered if appropriate.
  - (3) Notwithstanding the encouragement in §200.307 Program income to earn program income, the non-Federal entity must not use equipment acquired with the Federal award to provide services for a fee that is less than private companies charge for equivalent services unless specifically authorized by Federal statute for as long as the Federal Government retains an interest in the equipment.
  - (4) When acquiring replacement equipment, the non-Federal entity may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

(d) *Management requirements.* Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a Federal award, until disposition takes place will, as a minimum, meet the following requirements:

- (1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.
- (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- (3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.
- (4) Adequate maintenance procedures must be developed to keep the property in good condition.
- (5) If the non-Federal entity is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

(e) *Disposition*. When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

- (1) Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency.
- (2) Except as provided in §200.312 Federally-owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.
- (3) The non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity must be entitled to compensation for its attributable percentage of the current fair market value of the property.
- (4) In cases where a non-Federal entity fails to take appropriate disposition actions, the Federal awarding agency may direct the non-Federal entity to take disposition actions.

#### **§200.314 Supplies.**

See also §200.453 Materials and supplies costs, including costs of computing devices.

(a) Title to supplies will vest in the non-Federal entity upon acquisition. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other Federal award, the non-Federal entity must retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal Government for its share. The amount of compensation must be computed in the same manner as for equipment. See §200.313 Equipment, paragraph (e)(2) for the calculation methodology.

**§200.313 Equipment, paragraph (e)(2)**

Except as provided in §200.312 Federally-owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.

(b) As long as the Federal Government retains an interest in the supplies, the non-Federal entity must not use supplies acquired under a Federal award to provide services to other organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute.

## Management Evaluations

### Overview

The Supplemental Nutrition Assistance Education (SNAP-Ed) Program aims to improve the likelihood that persons eligible for SNAP will make healthy food choices within a limited budget and choose active lifestyles consistent with the current United States Department of Agriculture (USDA) food guidance, including the *Dietary Guidelines for Americans*. The USDA Food and Nutrition Service (FNS) grants funds to Washington State Department of Social and Health Services (DSHS) each year to administer the SNAP-Ed program. As the SNAP-Ed state agency, DSHS is responsible for maintaining:

- Administrative control of the SNAP-Ed grant;
- Integrity of grant funds; and
- Program effectiveness.

FNS requires DSHS to monitor program activities by conducting annual management evaluations (MEs) and fiscal reviews on all contracted parties. The purpose of annual MEs is to:

- Identify regulatory deficiencies and vulnerabilities in the administration of SNAP-Ed among Implementing Agency (IA), subcontractor (including providers or local implementing agencies), and statewide initiatives (SWI);
- Improve program operations, expand program reach, increase effectiveness, develop new nutrition education and obesity prevention strategies, and provide IAs and their subcontractors with technical assistance; and
- Recognize program excellence and best practices.

DSHS uses the following to determine compliance with federal regulations:

- Interviews
- Staff Presentations



- Program Observations
- Public Health Approaches Review/Observation/Analysis
- Case File/Documentation Reviews
- System Analysis

DSHS reserves the right to update the ME guide at any time to ensure federal and state requirements are met.

## Process

### Planning

1. DSHS proposes dates for the on-site review period in the SNAP-Ed Planning Calendar, which is incorporated by reference in each contract and sent to contractors prior to the start of each the federal fiscal year. DSHS monitors all SNAP-Ed contractors annually. DSHS works with contractors to finalize dates based on programming availability.
2. DSHS selects subcontractors to review (if applicable). DSHS considers the following factors when selecting subcontractors to review:
  - a. Amount of expenditures;
  - b. Rate of increase in expenditures from one FFY to the next;
  - c. Known or suspected difficulties in program administration or operation;
  - d. Length of time since SNAP-Ed services were last reviewed by the IA; and
  - e. Unspent funds from previous FFY (high percentage of carryover in relation to total SNAP-Ed funding).
3. DSHS sends ME entrance letter and questionnaire to contractor within 60 days of scheduled on-site review.
4. Contractor provides a schedule of existing SNAP-Ed programming that will take place during the on-site review period. Activities should not be scheduled for the purpose of the on-site review. DSHS and the contractor may work together to adjust the dates of the on-site review based on scheduled programming and to accommodate travel time.

