

Cecile Young, Executive Commissioner

Request for Application (RFA) Grant for Supplemental Nutrition Assistance Program (SNAP) Education RFA No. HHS0015831

Attachment 1 to Addendum 5 - Revised Exhibit B, Grant Requirements

I. OVERVIEW

The Texas Health and Human Services Commission (HHSC) seeks to provide behaviorally focused, evidence-based nutrition education, and obesity prevention interventions to the eligible population. Intervention strategies must align with current Supplemental Nutrition Assistance Program Education (SNAP-Ed) Plan Guidance. The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) SNAP-Ed goal is: "To improve the likelihood that persons eligible for Supplemental Nutrition Assistance Program (SNAP) [or other people with low income] will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current Dietary Guidelines for Americans (DGA) and the USDA food guidance."

These standards that are set forth in the Grant Requirements include, but are not limited to, the following:

- A. Applicable federal, state, and HHSC requirements with which Grantees must comply;
- B. Standards of conduct applicable to the Grantees;
- C. HHSC performance measures and expectations for Grantees;
- D. The limitations on grant fund expenditures to authorized activities and services; and;
- E. Financial and programmatic monitoring requirements to ensure that Grantee expenditures do not exceed the grant amount awarded and are in compliance with State and Federal regulations and guidelines.

Grant Requirements for grants awarded to provide SNAP-Ed interventions are intended to provide evidence-based SNAP Nutrition Education and Obesity Prevention Services as authorized by Human Resources Code, Title 2, Subtitle C, Chapter 33, Nutritional Assistance Program.

II. ELIGIBLE POPULATION

The eligible population for SNAP-Ed includes individuals and families who are eligible for SNAP benefits, as well as other low-income individuals who reside in communities with significant rates of poverty.

The Grantee must serve the following Texas SNAP-Ed Target Audiences by providing evidence-based services:

- A. Individuals participating in SNAP;
- B. Individuals who qualify to receive SNAP benefits or other means-tested Federal assistance programs, such as Medicaid or Temporary Assistance for Needy Families (TANF); and

C. Individuals residing in communities meeting the general low-income standard. The general low-income standard is defined as fifty percent (50%) or more of persons have household incomes of less than or equal to one-hundred and eighty-five percent of the Federal Poverty Level (FPL).

All programs and services must be at no cost to the participant. Services must be provided in accordance with the specifications contained and in compliance with the SNAP-Ed Grant Requirements.

III. INFRASTRUCTURE

A. Physical Location and Hours of Operation

Grantee must maintain a physical location accessible to the public Monday through Friday during the hours of 8:00 a.m. to 5:00 p.m. in the local time zone, except on national and State holidays, as established in Section 662.003 of the Texas Government Code. Grantee **may** provide SNAP-Ed services at the established physical location.

B. Holidays

Grantee may observe other holidays in addition to the standard state and national holidays if advance written notice is provided to HHSC. Grantee must submit the written notice at least thirty (30) calendar days prior to the holiday and office closure to the SNAP Education SAR/VAR mailbox (snap_ed_sar_var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov).

C. Fiscal Management

Grantee must have accounting and internal controls to ensure proper management of federal and state funds, maximize non-federal resources, and maintain solvency. The Grantee's accounting and internal control systems must meet the following requirements:

- 1. The systems must be appropriate to the size of the organization.
- 2. The accounting system must consist of source documents, a chart of accounts, journals, ledgers, and routine financial reports.
- 3. The accounting system must be capable of producing expenditure reports, cost center analyses, budget formats, and automated reports as required by, and without additional support from HHSC.
- 4. The accounting and internal control system must safeguard Grantee's assets, produce accurate accounting data, promote efficient operations, and encourage adherence to prescribed accounting policies and procedures.
- 5. The accounting and internal control systems must involve a division of responsibility among different employees for a sequence of related functions, clear establishment of each employee's responsibilities and duties, and use of standards such as procurement policies, proofs, checks, and other security measures.

D. Data Management Systems

Grantee must use the following to maintain, track, and report SNAP-Ed Data, Annual Plan, and Annual Report submissions:

1. PEARS (Program Evaluation and Reporting System)

Purpose: A web-based tool for tracking, managing, and reporting SNAP-Ed program activities, interventions, and outcomes. Key Features:

- a. Tracks interventions, educational activities, and direct interactions with participants.
- b. Supports outreach reporting and demographic data collection.
- c. Helps set and monitor SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) Objectives.
- d. Ensures compliance with federal guidelines.
- N-PEARS (National Program Evaluation and Reporting System) Purpose: A national platform for collecting and reporting standardized data across all SNAP-Ed Programs nationwide. Key Features: a. Aggregates data from all statelevel programs
 - b. Facilitates national performance reporting to the USDA.
 - c. Provides tools for consistent evaluation of program effectiveness.
- E. Formal Communication

The Grantee must use the formal communication process established by HHSC for receipt and response to requests for information, work products, required reports, updates, and correspondence related to the grant requirements. HHSC will issue a State Action Requests (SAR) to the Grantee following established procedures and timelines. The Grantee must submit a Vendor Action Request (VAR) to HHSC following established procedures and timelines, inclusive of the submission of the Contract Required Reports, Key Performance Requirements (KPRs), and other required submissions, requests, or inquiries. In addition to the requirements stated above, the Grantee must:

- 1. Submit complete and accurate responses to any SAR request received from HHSC no later than ten (10) Calendar Days after receipt of the request unless a response due date is specified in the request.
- 2. Submit a written request for an extension of the SAR request deadline that specifies the estimated date of completion and reason for the request for an extension no later than three (3) Calendar Days after receipt of the SAR request (this excludes extensions for established due dates for Required Reports).
- 3. Provide ad hoc reports and respond to legislative inquiries and other high priority requests within thirty-six (36) hours from the time of the request or by the due date and time specified by HHSC.

