

SNAP Community Partnership
Policy and Procedure Manual

Federal Fiscal Year 2018 (October 1, 2017 – September 30, 2018)

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# State Agency Contact Information

## Agency Street Address

Arizona Department of Economic Security

Division of Aging and Adult Services

Coordinated Hunger Relief Program

1789 West Jefferson Street, 3rd Floor NW

Phoenix, Arizona 85007 ([map](https://www.google.com/maps/place/1789%2BW%2BJefferson%2BSt%2C%2BPhoenix%2C%2BAZ%2B85007/%4033.446451%2C-112.0997068%2C17z/data%3D%213m1%214b1%214m5%213m4%211s0x872b13d311efa637%3A0x417559651a020b89%218m2%213d33.446451%214d-112.0975181))

## Agency Mailing Address

Arizona Department of Economic Security

Division of Aging and Adult Services

Coordinated Hunger Relief Program

P.O. Box 6123, Mail Drop 6282

Phoenix, AZ 85005

## Hunger Relief Program Contacts

### Hunger Relief Program Manager

Gloria Garcia-Hernandez (acting)

(602) 364-4371

GGarcia-Hernandez@azdes.gov

### Hunger Relief Program Specialist

Joe Wefer

(602) 771-2792

JWefer@azdes.gov

## Website, Email, and Phone

Website: <https://des.az.gov/services/basic-needs/food/coordinated-hunger-relief-program>

Program email: CoordinatedHungerReliefProgram@azdes.gov

Program main phone number: (602) 771-2788

# Definitions of terms and acronyms

Agency An umbrella term used when referring collectively to DES, Contractor, and Partners.

CFR [Code of Federal Regulations](https://www.ecfr.gov/cgi-bin/ECFR?page=browse); defined by the [Federal Register](https://www.federalregister.gov/) as an annual codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government.

Contractor The agency under contract with DES and responsible for local program administration and coordination; the Contractor for the SNAP Outreach program is the Arizona Community Action Association.

DES [Arizona Department of Economic Security](https://des.az.gov); the State agency responsible for State administration of SNAP, SNAP Outreach and several other nutrition, health, safety, employment and financial support programs.

DES/HRP The Department of Economic Security [Coordinated Hunger Relief Program](https://des.az.gov/services/basic-needs/food/coordinated-hunger-relief-program); a work unit within the Division of Aging and Adult Services Community Service Programs responsible for the day-to-day operations involved in the State Administration of SNAP Outreach and two Federal food distribution programs, The Emergency Food Assistance Program (TEFAP) and the Commodity Senior Food Program (CSFP).

Drawdown As applied to the program, the name of the method used to request reimbursement funding from USDA/FNS. DES pulls, or “draws”, funds from USDA/FNS down to a DES account from which the funds are then disbursed as appropriate.

FNS The U.S. Department of Agriculture [Food and Nutrition Service](https://www.fns.usda.gov/); the Federal agency responsible for Federal administration of SNAP and several other nutrition and food distribution programs.

Outreach As subprogram of SNAP designed to inform potentially‑eligible clients of the benefits and steps to SNAP participation, correct misunderstandings, and myths about the program and to broaden program access in vulnerable communities.

Pass-through As applied to the program, the specific route through which DES issues Partner reimbursement dollars. When Partners are due reimbursement, DES draws down the appropriate funding to itself and sends a single payment Contractor. Contractor “passes” the reimbursement amount to Partners through splitting and disbursing the payment without consuming any of the funds.

Partner Also known as a SNAP Community Partner, an agency that has applied for and been accepted as a member of the Partnership.

Partnership The SNAP Community Partnership; a collaborative network of government, community-based and faith-based agencies providing expanded local program access and enrollment education to potentially‑eligible clients throughout Arizona.

Plan The [State of Arizona SNAP Access and Information Plan](#_Attachment_1_–); a document guiding the direction, projects, goals, projected outcomes, evaluation measures and other components of Arizona’s outreach efforts.

PPM This Policy and Procedure Manual.

SNAP [Supplemental Nutrition Assistance Program](https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap) (formerly known as the Food Stamp Program); the largest federal nutrition assistance program, SNAP supports low-income individuals and families by providing funds on an [Electronic Benefits Transaction](https://www.fns.usda.gov/ebt/general-electronic-benefit-transfer-ebt-information) card which are used to increase household food purchasing power and support the good health of vulnerable populations.

T&TA Training and Technical Assistance; the planning, development, delivery and evaluation of activities designed to achieve specific learning objectives, resolve problems and foster the application of innovative approaches to program objectives.

USDA [U.S. Department of Agriculture](https://www.usda.gov/); an executive department of the Federal Government originally authorized on May 15, 1862. The mission of the USDA is to “provide leadership on food, agriculture, natural resources, rural development, nutrition, and related issues based on sound public policy, the best available science, and efficient management.

# Background and Introduction

## About this Manual

The SNAP Community Partnership Policy and Procedure Manual outlines federal and state requirements as related to the coordination of SNAP Community Partner program outreach activity throughout Arizona.