If DSHS intends to observe more than one nutrition education activity, the contractor should confirm different nutrition educators will present them; ensuring as many educators are observed as possible. DSHS will review the schedule provided by the contractor and notify the contractor of the nutrition education activities chosen to observe.

DSHS may select subcontractors that only implement policy, systems, or environmental (PSE) interventions. Monitoring for these subcontractors may include attending a partnership meeting, visiting a site where a PSE intervention was implemented, or the presentation by the subcontractor sharing an overview of its PSE work.

Note that contractors with permission to subcontract are responsible for monitoring their

subcontractors. DSHS monitors subcontractors to observe SNAP-Ed programming as a whole, but the ME is intended primarily to monitor DSHS contractors.

5. Contractor drafts an agenda for DSHS to review (see ME template document). DSHS will consider the length of time at each site, travel time to different sites, as well as the individual needs of the contractor and subcontractors (if applicable). Please note an on-site ME schedule should include, at a minimum, the following:
  - a. Program Overview Discussion(s):
    - i. One recommended approach to leading a program discussion is to begin with a presentation of the contractor's SNAP-Ed programming at the entrance meeting. Please limit the time allotted to ensure time for follow-up Q&A, depending on the participants in the presentation.
  - b. SNAP-Ed Activity Observation(s):
    - i. A review should include site visits to SNAP-Ed service sites to observe SNAP-Ed activities. The number of site visits may vary depending on the region.
    - ii. Note that for statewide initiatives, DSHS may observe a training, meeting, or other event for its on-site review.
    - iii. DSHS recommends scheduling a program discussion for each subcontractor up for review.
6. Contractor completes the program questionnaire (see Templates B and C) and submits to DSHS prior to the entrance meeting.
7. DSHS will host a pre-review conference call to ensure the contractor and subcontractors fully understand the requested documentation, expectations for the on-site review, and schedule. DSHS will make any required adjustments to the agenda and provide clarity on logistics and expectations (e.g., does the SNAP-Ed site restrict the number or type of visitors?). The pre-review call may be done as part of the contractor's monthly check-in.

### On-Site Program Review

1. **Entrance Meeting:** The contractor hosts an entrance meeting. The contractor should arrange for meeting space and a conference call line. The ME Entrance meeting will include:
  - a. Staff introductions
  - b. Overview of the purpose of the SNAP-Ed ME (DSHS)
  - c. Explanation of the post-review process and timeline (e.g., the final ME report, findings vs. observations vs. noteworthy initiatives, and corrective action response) (DSHS)
  - d. Agenda Overview (Contractor)

- e. **Program Overview (Contractor)** The contractor may choose to use the entrance meeting to address items in the monitoring questionnaire and make the presentation available to DSHS for review following the on-site review.
2. **Conduct On-site Program Review:** DSHS will use site observation and interview tools (see Templates F–I).
3. **Exit Meeting:** DSHS will share the preliminary results of the ME with contractor and subcontractor agency staff during the exit meeting.

## Fiscal Review

The DSHS Fiscal Accounting Manager will conduct the fiscal integrity review. Unless notified otherwise, fiscal reviews will be conducted on site (see section on desk reviews below). Fiscal integrity review standard procedures include:

- Ensuring receipt of copies of all requested fiscal documentation from the ME entrance notice;
- Scheduling at least one hour for a discussion with the contractor’s SNAP-Ed fiscal staff to review the questions in the fiscal questionnaire;
- Reserving a room for the fiscal review team member(s) to review documents and discuss further in-depth issues with the contractor’s SNAP-Ed fiscal staff;
- Discussing the fiscal questionnaire; and
- Reviewing documents provided during the review while on-site (including receipts) for an abbreviated fiscal review.