4. Submit all communications related to the contract to the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>), unless otherwise stated in the contract.

F. Contract Monitoring Questionnaire

The Grantee must comply with all applicable cost principles, audit and contract monitoring, and administrative requirements in accordance with Contract, contract management guidelines, and state and federal rules and regulations. To ensure compliance with these requirements, HHSC utilizes a risk-based contract monitoring process. The Contract Monitoring Questionnaire (CMQ) is part of the risk-based contract monitoring process and provides HHSC with detailed and ongoing information regarding the Grantee's internal and financial controls and other general contracting processes. The Grantee must submit the initial CMQ within ten (10) Calendar Days from the Contract Effective Date, and annually thereafter, sixty (60) Calendar Days prior to the end of each Federal Fiscal Year as required in Exhibit C. Required Reports ID, SNAP Ed R-01.

The Grantee must submit the Contract Monitoring Questionnaire to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u> and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

IV. PROGRAM REQUIREMENTS

The Grantee is responsible for providing SNAP-Ed services that improve targeted state or community-level factors and contribute to state and local outcomes. All services provided must be in accordance with the grant requirements. Projects must aim to enhance nutrition and physical activity education, improve access to healthy foods, and promote active lifestyles within these communities, ensuring that all proposed activities and outcomes effectively address the needs of the target population.

A. State Priority Goals and (SMART) Objectives

The Grantee must demonstrate how they will achieve at least two (2) of the five (5) Texas SNAP-Ed State Priority Goals and corresponding SMART Objectives for each Project. These SMART objectives must be completed within the fiscal year of the contract, as outlined in the Grant Requirements Exhibit(s).

1. State Priority Goal 1: Support Policy System and Environment (PSE) strategies to build healthier communities by increasing access to nutritious foods and removing barriers to their consumption.

Goal: Create opportunities and remove barriers to accessing and consuming nutritious foods.

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SMART Objectives:

- a. Plan, develop and initiate implementation within the first fiscal year.
- b. Conduct baseline evaluations and consultations.
- c. Complete implementation and evaluation by the end of the second fiscal year.
- d. Maintain ninety percent (90%) of PSE changes from prior fiscal year while adopting new PSE Changes each fiscal year.

Example: Develop and cultivate community and/or school gardens that provide education, training, and ongoing support. This initiative may involve collaborating with schools to transform unused spaces into productive gardens that not only yield fresh vegetables but also offer educational opportunities for students and families about the benefits of consuming fresh produce. Additionally, partnering with workplaces or churches to establish SNAP-Ed programs can incorporate nutrition education and physical activity challenges for employees or congregants.

2. State Priority Goal 2: Increase consumption of fruits, vegetables, and other components of a healthy diet among eligible populations.

Goal: Encourage the eligible population to increase their consumption of fruits, vegetables, and other foods that constitute a healthy diet.

SMART Objectives:

- a. Evaluate voluntary behavior changes related to the increased consumption of healthy foods among the eligible population.
- b. Demonstrate progress is self-reported positive behavior change among twenty-five percent (25%) of SNAP-Ed participants each fiscal year.

Example: Organize cooking demonstrations and nutrition workshops in partnership with local schools, community centers, or Farmers Markets. Participants will learn how to prepare simple, healthy meals using fresh ingredients. The program will assess changes in participants' food choices and self-reported increases in fruit and vegetable consumption following the demonstrations.

3. State Priority Goal 3: Increase knowledge of food resource management and food preservation among eligible populations to save money and improve nutrition security.

Goal: Assist eligible populations in saving money and enhancing their food security by teaching food resource management and preservation skills.

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SMART Objectives:

- a. Evaluate voluntary behavior change regarding food resource management and food preservation.
- b. Demonstrate progress in self-reported behavior changes among 10% of participants each fiscal year.

Example: Changes in individual and family behaviors that reflect smarter shopping and food resource management strategies, enabling participants to stretch their food resource dollars to support a healthier diet. Strategies include direct education, improvements in food layout or display, signage, procuring local food, and food safety and nutrition policies.

4. State Priority Goal 4: Increase ongoing physical activity among the eligible population per the recommended physical activity guidelines in conjunction with nutrition education.

Goal: Increase ongoing physical activity among the eligible population per the recommended physical activity guidelines in conjunction with nutrition education. SMART Objectives:

- a. Evaluate voluntary behavior changes in physical activity levels among participants.
- b. Demonstrate progress in self-reported behavior changes among twenty percent (20%) of participants each fiscal year.