The following references provide primary support for the information contained in the PPM:

* [Title 2 of the CFR](https://www.ecfr.gov/cgi-bin/text-idx?SID=7f301f383737fb39008b06563664077d&mc=true&tpl=/ecfrbrowse/Title02/2tab_02.tpl) (Grants and Agreements)
* [Title 7 of the CFR](https://www.ecfr.gov/cgi-bin/text-idx?SID=7f301f383737fb39008b06563664077d&mc=true&tpl=/ecfrbrowse/Title07/7tab_02.tpl) (Agriculture)
* [USDA/FNS State Outreach Plan Guidance](https://www.fns.usda.gov/snap/state-outreach-plan-guidance)
* [FNS Instruction 113-1 – Civil Rights Compliance and Enforcement](https://www.fns.usda.gov/civil-rights-compliance-and-enforcement-%E2%80%93-nutrition-programs-and-activities)
* USDA style, branding and [SNAP logo usage guidelines](https://www.fns.usda.gov/snap/using-snap-logo)
* DES administrative policy and procedure

Send requests for copies of source documents or clarification on material contained in the PPM to DES/HRP by email at CoordinatedHungerReliefProgram@azdes.gov or by telephone at (602) 771-2788.

## DES Principles

### Mission

The Arizona Department of Economic Security makes Arizona stronger by helping Arizonans reach their potential through temporary assistance for those in need, and care for the vulnerable.

### Vision

All Arizonans who qualify receive timely DES services and achieve their potential.

### Values

DES works continuously to demonstrate its values of:

* Accountability: We commit to excellence, innovation, and transparency.
* Integrity: We are trustworthy, honest, and reliable.
* Respect: We appreciate each other, and value those we serve.
* Teamwork: We collaborate with humility and partner with kindness.
* Diversity: We respect all Arizonans, and honor those in need.

### Goals

DES structures its services according to its four goals:

* Serve Arizonans with integrity, humility, and kindness.
* Support Arizonans to reach their potential through social services that train, rehabilitate, and connect them with job creators.
* Provide temporary assistance to Arizonans in need while they work toward greater self-sufficiency.
* Provide children with food, health care, and parental financial support; provide services to individuals with disabilities; and protect the vulnerable by investigating allegations of abuse, neglect, and exploitation.

### DES Nondiscrimination Policy

DES is an equal opportunity provider and prohibits discrimination in admissions, programs, services, activities, or employments based on:

* Race
* Color
* Religion
* Sex
* National Origin
* Age
* Disability
* Genetics
* Retaliation

For further information about this policy, contact (602) 542-0303. TTY/TDD services are available by calling 7-1-1.

## Confidentiality

All client information in any DES record or known to employees, contractors, vendors, volunteers and community partners is confidential and protected by confidentiality rules, laws, and policies. Such information must not be released or discussed, unless the client authorizes the lease or applicable rules, laws, and policies do not require client authorization.

### Types of Confidential Information

Confidential information includes, but is not limited to:

* Any applicant or participant information including:
	+ Name
	+ Date of birth
	+ Social Security number
	+ Address
	+ Telephone number
	+ Benefit amount and participation
	+ Child support information
* Employer and employment information to include:
	+ Employer name and address
	+ Client salary amount
	+ Leave accrual
* Any information obtained from a secure DES system
* Medical or health information
* Any information not generally available to the public

### Information and Physical Security

Partners maintaining an electronic or physical means to store confidential data must follow generally accepted electronic and physical information security measures.

Contractor must not possess confidential client information. When a communication containing confidential information is received, inform the sender that the information is confidential and should be sent directly to DES by using a secure, encrypted method, then destroy the original message.

Computer system security may be addressed at the local level. Agencies are encouraged to consult with their information systems support providers to determine the most appropriate method for securing electronic information, as applicable to their current information technology environment.

Examples of appropriate physical security include, but are not limited to:

* Locking file cabinets
* Securing file rooms; closing and locking the doors
* Not leaving confidential information in places the public can access it, such as on printers, desks and the tops of file cabinets

### Release of Confidential Information

Agencies must not release confidential information to any unauthorized source, nor release any documents that contain the physical address of an [Address Confidentiality Program](https://www.azsos.gov/services/acp) participant.

## Program Background

SNAP is the cornerstone of the Nation’s nutrition safety net. It provides assistance to those who qualify, helps relieve pressure on emergency food providers, and brings considerable nutrition, health, and economic benefits to both clients and communities. Because of its unmatched ability to increase [food security](https://www.usda.gov/topics/food-and-nutrition/food-security) in vulnerable communities, USDA/FNS and DES/HRP have made increasing the awareness of SNAP, and access to it, a priority. Realizing these objectives requires the combined efforts of federal, state, and local public leaders as well as nonprofit community and faith-based agencies, employers, and anyone else who touches the lives of potentially eligible people.

SNAP helps vulnerable households to:

* Stretch their food dollars; those receiving SNAP benefits spend more money on food than potentially eligible but non-participating households do.
* Fight obesity through education; nutrition educators teach SNAP participants the importance of a quality diet, how to prepare healthy foods and how to make healthy choices.
* Put food on the table for their children; SNAP benefits are an investment in the future—nearly half of participants are children.
* Keep seniors independent; for seniors, participation can help improve nutritional status and well-being and increase independence.
* Transition to self-sufficiency; SNAP helps participants become financially stable and provides needed support as they transition to self-sufficiency.