If time permits, other optional activities to include in the ME schedule include:

- Additional SNAP-Ed activity observations;
- Subcontractor presentations and/or site-visits;
- Topic specific technical assistance discussions; and
- Roundtable discussion for SNAP-Ed stakeholders.

The rules for SNAP-Ed fiscal operations are in the SNAP-Ed Plan Guidance:

- OMB Guidance:
  - 2 CFR 200 Subpart D (Post Federal Award Requirements): administrative requirements for Federal grant programs as applicable to SNAP-Ed State and implementing agencies and subcontractors.
  - 2 CFR 200 Subpart E (Cost Principles): cost principles for Federal grant programs as applicable to SNAP-Ed State and implementing agencies and subcontractors.
- USDA departmental regulations:
  - 2 CFR 400: adopts Office of Management and Budget (OMB) guidance in parts A through F of 2 CFR 200 as USDA policy and procedure. 2 CFR 400 also provides additional guidance regarding conflict of interest.
  - 2 CFR 416: administrative requirements for State and local governments;
- Program-specific guidance:
  - SNAP regulations at 7 CFR 277

- SNAP-Ed policy memos on the SNAP-Ed Connection at <https://snaped.fns.usda.gov/program-administration/policy-memos>

### Local Implementing Agency Survey

DSHS conducts an annual survey to solicit feedback about the support received from IAs. The survey includes questions about support received, communication practices, and the IA's understanding of regional and local needs. DSHS summarizes the results of the survey in the IA contractor's ME reports.

### Desk Review (alternate option)

In the event an on-site ME cannot be conducted in person or on site, DSHS will assess items on the monitoring checklist through a desk review process in lieu of site visits. When the COVID-19 pandemic prevented DSHS from conducting its scheduled FFY20 on-site reviews, DSHS developed the following process. The desk review will including the following, replacing the on-site program and fiscal review sections described above:

1. Instead of an entrance letter, DSHS will send a desk review notice to contractors. The desk review notice will include:
  - a. SNAP-Ed Contractor Monitoring Questionnaire
  - b. SNAP-Ed Fiscal Questionnaire
  - c. Fiscal Instruction and Document Checklist
  - d. Previous year's Management Evaluation Report
  - e. Previous year's Fiscal Management Evaluation Report
2. In the event that any monitoring can occur virtually, such as virtual meetings, DSHS will work with the contractor to create a modified agenda.
3. The contractor has **30 days** from the date of the notice to complete all sections and submit to DSHS for review.
4. DSHS will review the questionnaire responses to determine program and contract compliance. Compliance is based on the SNAP-Ed FNS Program Guidance, federal and state laws and regulations and contract requirements. In addition to reviewing the responses to the questionnaire, DSHS will also review results from the annual LIA survey (see more information below), quarter reports, and other relevant sources.

### Reporting

1. DSHS issues the ME report to the contractor within **60 days** of the exit meeting if an on-site review is conducted or within **45 days** of the receipt of the completed desk review questionnaire. The report includes DSHS feedback in the form of commendations, recommendations, and findings (if applicable). DSHS may also respond to information shared outside the official ME, including but not limited to monthly check-ins, workgroups, and quarterly reports.

2. If DSHS finds any program non-compliance through the program and/or fiscal review, DSHS will note it in the ME reports as a finding, and the contractor must respond within **60 days** of receipt of the ME report with a Corrective Action Plan (CAP) to address how the non-compliance will be addressed by the contractor. DSHS will monitor CAPs and verify completion. Contractors should notify DSHS when corrective actions are complete, and DSHS will officially close the finding.

DSHS documents contractor performance in the Agency Contracts Database (ACD). Within **90 days** after the contract end date, the Program Manager must check the appropriate box in the ACD Monitoring Section if the Contractor did or did not provide satisfactory performance of the contract requirements. If a finding is determined from the self-assessment, the Program Manager must add documentation and/or comments in the Monitoring, Document Management and/or Comments section(s) of the ACD to support this finding.