Example: Organize community walking groups or fitness challenges. Participants will be encouraged to engage in daily physical activities such as walking, jogging, or biking. Over time, progress will be tracked through self-reported physical activity logs or participation in organized events like 5K races or community fitness days, demonstrating an increase in regular physical activity.

5. State Priority Goal 5: Increased Grantee participation in Texas SNAP-Ed community engagement and special projects led by the State agency, while incorporating lessons learned into program improvements.

Goal: Increase Grantee participation in Texas SNAP-Ed community engagement and special project efforts led by the State agency while incorporating lessons learned into program improvements. Examples of State Priority Goal 5 include: Collaborating with multiple sectors to increase awareness of SNAP-Ed Programming and building relationships with both federally and non-federally recognized tribal communities. The Grantee must document participation and

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engagement strategies for each event, media including photos, lessons learned, and outcomes that can be applied to future program improvement efforts.

SMART Objectives:

- a. Host a minimum of one event for the annual Healthy Texan Week to promote healthy nutrition and physical activity.
- b. Collaborate with a minimum of two new partners (e.g., community organizations, tribal entities) each fiscal year to expand program reach.

Example: Organize an event as part of the annual statewide Healthy Texan Week, where SNAP-Ed contractors and community leaders can share successful strategies and engage in best practices. Workshops and sessions may include tribal community representatives and showcase lessons learned from SNAP-Ed programs across the state. These events will focus on promoting physical activity and healthy eating, with measurable outcomes in the form of increased contractor participation and multisector engagement.

B. Approaches

The Grantee must select and implement two (2) or more of the required Intervention Approaches below. Each approach includes examples of allowable activities and efforts allowable under SNAP-Ed guidelines to meet the intervention goals:

- 1. Approach One: Individual or group-based direct nutrition education, health promotion, and intervention approaches consistent with <u>Exhibit P, FY2025 SNAP-Ed Plan Guidance</u> and <u>Exhibit B, Grant Requirements</u>. This approach involves direct nutrition education and physical activity interventions that incorporate effective best practices. Allowable activities may include:
 - a. Behaviorally focused strategies: Conducting direct education sessions on healthy eating and physical activity habits.
 - b. Targeted Messaging: Developing targeted messages and interventions tailored to different populations' unique needs and preferences, to encourage behavior change and promote healthy habits.
 - c. Multiple channels of communication: Utilizing social media, text messaging, and community newsletters to reach participants.
 - d. Active personal engagement: Facilitating one-on-one sessions or small group discussions to enhance learning.
 - e. Sustained intensity: Implementing a series of classes of activities over a period of time to reinforce behaviors.
- 2. Approach Two: Comprehensive, multi-level interventions at multiple complementary organizational and institutional levels consistent with Exhibit P,

<u>FY2025 SNAP-Ed Plan Guidance</u> and <u>Exhibit B, Grant Requirements.</u> SNAP-Ed Approach Two may address several or all elements of the Social Ecological Model (SEM) and may focus on the individual, interpersonal (family, friends, etc.), organizational (workplace, school, etc.), community (food retailers, food deserts, etc.), and public policy or societal (local laws, social norms, etc.) levels. Everyone has a role in supporting healthy eating patterns in multiple settings nationwide, from home to school to work to communities where people live, learn, work, shop, and play. A key tenet of multilevel interventions is reaching the SNAP-Ed-eligible audience at more than one level of the SEM and ensuring that the interventions mutually reinforce one another. Multilevel interventions are thought to involve three or more levels of influence. Allowable activities may include:

- a. Partnerships with food retailers: Collaborating with distributors, schools, and local stores, to increase the availability of healthy foods in SNAP-Ed communities.
- b. Organizational policy change: Working with city officials, workplaces, and community centers to implement nutrition and physical activity policies.
- c. Community engagement: Hosting community forums to discuss food access, food management, and support local solutions.
- d. Environmental change: Supporting initiatives that increase the availability of spaces for physical activity or promote access to fresh produce involving three or more levels of influence in underserved areas.
- 3. Approach Three: Community and public health approach to improving nutrition and preventing obesity, consistent with <u>Exhibit P, FY2025 SNAP-Ed Plan Guidance</u> and <u>Exhibit B, Grant Requirements</u>. This approach involves collaborating with local governments and organizations to create conditions that encourage healthy food access and physical activity. Allowable activities may include:
 - a. Policy Development: Working with local governments to establish policies that support healthy food environments in eligible areas.
 - b. Collaboration with community groups: Partnering with Food Policy Councils or Nutrition Policy organizations to improve nutrition and physical activity environments.
 - c. Public health initiatives: Facilitating campaigns or events that promote healthier eating habits among the eligible population.

There is an overlap between SNAP-Ed Approaches Two and Three, as Social Marketing and PSE change efforts are included in both approaches. This overlap indicates the integrated nature of reaching the intended audience through multiple levels of influence. This approach is suitable for developing comprehensive SNAP-Ed Plans.

C. Strategies

The Grantee must use specific strategies for the implementation of the Project. Strategy options are below:

1. Direct Education (DE) Strategy (suitable for Approach One and Two): In this strategy, participants are actively engaged in the learning process with an educator and/or interactive media, such as a group nutrition lesson. This strategy emphasizes face-to-face, or media driven educational interventions where participants directly learn about nutrition and healthy behaviors. (Must include at least three (3) sessions spanning three (3) weeks).