SNAP helps communities by:

* Supporting local food retailers; nationally, the average SNAP benefit per person is approximately [$125 per month](https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap), which is spent in local grocery stores.
* Generating economic activity; as a fiscal stimulus, [every $5.00 in new SNAP benefits generates up to $9.00](https://www.ers.usda.gov/publications/pub-details/?pubid=44749) in economic activity.
* Supporting farms; heightened food demand leads to an activity increase along all stages of food production—a significant share of increased demand for inputs into food processing is for farm products.

## SNAP Access and Information Plan

The annual SNAP Access and Information Plan focuses and defines Arizona’s SNAP outreach direction. The Plan is a fundamental component of the Partnership and provides the opportunity to:

* Set goals, action steps, and timelines and evaluation measures.
* Structure activities in a logical way.
* Target activities to where they are needed most.
* Review accomplishments and opportunities when adapting outreach strategies in response to changing economic conditions or population needs.
* Leverage Partnership resources fluidly and efficiently by enhancing communication among USDA/FNS, DES, Contractor, and Partners.
* Demonstrate the Partnership’s vision of a healthy, food-secure Arizona to public and private leaders, communities, businesses, and nonprofit agencies.
* Contribute to the collection of promising best practices and lessons learned.
* Receive and pass-through funding to reimburse Partners a percentage of their reasonable, allowable, and necessary SNAP outreach administrative expenditures.

Partners are encouraged to review the Plan at the beginning of the year and reference it as needed. A copy of the USDA/FNS-approved Plan is available as an attachment to the PPM.

# Program Administration and Responsibilities

## State Level Administration

DES is the state agency responsible for administering SNAP throughout Arizona. In addition to SNAP, DES administers [several other federal and state programs](https://des.az.gov/services). Many thousands of individuals receive essential services in DES offices each year.

## State Agency Responsibilities

DES is responsible for the following Partnership functions:

* Drafting and submitting the SNAP Access and Information Plan to USDA each year.
* Drawing down program reimbursement funds from USDA/FNS.
* Contracting with, funding, and monitoring a community-based agency for program coordination, facilitating reimbursement pass-through and on-site or remote Partner support through T&TA.
* Supporting Contractor during outreach, Partner recruitment and training events.
* Final approval of Partnership member applications.
* Developing and delivering program-specific civil rights training and material.
* Developing program forms, templates and other material not assigned to Contractor.
* Supporting Contractor’s development of accurate training, outreach and other assigned material, to include the PPM and application assistance training.
* Supporting the development and maintenance of the PPM.
* Approval of Contractor and Partner promotional and informational material.
* Approval of Partner monthly invoices and activity reports.
* Disbursing reimbursement and administrative funding to Contractor
* Final approval of Contractor and Partner budget and scope-of-work amendments.

To fulfill its program administration responsibility, DES may request for review, at any time, program or fiscal records of any agency supported by this partnership. Contractor and Partners are responsible for providing any requested records.

## Local Level Administration

DES contracts with a community-based, nonprofit agency, the [Arizona Community Action Association](https://azcaa.org/), to administer the program at the local level.

## Local Level Responsibilities

Contractor is responsible for the following partnership functions.

* Outreach and education delivery to community and faith-based organizations statewide about the Partnership model.
* Creating and distributing application documents.
* Assisting community and faith-based organizations with the application process, providing guidance and support, and ensuring completeness of Partnership applications for submission to DES
* Conducting initial review of Partnership applications and requesting corrections or clarifications from applicants.
* Notifying community and faith-based organization applicants when SNAP Partnership applications are approved, denied, or amended.
* Notifying Partners when budget amendments, changes in scopes of work, materials, or other changes requested by Partners are approved, denied, or amended.
* Creating accurate training materials tailored when possible to the specific needs of Partners and the communities they serve.
* Conducting or coordinating training and support of Partners, including but not limited to, the following topics:
	+ SNAP application assistance
	+ [Arizona Self Help (ASH) prescreening](http://arizonaselfhelp.org/)
	+ Outreach methods
* Providing ongoing monthly support through Partner Webinars.
* Providing direct support and oversight during site visits with Partners.
* Providing regional networking opportunities to gather and share best practices and discuss barriers.
* Providing Partners with reporting documents.
* Helping to ensure timely submission of Partner monthly invoice and activity reports.
* Providing ongoing oversight and initial review of Partner monthly invoice and activity reports.
* Submitting reimbursement requests to DES.
* Providing Partners with pass-through reimbursement.
* Monitoring expenditures by Partners and notifying Partners of any concerns from Contractor or DES related to expenditure patterns.
* Providing oversight of budget amendment requests and submitting to DES for approval.

To fulfill its program administration responsibility, Contractor may request for review, at any time, program or fiscal records of any Partner supported by this partnership. Partners are responsible for providing any requested records.

## Partner Administration

Each Partner is a unique organization with its own structure, challenges, workflows, and policies. While compliance with program policy and procedure is mandatory, Partners are free to make and implement their own business decisions, insofar as the decision or its implementation do not conflict with program rules or requirements.

