



Food and
Nutrition
Service

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Date: April 13, 2020

Subject: Supplemental Nutrition Assistance Program (SNAP)
Questions and Answers, COVID-19, Set #2

To: All State Agency Directors
Supplemental Nutrition Assistance Program

The Food and Nutrition Service (FNS) is grateful for your continued partnership in responding to the COVID-19 pandemic emergency and ensuring SNAP households receive the nutrition assistance they need.

Attached is the second set of questions and answers for SNAP State agencies in response to questions received about State operations and flexibilities available for program administration during this time. This set focuses on issues related to SNAP nutrition education (SNAP-Ed.)

State agencies should contact their respective FNS Regional Offices with any questions.

Sincerely,

Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program

Enclosure

1. Can SNAP-Ed continue implementation of activities during this national emergency?

SNAP-Ed personnel must follow the guidance provided by their State agencies, State and local governments, and institutions. This may include limiting or cancelling activities that require gatherings of people, including direct education classes.

2. Can SNAP-Ed personnel assist with activities for other Federal programs during this national emergency?

Activities and associated costs, including staff time, must be allowable under the authority of 2 CFR § 200.405(c) and (d) in order to be allocated to SNAP-Ed funding. States may receive multiple sources of funding to pay staff that work on nutrition programs. SNAP-Ed funding is limited to work that directly supports SNAP-Ed. However, other funding streams may be used to assist with activities for other Federal programs, assuming doing so is consistent with the purpose of the other funding sources.

3. Can you share examples of allowable SNAP-Ed activities that avoid face-to-face interaction if we are following social distancing guidelines?

Examples include, but are not limited to:

- Utilizing SNAP-Ed social marketing channels to promote nutrition assistance sites.
- Utilizing SNAP-Ed social marketing channels; policy, systems, and environmental change (PSE) activities; and online direct education to promote proper hand washing.
- Providing online activities remotely to participants.
- Engaging in PSE activities that adhere to State, local, and institutional guidance, such as hosting online meetings of PSE intervention partners.
- Developing educational materials.
- Planning for future activities.
- Receiving online training.
- Data entry and analysis.

Please contact your regional SNAP-Ed coordinator if you have questions regarding allowable activities.

4. What activities would be unallowable for SNAP-Ed?

SNAP-Ed funding is limited to work that directly supports SNAP-Ed. Any activity outside of administering SNAP-Ed is considered an unallowable use of SNAP-Ed funding.

Examples of unallowable costs include, but are not limited to:

- Shopping for, preparing, packing, or serving meals or food distributions.
- Cleaning or sanitizing meal service or food distribution sites that do not receive SNAP-Ed services.
- Acting in any capacity as employees of childcare, senior, or community centers or other SNAP-Ed partner organizations that are not the SNAP-Ed staff person's direct employer.

5. How should the State notify FNS of changes to their SNAP-Ed programs during this emergency?

State agencies should remain in contact with their regional coordinator who can help them determine if desired changes will require a plan amendment. If a plan amendment is needed, the State should submit the amendment by May 1, 2020. If this date does not allow sufficient time for a State to submit a plan amendment, the State should work with their regional coordinator to find a mutually agreeable submission date. The Fiscal Year 2020 SNAP-Ed Plan Guidance (pg. 59) clarifies that a plan amendment may be needed when:

- 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 five 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 five percent or greater of the total 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.

6. Will States continue to receive SNAP-Ed funding?

Yes, States will continue to receive funding through established channels.

7. Should States cease paying implementing agencies (specifically subgrantees) that are no longer conducting activities due to emergency response?

States will need to review and continue to honor their Memorandums of Agreement/Understanding with implementing agencies according to the terms negotiated in these agreements. If continued payment is not prohibited by their respective MOA/Us, States may continue to pay subgrantees as they deem appropriate. States should consider the impact that would occur if implementing agencies do not continue to receive SNAP-Ed funds.

In particular, this may impede ability to restart program activities once the emergency has subsided, retain qualified staff, maintain relationships with community partners, and continue data collection and program evaluation activities.

Implementing agencies must also take these impacts into account when considering ceasing payments to subcontractors.

8. Can State and implementing agencies pay staff if they are unable to fulfill their job responsibilities via telework and therefore, need to take leave?

SNAP-Ed funding is 100 percent Federal funding. Payment of staff leave may be appropriate if the following stipulations required per 2 CFR § 200.431(b) are met:

- (1) They are provided under established written leave policies;
- (2) The costs are equitably allocated to all related activities, including Federal awards; and,
- (3) The accounting basis (cash or accrual) selected for costing each type of leave is consistently followed by the non-Federal entity or specified grouping of employees.
 - (i) When a non-Federal entity uses the cash basis of accounting, the cost of leave is recognized in the period that the leave is taken and paid for. Payments for unused leave when an employee retires or terminates employment are allowable in the year of payment.
 - (ii) The accrual basis may be only used for those types of leave for which a liability as defined by GAAP exists when the leave is earned. When a non-Federal entity uses the accrual basis of accounting, allowable leave costs are the lesser of the amount accrued or funded.

9. What should SNAP-Ed State agencies keep in mind when communicating with implementing agencies and subcontractors?

During any emergency, conditions may change frequently and rapidly. State and local health and safety authorities are best positioned to provide guidance, and SNAP-Ed State and local agencies should follow this guidance as it is provided. SNAP-Ed State agencies should communicate changes in guidance as quickly as possible to implementing agencies who should, in turn, quickly share this information with subcontractors and community partners.

10. What are expectations for continuing evaluation of SNAP-Ed program activity?

States should continue to track existing program outputs and outcomes using your current protocols. We recommend that State and implementing agencies also maintain records of how this emergency impacts current activities and outcomes.

11. What resources are available for additional guidance for States and partners implementing SNAP Ed?

The following resources provide additional guidance.

- FNS Program Guidance on Human Pandemic Response:
<https://www.fns.usda.gov/disaster/pandemic>
- SNAP Pandemic Planning Guidelines: <https://fns-prod.azureedge.net/sites/default/files/media/file/SNAP-Pandemic-Planning.pdf>
- Centers for Disease Control and Prevention COVID-19 Guidelines:
<https://www.cdc.gov/coronavirus/2019-ncov/community/index.html>