Example: Conducting a series or educational sessions where participants learn to prepare healthy meals, with live instruction or interactive online resources.

2. Social Marketing (SM) Strategy (suitable for Approaches Two and Three): Grantees can incorporate Social Marketing as part of the multi-level interventions in SNAP-Ed Approach Two or as part of community and public health efforts of SNAP-Ed Approach Three. According to the Centers for Disease Control and Prevention (CDC, Social Marketing is defined as "the use of marketing theory, skills, and practice to achieve social change." This strategy involves utilizing media campaigns to encourage healthy eating habits and physical activity at a population level.

Example: Implementing a media campaign that promotes SNAP-Ed Services, encouraging low-income families to access healthy food options through public service announcements, social media, and print materials.

- 3. Policy, System, Environment (PSE) Strategy (suitable for Approaches Two and Three): PSE change efforts can be implemented across a continuum and must be integrated as part of the multi-level interventions in SNAP-Ed Approach Two or in a more comprehensive manner through the community and public health approaches in SNAP-Ed Approach Three. PSE strategies aim to modify policies, systems, and environments to create lasting change that enhances the sustainability and effectiveness of SNAP-Ed within communities. The following definitions and examples are intended to assist the Grantee in understanding their role in implementing PSEs for the SNAP-Ed Program.
 - a. Policy is defined as a written statement of an organization's position, decision, or course of action. Ideally, policies outline actions, resources, implementation, evaluation, and enforcement. Policies are developed within public, nonprofit, and business sectors. They can help guide behavioral changes for the audiences served by SNAP-Ed programming.

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- b. Systems changes are unwritten, ongoing, organizational decisions or changes that result in new activities reaching large proportions of the population served by the organization. System changes modify how the organization or network of organizations conducts its business. An organization may adopt new interventions, reallocate resources, or significantly modify its direction to benefit low-income individuals in qualifying sites and communities. System changes may occur before or after a written policy is established.
- c. Environment changes encompass both built and physical environments that are visual/observable but may include economic, social, normative, or message environments. Modifications in settings where food is sold, served, or distributed can promote healthy food choices. Social changes involve shaping attitudes among administrators, teachers, and service providers regarding the time allocated for school meals or physical activity breaks. Economic changes can include financial disincentives or incentives designed to encourage desired behaviors, such as increasing the purchase of fruits and vegetables. SNAP-Ed funds cannot be used to provide the cash value of financial incentives; however, they can be used to engage farmers' markets and retail outlets in collaboration with nutrition education and healthy food access initiatives.

Examples: Collaborating with local governments to develop policies that increase access to healthy foods in low-income areas. This could include zoning changes to facilitate the establishment of new farmers markets or community gardens in underserved neighborhoods.

D. Project Priorities

The Grantee must implement one (1) or more Project Priorities as defined below:

- 1. Schools and/or Communities: SNAP-Ed services may be provided in a school or community-based setting to promote consistent physical activity and nutrition education opportunities, programs, or environments for adults or children in low-income communities, as well as workshops, conferences, and training specifically designed for SNAP-Ed.
- 2. Physical Activity & Nutrition Education: Grantees must implement comprehensive strategies that promote physical activity and nutrition education among SNAP-eligible populations. These efforts should be designed to increase knowledge, encourage behavior change, and create supportive environments for healthier lifestyles. Programs should provide direct education on nutrition and physical activity, ensuring accessibility and cultural relevance for the target audience. Additionally, grantees should incorporate community-based engagement and environmental approaches that address barriers to healthy behaviors. Activities may include structured nutrition and physical activity sessions, integration of health

messaging in community and school settings, and partnerships with local organizations to expand reach and impact. Digital and multimedia outreach should also be utilized to reinforce key messages and provide ongoing support to participants. Grantees must track program effectiveness and demonstrate measurable outcomes that align with SNAP-Ed goals.

- 3. Health Care Organizations: The Grantee must be a Health Care Organization or must be in partnership with a Health Care Organization, including Federally Qualified Health Centers, local health departments, free clinics, and other health care entities that serve low-income or SNAP-eligible populations. Health promotion and primary prevention of disease should be the focus and aim of SNAP-Ed activities proposed under this project such as:
 - a. Soliciting the support of non-profit hospitals to fund community benefits by providing access to summer meals, using dietitians to teach healthy eating in schools, providing healthy messaging through reputable social media, and providing farmers' markets incentives.
 - b. Designing and providing health education and exercise training for after-school programs or senior centers through the hospital fitness and wellness program which targets a decrease in the health risks of obesity.
 - c. Multimedia health promotion resources, such as healthy messaging videos in medical clinics or other tools that support activities and information sharing for the eligible populations.
 - d. Special consideration may be given to multi-level projects that impact veterans, older adults, and individuals with disabilities, focusing on a tiered approach to treating and preventing childhood and adulthood obesity by providing the following:
 - e. Direct intervention to children, individuals, and families; and
 - f. Best practices and tools for primary care and pediatric clinics and clinicians serving the target population to promote healthy eating and physical activity.
- 4. Farmers Markets: Farmers Markets are a priority, including evidence-based projects/programs that promote nutrition education and obesity prevention through partnering with farmers' markets. SNAP-Ed funds may not be used to provide the cash value of financial incentives; however, SNAP-Ed funds can be utilized to engage farmers' markets and retail outlets to collaborate with other groups and partner with them. Examples of Farmers' Market Project Priorities could consist of one (1) or more of the following:
 - a. Working to bring farmers markets to low-income areas;
 - b. Advising an existing market or providing technical assistance on the process for obtaining Electronic Benefits Transfer (EBT) machines to accept SNAP benefits;