## Partner Responsibilities

Partners are responsible for the following Partnership functions:

* Attending trainings provided by DES or Contractor.
* Responding timely to requests from DES or Contractor for document corrections, additions, clarifications or other program requests.
* Providing accurate information to DES, Contractor and clients.
* Attending mandatory trainings. Partners who are unable to attend mandatory trainings must notify Contractor to schedule alternative trainings.
* Participating in mandatory monthly Partner Webinars.
* Participating in site visits conducted by DES or Contractor.
* Notifying DES or Contractor, as appropriate, of program-related concerns and requesting assistance, as needed.
* Submitting monthly Invoice and Activity Reports no later than the 10th of each month to ensure timely processing and reimbursement.
* Submitting an invoice for $0 when there is no activity during the service month
* Monitoring agency expenditures and ensuring that agency expenses do not exceed allocations authorized on Partner’s approved itemized service budget.
* Submitting budget amendments or other amendments as related to the program and providing documentation supporting the amendment.
* Providing fiscal and program records to DES or Contractor, as requested.
* Participating and supporting customer satisfaction by:
	+ Completing Partner Surveys at the completion of trainings and calls.
	+ Distributing and collecting SNAP customer surveys.

Surveys are one of the means by which DES and Contractor measure Partnership effectiveness as compared to Plan goals and evaluation, identify training needs, and detect opportunities for improved policies or program implementation.

Partners must comply with periodic satisfaction survey completion and submission to Contractor as directed by DES or Contractor.

## Community Partners

USDA/FNS and DES recognize the need for trusted community and faith-based organizations to reach individuals and families in need within the community. Partnership allows community and faith-based organizations to draw down Federal funds to help support their anti-hunger work and provides an avenue for members of the community to seek information and assistance at trusted community sites.

### Agency

The Partnership is open to government and tax-exempt, nonprofit community and faith‑based organizations throughout the State of Arizona. In general, for-profit organizations and the for-profit face of a hybridized (e.g., a for-profit medical insurance company may open a subsidiary nonprofit agency to participate in the Partnership or other programs that for-profit agencies are generally not authorized to join or operate) are prohibited from becoming members of the Partnership.

### Partner Outreach Activities

Partners are required to participate in the Information Distribution activity but are free to choose their level of application assistance or forego application assistance altogether, dependent upon Partner resources. Application assistance service levels are defined as:

* Full-Service: Partner staff and volunteers engage with the client and complete the physical actions required for tasks such as prescreening, submitting applications and verification documents and other related actions needed to support client benefit certification.
* Self-Service: Partners provide access to agency-owned electronic equipment, such as computers, scanners, printers and fax machines, to allow clients who do not have said resources to apply and become enrolled in the program though online and other electronic means.

The Information Distribution activity consists of Partners providing clients with information about the benefits of participating in SNAP and the steps needed to become enrolled in the program. Information is distributed in Partner offices, during outreach events or meetings in the community and at Partner remote locations.

In addition to providing the services listed here, some Partners choose to engage in additional activities related to SNAP Outreach. USDA provides guidance on which activities are considered allowable through this funding in the USDA SNAP State Outreach Plan Guidance document. DES and Contractor, to ensure the Partnership is in compliance with USDA guidance, will review all proposed activities not detailed in Partner application documents. Final approval of all activities is at the discretion of USDA.

# Partnership Funding and Applications

## Funding

The Partnership is funded through cost reimbursement via funds drawn down by DES from USDA/FNS. Funding is based on expenditures related to allowable, reasonable, and necessary activities. Partners must be able to support 100% of their program costs up front. Each month, Partners must submit to Contractor an Activity Report and Invoice in order to request reimbursement for activities completed in the prior month. Once approved by Contractor and DES, a reimbursement check will be issued from Contractor directly to the Partner. Contractor and DES make every effort to process reports and reimbursements in a timely manner and are generally able to provide reimbursement to Partners within 8-10 weeks of the invoice submission.

Utilizing cost reimbursement is not a requirement for participation in the Partnership. Organizations not requesting reimbursement are only required to submit an activity report each month; the invoice is not required.

For every $1 a Partner spends on allowable activities:

* The Partner receives 40 cents (40% of the expenditure).
* Contractor receives a percentage in accordance with the DES contract.
* 50 cents is not reimbursed (50% of the expenditure).

Partners must be able to support 100% of their program costs up front. Reimbursement funding availability is determined at the Federal level and subject to change at the discretion of cognizant Federal administrative, oversight, or legislative authorities.

## Applications

When completing the Partnership application, Partners must provide a budget projection covering full program costs (100%) and a detailed staffing chart with all positions funded, at any activity percentage, by the Partnership. Reimbursement will be 40% of total allowable expenditures. Volunteer time is not a reimbursable cost, but all the expenses associated with volunteers are (e.g. space, equipment, etc.) Federal funds awarded for a different program may NOT be used to draw down a reimbursement for this Partnership
(i.e. “double‑dipping”).

Volunteer time is not a reimbursable cost, but the expenses associated with supporting volunteer activities are potentially eligible for reimbursement.

# Activities and Reporting

## Allowable Activities

Allowable activities are those activities permitted by the USDA under SNAP Outreach. Contractor and Partners are responsible for abiding by the guidelines for allowable activities provided by the USDA. Partner applications should include only allowable activities, and each month’s Activity Report and Invoice should reflect these same activities. If there are questions about whether or not an activity is allowable, refer to the USDA guidelines or contact DES/HRP.

For examples of allowable activities, see the USDA SNAP State Outreach Plan Guidance document.

### Allowable Activities Not Eligible for Reimbursement

While an agency may elect to complete one or both of the following activities under a different program, the activity cannot be supported by Federal funds under the Partnership (i.e., the activity is not prohibited, but it is not eligible for reimbursement):

* Recruitment activities designed to persuade an individual to apply for SNAP benefits through the use of persuasive practices. Persuasive practices constitute coercing or pressuring an individual to apply, or providing incentives to fill out an application. For the purpose of this paragraph, reinforcement items purchased and used according to Partnership policy are NOT considered “incentives”.
* The placement of radio, television, and billboard advertisements that promote SNAP benefits and enrollment. This does not apply to social media, so long as the message is not a recruitment activity designed to persuade people to apply for SNAP benefits. For the purpose of this paragraph, “billboard advertisement” is defined as an outdoor, large format advertising display, either permanent or portable, which is used to advertise or inform alongside a roadway. “Billboard advertisement” does NOT include large signs or banners intended for viewing predominantly by individuals not travelling along a roadway. (81 FR 92553)

### Unallowable Activities

The following activities are unallowable and may not be performed by Contractor or Partners under the Partnership:

* Compensating staff for outreach activities based on the number of people who apply for SNAP as a result of that worker’s efforts. For example, paying a staff person $10 for each application they help a client complete is unallowable.
* Interfering during the certification interview or at other times to campaign on behalf of specific applicants or recipients. Note that Partners may be present at the interview to provide support or help explain complicated terms.

## Reasonable and Necessary Activities

All costs must be reasonable and necessary. All costs reimbursed by USDA must be valid obligations for the organization’s SNAP Outreach activities. Reasonable costs are those that provide a program benefit generally commensurate with the amount incurred. Necessary costs are those that are needed to carry out essential functions of SNAP outreach and/or application assistance. See the USDA SNAP State Outreach Plan Guidance document for additional information on reasonable and necessary activities.

## Monthly Reports

Monthly reports and invoices should reflect activity and expenditures related to allowable SNAP Outreach activities. All monthly Partner reports and invoices must be approved by Contractor and DES/HRP before the individual Partner may receive a reimbursement for the reporting month. Unallowable activities cannot be reimbursed under this program. Instructions for completing the reports are located on the reporting forms. Partners may contact Contractor for assistance with completing the reports.

### Accurate and Complete Reporting

It is the Partner’s responsibility to ensure accurate and complete monthly Invoice and Activity Reports are submitted and received by Contractor each month. In months when a Partner does not complete any activity under this Partnership or does not incur any expenses related to the Partnership, the partner must still submit an Invoice showing no expenses ($0) were incurred for the month. An Activity Report is not required in this situation.

All reports must be submitted in their original format. PDF copies of the report may be maintained for your records; however, PDF copies are not acceptable formats for submitting reports to Contractor.

### Partner Reporting Time Frames

Partner monthly invoices and activity reports are due to contractor no later than the 10th day of the month following the service month. When the 10th day of the month falls on a weekend or holiday, reports are due the next business day. Partners must contact Contractor to inform when monthly reports are anticipated to be submitted after the due date.

Invoices and amendments received more than 90 days after the end of the month of activity will impact the opportunity to receive reimbursement.

### Contractor Reporting Time Frames

Contractor’s monthly invoice and activity reports are due to DES/HRP no later than the 20th day of the month following the service month. When the 20th day of the month falls on a weekend or holiday, reports are due the next business day.

## Quarterly Reports

Contractor must submit a quarterly report detailing Contractor’s program activity and financial status during the quarter no later than 45 calendar days after the close of the reporting quarter.

Partners are not required to submit a quarterly report.

## Annual Report

Contractor must submit an annual report detailing Contractor’s program activity and financial status as of the end of the year no later than 45 calendar days after the close of the fiscal year.

Partners are not required to submit an annual report.

# Financial Considerations

## Financial Solvency

Partners must ensure that the organization can cover the full costs of personnel and activities related to this project. The Partnership is based on reimbursement after activities are completed. Partner organizations must be able to cover 100% of the costs of completing the work while awaiting the 40% reimbursement, which takes approximately 8-10 weeks to receive. Partners must also agree to accept sole responsibility for any costs incurred that are not in the Partner’s approved program Itemized Service Budget, or are disallowed by DES or the USDA.

Partner organizations must be able to cover 100% of program expenditures up front. It may take up to 10 weeks for Partners to receive reimbursement funds.

## Budget Tracking

Contractor will provide each Partner with an individual budget tracking worksheet. Partners may use the Contractor-provided worksheet or their own ledgers but must, regardless of tracking method, keep an accurate account of their available funds. Each month after a Partner enters their expenses, the tracking worksheet will inform the Partner what percentage of their allotted budget is remaining. This worksheet is simply a tool for Partners to keep track of their budgets and does not need to be turned in to Contractor or DES.

## Time Tracking

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

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

Partners may create their own form or process, but it must record, at a minimum, staff names, the amount of time spent on outreach activity, a short description of the type of activity being performed, and a summary of any Partnership-funded materials used to complete the activity.