- c. Providing obesity prevention interventions at farmers markets serving low-income communities;
- d. Partnering with organizations that offer incentives for the purchase of fresh produce at farmers markets and mobile markets;
- e. Conducting food demonstrations and sharing appropriate recipes with shoppers at farmers' markets;
- f. Training farmers and farmers' market managers on increasing access to and promotion of fruits and vegetables, whole grains, and low-fat dairy.
- 5. Indian Tribal Nations: Projects focusing on this priority population must include evidence-based outcomes promoting nutrition education and obesity prevention through partnerships with Indian Tribal Organizations (ITOs). ITOs can apply directly, or agencies that implement Food Distribution Programs on Indian Reservations (FDPIR), Local Health Departments that have consulted with an ITO, and university extension programs that have consulted with an ITO may provide interventions, healthy messaging, and other health promotion resources.
- 6. Community and School Gardens: This priority requires evidence-based initiatives that promote nutrition education by developing community and/or school gardens. These gardens must provide ongoing education, information, and training to eligible populations and related organizations, businesses, or systems.
- 7. Border Regions including Colonias: Due to the high prevalence of food deserts, poverty-related chronic illnesses, and obesity within this population, these projects must collaborate with community-based organizations or institutions to implement evidence-based programs. The focus should be on promoting nutrition education, creating opportunities, and removing barriers to access and consumption of nutritious food.
- 8. Other: If the Grantee selects "Other," the Grantee must provide a clear explanation of the priority, including relevant data or evidence that supports the need.
- E. Evidence-Based Approach

FNS has identified three categories of evidence interventions along a continuum: research-tested, practice-tested, and emerging. These categories differ based on scientific rigor, evaluation outcomes, research translation, and level of innovation. To maintain Texas SNAP-Ed's rigor, only research-based and practice-tested are permitted.

All SNAP-Ed nutrition education and obesity prevention interventions must be evidence-based, incorporating research-based and practice-based strategies.

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To achieve this, the Grantee should utilize interventions that have been rigorously tested and proven effective in promoting healthy behaviors and environments. These interventions can be categorized into two main approaches:

- 1. Research-tested: This approach is based on relevant rigorous nutrition and public health nutrition research, including systematically reviewed scientific evidence, and other published studies and evaluation reports that demonstrate significant effects on individual behaviors: food/physical activity environments: or policies across multiple populations, settings, or locales.
- 2. Practice-tested: This approach is based upon unpublished evaluation reports and case studies by practitioners working in the field that have shown positive effects on individual behaviors, food/physical activity environments, or policies.

Grantees must ensure the evidence-based interventions accomplish the following:

- 1. Demonstrate the following through research review or sound self-initiated evaluation:
 - a. Testing and Relevance: Interventions must have been tested and proven meaningful for the specific, eligible population(s).
 - b. Implementation and Justification: Interventions must be implemented as intended, or if modified, there must be a clear justification which must be approved by HHSC in the Annual Plan submission.
- 2. Impact: Interventions must demonstrate the intended effects on behavior and on policies, systems, or environments. Provide emerging evidence and results of efforts such as State and community-based programs that show promise for practice-based interventions. Where rigorous reviews and evaluations are not available or feasible, practice-based evidence may be considered. Information from these types of interventions may be used to build the body of evidence for promising SNAP-Ed interventions. The Grantee must provide justification and rationale for implementing projects built on practice-based evidence and describe plans to evaluate them.
- F. HHSC Programmatic Monitoring

SNAP-Ed is monitored at the State and Federal Level, including FNS management evaluation review. Every Federal Fiscal Year, HHSC will monitor each Grantee and may conduct site-visits to conduct programmatic monitoring activities.

The Grantee is required to provide the following documents during programmatic review, including, but not limited to:

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- 1. Copies of intervention materials and describe intervention revisions.
- 2. Written policy or procedures to identify and notify the community to ensure SNAP-Ed eligible individuals are receiving appropriate SNAP-Ed funded services.
- 3. Written policy or procedures to track initial and ongoing staff training, including civil rights training.
- 4. Copies of Memoranda of Agreement or Understanding for all coordination and collaboration activities
- 5. Proof of (And Justice for All Poster)
- 6. Proof of (HHSC Civil Rights Posters)
- 7. Documentation of Time and Effort for staff devoting less than one hundred percent (100%) of their time to SNAP-Ed funded programming.
- G. HHSC Needs Assessment

The Grantee must collaborate and actively participate in any needs assessment and evaluation activities conducted by HHSC. This participation includes, but is not limited to:

- 1. Data sharing: Providing relevant data and information required for the needs assessment in a timely and accurate manner.
- 2. Stakeholder Engagement: Engaging with key stakeholders, including community partners, and program participants to gather comprehensive input and feedback.
- 3. Meetings and Workshops: Attending and contributing to meetings, workshops, and other collaborative activities organized as part of the needs assessment process.
- 4. Implementing support: Assisting in the implementation of strategies and actions derived from the needs assessment findings, as necessary.
- 5. The Grantee must ensure full cooperation and timely responsiveness throughout the needs assessment process.