The time tracker does not need to be submitted to Contractor or DES with monthly reports but must be maintained and readily available upon request of Contractor or DES.

# Consumer Surveys

The Partnership has two, two-week consumer survey periods each year. These surveys are designed to help Partners, Contractor, and DES determine additional successes or barriers indicated by the consumer. Surveys should be confidential. Partners should offer surveys to consumers after service is provided and allowing the consumer privacy to complete the survey and to return it to the Partner confidentially.

Consumer survey periods are the last two weeks of January and last two weeks of June. Survey questions are developed by DES and Contractor.

Contractor must make surveys available in paper and electronic formats in English and Spanish languages.

# Amendments

## Changes in Scope of Work

Organizations are required to submit a Scope of Work with their Partnership application, which includes a plan of allowable activities in which the Partner will participate during the year. Changes made to this Scope of Work must be submitted to Contractor in writing for approval no later than 30 business days prior to the anticipated implementation of the change. Contractor and DES/HRP review the proposed change during the 30-day period and respond to the Partner with the change either being approved or pending approval with suggestions or a request for additional information. When additional funding is needed to support changes, the Partner must also send an amended Itemized Service Budget, budget narrative and staffing chart, as relevant to the change.

## Budget Amendments

Partners may request an amendment to the budget as a whole or to specific line items within the budget during the. Budget amendments are necessary when Partners need to change the amount available in a specific line item, shift money from one line item to another, or modify the overall budget by changing multiple line items.

Amendment requests must be made in advance of the expenditures in question. It is recommended that Partners request all budget amendments greater than 5% of the total program budget no later than early April to increase the likelihood of funding availability.

To request a budget amendment, Partners must submit a revised Itemized Service Budget and budget narrative with all proposed changes indicated clearly. The Partner should use the budget narrative to explain the need for the amendment. Once Contractor has reviewed and approved the request, the amendment request will be reviewed by DES/HRP for final approval. A notice of decision will be sent via email after the review process is completed by Contractor and DES.

If the amendment request is approved, Contractor notifies the Partner of the approval via an email with the new Itemized Service Budget and budget narrative attached.

Contractor is authorized to process and approve Partner budget amendments, provided that:

* The amendment would not result in an overall increase to the SCPs total program budget.
* The amendment does not request funding for unreasonable, unallowable, or unnecessary outreach activities.
* The amendment does not result in a Partner staff member being approved for greater than 50% SNAP FTE if the staff member is not already approved for greater than 50% FTE in the current, approved budget.
* The amendment does not conflict with any Federal, State or program rules, requirements or laws.

Contractor makes DES/HRP made aware of the new Partner budget as soon as possible but no later than 10 workdays after the new budget is approved. Contractor notifies DES/HRP by sending updated budget documents and brief summary of the changes made.

Partners must provide documentation supporting the amendment request, before the amendment can be approved. For example, a shift of $2,500 from the Supplies line to the Long Distance Travel line would require the same supporting documentation as if the Long Distance Travel funding had been requested in the original Partnership application.

Amendment requests may take several weeks to process and approve. Partners must continue to work from the original budget. Expenses outside the scope of the original budget are not eligible for reimbursement prior to approval.

For example, Partner XYZ’s telephone company notifies Partner XYZ in March that their rates will increase in June. If Partner XYZ waits to submit an amendment in June and is not approved until August, Partner XYZ must continue to invoice on their original budget until August. In August, Partner XYZ will be able to invoice on their new approved budget.

Budget amendments cannot be applied retroactively. Submit an amendment request as soon as possible after an amendment is determined to be required.

# Training and Technical Assistance

Training and Technical Assistance will be provided to Partners by Contractor, DES and any other qualified parties throughout the year. At the start of the year, Contractor and DES conduct Partner Orientation training to cover the basics of the Partnership as provided in the PPM and Plan. Additional training and technical assistance will be made available throughout the year and can be requested by the Partner at any time.

Contractor recommends that all Partner staff and volunteers completing work under this Partnership utilize trainings available early in the contract year and on an ongoing basis as needed in order to provide high quality, knowledgeable services within communities.

## Required Trainings

### Partnership Orientation

It is the responsibility of the Partner to attend the mandatory Partnership Orientation and to train newly appointed/hired staff or request additional support from Contractor.

### Civil Rights Training

DES will conduct a Civil Rights training at a minimum of twice a year. Annual Civil Rights training is mandatory for Contractor, Partner front-line staff and volunteers who interact with clients, and supervisors of Partner front-line staff and volunteers. At least one staff member from Contractor and one member from each Partner must attend a Civil Rights training presented by DES/HRP. The Contractor or Partner staff member may then train all other required staff and volunteers by using the provided presentation material.

### Monthly Partner Webinars

Contractor and DES co-host mandatory Monthly Partner Webinars. The schedule for these calls will be made available in advance. Calls generally last for 60 minutes. An agenda is provided in advance of each call, and requests to cover specific topics are always welcome from Partners; direct topic requests to Contractor. Partner Calls provide an opportunity for networking, education, policy updates, and discussion of related issues.

Partners are required to have at least one staff member or volunteer attend each monthly call. However, there is no limit to the number of individuals from any given agency who may attend.