H. HHSC Evaluation

The Grantee must collaborate with the HHSC-funded Evaluation Contractor (Evaluation Contractor) and HHSC Program Staff throughout each fiscal year to develop and execute evaluation plans targeting SNAP-Ed evaluation framework priority outcomes for both children and adults.

Grantees must participate in data collection calls and coordinate with the HHSC-funded Evaluation Contractor to gather necessary data for accessing the outcomes of SNAP-Ed funded direct education activities.

1. PEARS: The Grantee is responsible for entering all collected data and outcome assessments into PEARS for all SNAP-Ed funded activities. This data must be

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accurate, comprehensive, and submitted in a timely manner as specified by the evaluation team.

- 2. Communication: The Grantee must maintain regular communication with the HHSC data team and the evaluation team by participating in bi-weekly or monthly meetings, as determined by the project requirements, to discuss evaluation progress, data collection updates, and any issues that arise to ensure that the evaluation plans are effectively executed. This includes participating in scheduled meetings, providing updates on the progress of the data collection, and addressing and issues that arise during the evaluation process.
- I. SNAP-Ed Nutrition Education Reinforcement Item (NERI) Submissions and Report Grantees that choose to purchase Nutrition Education Reinforcement Items (NERI) must upload all NERI requests to the designated SharePoint folder for review and approval at least fifteen (15) Calendar Days prior to the intended purchase date and prior to printing or distribution. NERI requests must have a clear, relevant, and useful connection to FNS/SNAP nutrition education or obesity prevention messages. NERI requests must include:
 - 1. Description of items being purchased.
 - 2. Justification and activity or activities items will be used for.
 - 3. Anticipated number participants to be served.
 - 4. Item Quantity
 - 5. Price Per Item
 - 6. Total Cost
 - 7. Imprint Information (mock-up of imprinted information)
 - 8. Three current bids with bid expiration date.

Grantee must submit a monthly NERI Purchase Report that includes a list of the HHSC approved NERI items purchased for the SNAP-Ed program as required in <u>Exhibit C</u>, <u>Required Reports</u> ID, SNAP Ed R-02. The NERI Purchase Report must be submitted monthly, within fifteen (15) Calendar Days following the month being reported. The Grantee must submit the NERI Purchase Report to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u> and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>). If the Grantee does not purchase NERI, the NERI Purchase Report must still be submitted informing HHSC that no NERI items were purchased for the month being reported.

J. SNAP-Ed Intervention Submissions

The Grantee must upload all evidence-based interventions that the Grantee will implement for the SNAP-Ed Program via the designated SharePoint folder, for HHSC review within fifteen (15) Calendar Days from the Contract Effective Date. Along with the submission, the Grantee must follow the formal communication process to submit

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the intervention(s) to HHSC. The email submission must include a notification that the intervention(s) were uploaded to the designated SharePoint folder and include 1.) brief description of the intervention(s), 2.) the intended audience, and 3.) the proposed implementation plan, as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R03. Changes to the interventions must be submitted to HHSC for review at least thirty (30) Calendar Days prior to the implementation change. The Grantee must allow a minimum of fifteen (15) Calendar Days for the review process. The Grantee must submit the Intervention Submissions to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

K. SNAP-Ed Calendar of Events Submissions

The Grantee is required to upload an annual Calendar of Events to the designated SharePoint folder, within fifteen (15) Calendar Days from the Contract Effective Date, and Quarterly by the thirtieth (30th) Calendar Day following the quarter being reported or immediately when a change has been made, as required in <u>Exhibit C,</u> <u>Required Reports</u> ID, SNAP Ed R-04. The Grantee must also submit the SNAP-Ed Calendar of Events via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Calendar of Events submission must include all planned events related to SNAP-Ed grant activities. Along with the SharePoint submission, the Grantee must use the formal communication process to notify HHSC of the submission. The email should include a brief description of any noteworthy events or changes.

The Calendars of Events must include the following details for each event:

- 1. Event Name Title of the Event.
- 2. Date and Time: the scheduled date and time of each event.
- 3. Location: The address and venue where the event will take place.
- 4. Event description: a brief overview of the event's purpose and activities.
- 5. Registration Information: please include any links to the registration page and deadlines to register.
- 6. Point of Contact: Name and contact information of the point of contact or instructor.
- 7. Intervention: Identify evidence-based intervention
- 8. Approach: Indicate whether the event is Direct Education (DE), SM Social Marketing or Policy, System, Environment (PSE) (Reference Form C-1, Section 5).
- 9. Mode of delivery: Indicate if the delivery will be (In-person, virtual, or hybrid) include link for web-based events.
- 10. Eligible Populations: the demographic or group that the event is aimed at.

11. Outcomes/Goals: the anticipated outcomes or goals of the event.

HHSC may, at their discretion, request additional information and details pertaining to any event on the Grantees Calendar of Events submission.