### Application Assistance Modules

Contractor offers online SNAP application assistance training modules. All front-line staff who are application assistors must participate in this training, and it is optional, but recommended, that those who have face-to-face contact with clients participate in trainings. Additionally, many Partners have extensive experience with providing training and technical assistance related to outreach and application assistance within communities. Therefore, Contractor or DES/HRP may request the expertise of seasoned Partners to provide support and education to other Partners wishing to enhance or expand their outreach efforts.

Agencies interested in providing support, training, or mentoring to Partners are invited to notify Contractor of their interest. Contractor will then work to make connections between Partners for this type of support.

# Informational Materials

Partners may order materials provided free of charge from the USDA, DES and Contractor. Materials from the USDA can be ordered here: <https://pueblo.gpo.gov/SNAP/SNAPPubs.php>.

Partners may also opt to create original materials. Documents prepared by Partner using program funding and intended for external release, in print, other media or via the internet, must undergo appropriate review and approval prior to release. Submit program informational material to Contractor for review, allowing up to ten (10) business days for the review to be completed.

##  Types of Materials

Program informational material is defined as one-time, periodic, or occasional information distribution that provides factual information to the public or target audience to inform on the benefits of SNAP participation and steps needed to enroll in the program among potentially eligible populations. These materials convey a specific message to a select target audience about SNAP and can be in the form of:

* Brochures
* Fact sheets
* Newsletters
* Press release or other press materials

## Press Releases

Press releases announcing events sponsored by Partners shall not require prior approval unless information is included about the Partnership described herein or SNAP eligibility requirements or rules. Social networking, such as Facebook, Twitter, and blog posts, require prior approval in cases where the Partnership or information regarding SNAP eligibility or programmatic rules is included. Partners must notify Contractor of press releases, kits, or social media publications at the time of or prior to release or publication of the material.

## Required Statements/Disclosures

Materials containing information about SNAP require an appropriate USDA funding credit statement and USDA nondiscrimination statement in accordance with State and Federal agency specifications. See the USDA State Outreach Plan Guidance document and FNS Instruction 113-1 for additional details on the funding credit and nondiscrimination statements.

# Civil Rights Requirements

## Public Notification

The “And Justice for All” Poster (AD-475-B) must be prominently displayed at all sites where outreach is conducted. This poster is the FNS-approved public notification. System. The purpose of this system is to inform applicants, participants, and potentially eligible persons of program availability, program rights, and responsibilities, the USDA policy of nondiscrimination, and the procedure for filing a complaint of program discrimination.

The public notification system must include the following three basic elements:

* Program Availability: Each State agency, local agency, or other sub-recipient that distributes program benefits and services must take specific action to inform applicants, participants, and potentially eligible persons of their program rights and responsibilities and the steps necessary for participation.
* Complaint Information: Applicants and participants must be advised at the service delivery point of their right to file a complaint, how to file a complaint, and the complaint procedures.
* Nondiscrimination Statement: All information materials and sources, including websites, used by FNS, State agencies, local agencies, or other sub-recipients to inform the public about FNS programs must contain a nondiscrimination statement.

It is not required that the nondiscrimination statement be included on every page of a program information website. At a minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information site. If printed material is too small to permit the full statement to be included, the material will, at a minimum, include the short, combined funding and nondiscrimination statement in print size no smaller than the majority of the text in the body of the material. The short, combined statement is: “This project was funded, at least in part, by the USDA. This institution is an equal opportunity provider.”

Posters are available through USDA, Contractor, or DES/HRP. Posters must be displayed in their full native size of 11-inches wide by 17-inches tall and may be displayed either in full-color or gray-scale.

# Site Visits and Monitoring

Contractor must complete a site visit to 20 percent of Partners who are in at least their second consecutive year of Partnership participation and 100 percent of Partners in their first year of participation. Site visits are conducted for the purpose of identifying the work being done by each Partner, helping to problem-solve any issues or concerns, identifying best and promising practices happening at Partner sites, and addressing any ongoing or one-time needs for support or training. Partners should be prepared to review expenditures of Federal pass-through funds and provide the documentation requested when the visit was scheduled. Partners will receive advanced notice of the site visit and of any documents, Contractor would like to review as part of the visit.

Site visits are intended to be an interactive opportunity for Contractor and Partner staff/volunteers to share information and identify ways to strengthen partnerships. Partners will be asked to make 1-2 hours available for a site visit and include activities such as a site tour in the visit. Note that observing Partner staff and volunteers “in action” is preferable when conditions allow, it is not the intent to interfere with or compromise the trust or confidentiality of clients being served on-site.

DES/HRP also conducts site monitoring and desk reviews to ensure Contractor and Partners are utilizing approved materials, providing approved and allowable activities for reimbursement and recording percentage of time spent appropriately. DES/HRP uses a Risk Assessment Indicator Tool to determine which Partners will be reviewed. A minimum of five Partners will be selected for a DES/HRP on-site review each year.

DES/HRP must also complete biannual management evaluation reviews of Contractor performance. As with Partner site visits, Contractor’s visit is scheduled in advance, and documents that will be required for the review will be detailed.

# Record Keeping

It is the responsibility of Contractor and Partners to maintain complete records of work performed as well as time records for staff and volunteers. DES/HRP may request records from Contractor and Partners, and Contractor may request records from Partners at any time. Refer to IRS regulations for detailed guidance on which records must be maintained and the time period each must be kept.

## Record Retention

DES/HRP maintains Partnership records for five years after the close of the relevant fiscal year or date of the most recent activity on the records, whichever is later.

Contractor must retain copies of all financial and other records related to the Partnership for the same five-year period as DES/HRP, and Partners must maintain these documents in their records for the same five-year period used by DES/HRP and Contractor.

## Record Requests and Release

Contractor and Partners must respond to records requests from the USDA or DES. Partners must also provide records to Contractor on request. Note that financial information for Partners will not be shared publicly by Contractor on their website or by other means, unless in aggregate form with all confidential or otherwise protected information removed.

Individual Partner financial information will only be shared among USDA, DES/HRP, and Contractor, or as required by law.

# Continuing Partnership and Partnership Referrals

Partners that wish to continue participating in the Partnership must submit a new application in April prior to the beginning of the new Federal fiscal year. Additionally, if Partners know of other organizations that would benefit from membership, the Partner or other organization is encouraged to contact Contractor or DES/HRP for information and direction regarding the Partnership.

# Conflict Resolution

In the event a conflict arises between any of the parties involved in this Partnership, the foremost goal is to address and resolve the conflict in a professional and courteous manner. The contact steps in this section have been established for conflict resolution.

## Conflict between Partner and Contractor

When conflict occurs between a Partner and Contractor, the Partner notifies Contractor, verbally or in writing, of the concern. When the Partner is not comfortable notifying Contractor directly or is dissatisfied with Contractor’s response, the Partner may notify the DES/HRP Program Manager and Program Specialist of the situation, in writing. Information shared with DES/HRP will be made available to Contractor during the resolution process as is required for resolution of the conflict.

In the event that neither Contractor nor DES can address the concern to the satisfaction of the Partner, a face-to-face meeting among the three parties may be necessary.

In the event that a face-to-face meeting is not able to address concerns, Partners may determine if there is a need to contact USDA/FNS, attempt again to resolve the issue or request a change to the Partnership agreement, if relevant.

## Conflict between Partner and DES/HRP

When a conflict occurs between a Partner and the DES/HRP, the Partner notifies the DES/HRP Program Manager and Program Specialist, verbally or in writing, of the concern. When the Partner is not comfortable notifying DES/HRP directly or is not satisfied with DES’ response to the concern, the Partner should notify Contractor, in writing, about the concern. Information shared with Contractor may be made available to DES/HRP during the resolution process as is required to resolve the conflict.

In the event that neither DES nor Contractor can address the concern to the satisfaction of the Partner, a face-to-face meeting among the three parties may be necessary.

In the event that a face-to-face meeting is still not able to address concerns, Partners may determine if there is a need to contact USDA/FNS, attempt again to resolve the issue or request a change to the Partnership agreement, if relevant.

## Conflict between Partner and DES Local Office

When a conflict occurs between a Partner and DES local office, the Partner notifies Contractor, verbally or in writing, of the issue in question. If the Partner is not comfortable notifying Contractor directly or is not satisfied with the response, the Partner may notify the DES/HRP Program Manager and Program Specialist, in writing, of the situation. Information shared with DES and Contractor may be made available to the local DES office during the resolution process as is necessary to resolve the conflict.

In the event that neither Contractor nor DES are able to address the concern to the satisfaction of the Partner, a face-to-face meeting among the parties may be necessary.

In the event that a face-to-face meeting is not able to address concerns, Partners may determine whether there is a need to contact USDA/FNS, attempt again to resolve the issue, or request a change to the Partnership agreement, if relevant.

## Conflict between Partner and other State Agency

In the event of a SNAP-related conflict between a Partner and a State agency, other than DES, the Partner notifies Contractor, in writing, of the issue in question. Contractor communicates the concern to DES/HRP. DES/HRP then collaborates with the State agency, as requested and is appropriate, on a path to resolution.

# Nondiscrimination

## USDA/FNS Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), 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. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint\_filing\_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

## DES Nondiscrimination Statement

Equal Opportunity Employer/Program. Under Titles VI and VII of the Civil Rights Act of 1964 (Title VI & VII), and the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title II of the Genetic Information Nondiscrimination Act (GINA) of 2008; the Department prohibits discrimination in admissions, programs, services, activities, or employments based on race, color, religion, sex, national origin, age, disability, genetics and retaliation. The Department must make a reasonable accommodation to allow a person with a disability to take part in a program, service, or activity. For example, this means if necessary, the Department must provide sign language interpreters for people who are deaf, a wheelchair accessible location or enlarged print materials. It also means that the Department will take any other reasonable action that allows you to take part in and understand a program or activity, including making reasonable changes to an activity. If you believe that, you will not be able to understand or take part in a program or activity because of your disability, please let us know of your disability needs in advance if at all possible. For further information about this policy, contact 602-542-0303; TTY/TDD Services: 7-1-1. Free language assistance for DES services is available upon request.

# Attachments

## Attachment 1 – Partner Guide Q&A Document

The PPM Partner Guide Q&A (question and answer) Document lists answers to questions commonly asked by Partners and other interested entities.



Double-click the image to open the document in PDF format. Compatible PDF reader software is required. Consult with agency information technology specialists for an appropriate software solution, as needed.