V. OTHER REQUIREMENTS

A. Nondiscrimination Statement

The Grantee must ensure that all materials adhere to the USDA nondiscrimination policy. All communications, including print and nonprint materials, must include the statement: "This institution is an equal opportunity provider." For materials that contain USDA logos or communicate SNAP-Ed programming, the full nondiscrimination statement must be used when SNAP or other FNS program eligibility or application information is provided. Materials must comply with Section 508 (meet accessibility standards) and all applicable civil rights laws and policies. The Grantee must inform participants of the procedure to file a program discrimination complaint. Complaints can be filed using Form AD-3027, available online, at any USDA office, or by contacting the USDA at:

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

Fax: (833) 256-1665 or (202) 690-7442; or Email: <u>FNSCIVILRIGHTSCOMPLAINTS@usda.gov</u>.

B. Funding Credit

The Grantee must credit SNAP as a funding source on all developed or reprinted materials. The following statement must be included: "This material was funded by USDA's Supplemental Nutrition Assistance Program - SNAP." Spanish translation : "Este material se desarrolló con fondos proporcionados por el Supplemental Nutrition Assistance Program (SNAP en inglés) del Departamento de Agricultura de los EE.UU. (USDA siglas en inglés)."

C. USDA and SNAP Logo

The Grantee must not use USDA symbols or logos without permission. If any changes or additions are made to the content, design, or language of USDA or FNS materials, or if an organization's logo is added, the SNAP and USDA logos must be removed. The following statement must be included: "Adapted from U.S. Department of Agriculture, Supplemental Nutrition Assistance Program. USDA does not endorse any products, services, or organizations. Provided by [organization's name]." For SNAP logo usage, the Grantee must comply with the SNAP Logo Guide and must not alter the logo. The following statement must accompany materials with the SNAP logo: "The SNAP logo is a service mark of the U.S. Department of Agriculture. USDA does not endorse any

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goods, services, or enterprises." Questions regarding logo usage should be directed to <u>SNAPLogo@usda.gov</u>.

D. Civil Rights Training Requirement

The Grantee must ensure that staff involved at all levels of SNAP-Ed (i.e., managers, supervisors, frontline staff, volunteers, etc.) complete a State Agency-approved Civil Rights Training within fifteen (15) Calendar days from the date of hire and annually thereafter. The Grantee must upload each individual certificate of completion for Civil Rights Training to the designated SharePoint site maintained for their organization, as established by HHSC. This SharePoint site will serve as the repository for all training records, which must be available for HHSC review upon request. The Grantee must also maintain all training records on file for audit purposes. The Grantee must maintain all training records on file and available to HHSC for review upon request.

E. FNS Civil Rights Training Report

The Grantee must submit the FNS Civil Rights Training Report by the thirtieth (30th) Calendar Day following the end of the quarter being reported, as required in <u>Exhibit C</u>, <u>Required Reports</u> ID, SNAP Ed R-05. The FNS Civil Rights Training Report must include a complete list of Grantee's SNAP-Ed employees and volunteers and indicate whether the required employees and volunteers have completed the required SNAP-Ed approved Civil Rights Training. The Grantee must submit the FNS Civil Rights Training Report to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

F. Data Exchange Guidance

7 CFR §272.11 (1) provides the limited circumstances where State agencies may disclose information obtained from SNAP Grantee or recipient households. These provisions permit the disclosure of this information to those directly connected with the administration of SNAP-Ed, including SNAP-Ed itself. For the purposes of SNAP-Ed, these provisions apply to the sharing of SNAP participant data between States and implementing agencies. All Grantees must adhere to protections for all SNAP Grantee or recipient household data, which may be used to identify individual SNAP Grantees or recipients, also known as personally identifiable information (PII).

Participant data must be stored and exchanged using encrypted servers. All individuals who will be managing PII must be trained on secure access, usage, and must annually sign a document stating they understand their responsibilities. All training records and signed acknowledgements must be maintained in the employee file and available to HHSC for review upon request.

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State and implementing agencies must establish a data exchange agreement before data can be shared. These agreements are not part of the State Agency's Plan of Operation and must specify the following:

- 1. Data that will be exchanged using encrypted servers;
- 2. How data will be stored and who will have access;
- 3. Training procedures for individuals who will be managing PII;
- 4. Procedures used to exchange the data between the two entities;
- 5. Steps to be taken in case of a data breach; and
- 6. Steps to securely destroy data ninety (90) days after data is no longer in use.
- G. Operations Plan

The Grantee must submit a Plan of Operation, meeting all requirements listed below, to HHSC for review and approval within ninety (90) Calendar Days after the Contract Effective Date. The Grantee must submit any changes to the Operations Plan to HHSC for approval at least thirty (30) Calendar Days before a change becomes effective, as required in <u>Exhibit C, Required Reports</u> ID, SNAP-Ed R-06. The Grantee must submit the Operations Plan to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Operations Plan must include but is not limited to the following:

- 1. Hours of operation and the setting in which the services are provided.
- 2. Names, position titles, and contact information for administrative staff and their responsibilities related to fulfilling contractual obligations.
- 3. List of staff and position responsibilities delivering services.
- 4. Comprehensive description and delivery method for services provided to clients and work plan on how SNAP-Ed will maintain availability to the SNAP-Ed eligible populations in the State.
- 5. Comprehensive description of how all geographical areas including high-need hard-to-reach populations will be served, especially if there have been any adjustments in methodology or staffing coverage.
- 6. Comprehensive description of strategies for evaluating the program and managing customer satisfaction.
- 7. Assurances that staff in the SNAP-Ed program meet the required qualifications set forth within <u>Section VI. Required Services</u>, <u>Key Personnel and</u> <u>Organizational Requirements</u>.
- H. Transition Plan

The Grantee must develop and submit a comprehensive Transition Plan at the time of application, and no later than ten (10) Calendar Days after the Contract Effective Date, as required in <u>Exhibit C, Required Reports</u> ID, SNAP-Ed R-07. The Grantee must submit updates and changes to the Transition Plan to HHSC for approval at least thirty (30) Calendar Days, before a change becomes effective. The Transition

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Plan must be submitted to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u> and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Transition Plan must:

- 1. Explain how the Grantee will ensure service gaps do not occur for current SNAP Education implementation.
- 2. Describe how the Grantee will coordinate and facilitate all transition activities with the outgoing Grantee.
- 3. Describe how the Grantee will work with HHSC to schedule and complete all activities required to maintain service continuity, notwithstanding the transition.

The Transition Plan must also include and address the following:

- 1. Identification, management, and mitigation of risks related to assuming the Grantee responsibilities under the contract and from the outgoing contract holder;
- 2. Comprehensive and detailed step-by-step actions for a successful transition of current operations from the outgoing contract holder to the Grantee, including the respective roles and responsibilities of each in the transition;
- 3. The Grantee's plan of action to ensure uninterrupted service to current consumers; and
- 4. Detailed schedule of continued business operations for all transition functions and requirements.
- I. Turnover Plan

Turnover is defined as those activities that are required of the Grantee to transition contract operations to a subsequent Grantee or to HHSC. During the turnover, the Grantee must ensure that HHSC and the consumers do not experience any adverse impact from the transfer of services to another entity or to HHSC. The Grantee must submit a final turnover plan to HHSC for approval within thirty (30) Calendar Days from the Contract Effective Date, and annually thereafter, sixty (60) Calendar Days prior to the end of each Federal Fiscal Year.

The Grantee must also submit a "ready to execute" Turnover Plan to HHSC for approval, within six (6) months prior to the end of the contract five-year term, contract termination, or as otherwise, requested by HHSC. The Turnover Plan must be updated as needed throughout the term of the contract and submitted for HHSC approval.

The Grantee must complete any change HHSC requires for approval within thirty (30) Calendar Days after HHSC notifies the Grantee of the required change, as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-08. The Grantee must

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Turnover activities must include the following requirements:

- 1. Transfer of information, including data (if applicable); data entry or case file software (if utilized); third-party software and modifications (if utilized); documentation relating to software and interfaces; functional business process flows; and operational information pertaining to the delivery of services to consumers;
- 2. Transfer, with appropriate consents, of all written (including electronic format) documentation, including policies and procedures, case files, emergency, and complaint documentation, and pending or in-progress eligibility determinations;
- 3. Transfer of all training schedules and materials in electronic format including but not limited to:
 - a. development methodology,
 - b. curriculum materials,
 - c. training class statistics,
 - d. outcomes and documentation,
 - e. materials in development and supporting documentation,
 - f. best practice materials,
 - g. all other training and curriculum development documentation and data related to the required training of Grantee staff;
- 4. Comprehensive and complete knowledge transfer to HHSC or to another entity of all practices and procedures utilized in performing all Grant Requirements;
- 5. The implementation of a quality assurance process to monitor turnover activities; and
- 6. Training HHSC and/or successor or Grantee staff in the operation of business processes and any supporting processes related to the Contract.
- 7. The Turnover Plan must delineate the turnover activities the Grantee will conduct through the end of the Contract and for the subsequent six (6) months after the end of the Contract. The Grantee is required to cooperate with HHSC and the successor or Grantee to make available information and experience the Grantee acquired during the Contract term to the extent necessary to assist in a successful transition to the successor or Grantee.

At a minimum, the Turnover Plan must include the following:

- 1. The Grantee's plan for the turnover;
- 2. Defined tasks and subtasks for the turnover, including staffing and resource requirements;
- 3. Turnover schedule;

- 4. Current inventories, correspondence, documentation of outstanding issues, and other operations support documentation;
- 5. Statement of resource requirements that must be met by a successor or HHSC to take over the program, including organization charts and resource requirements necessary to perform the operations of the program;
- 6. Knowledge transfer to successor or HHSC; and
- 7. Any other information needed for an orderly transfer of services.

Upon notification by HHSC that turnover activities are required, the Grantee must complete one hundred percent (100%) of all turnover activities and obtain HHSC approval that all turnover activities have been completed prior to the Grantee's submission for final payment.

J. Quality Management Plan

The Grantee must provide a Quality Management Plan which addresses the activities and plans to ensure that the services provided meets the stated objectives and expectations of HHSC.

The Grantee must submit, implement, and maintain a Quality Management Plan, which includes an overall approach for a comprehensive, continuous, and measurable quality management program. The Grantee must submit the Quality Management Plan to HHSC within sixty (60) Calendar Days from the Contract Effective Date. An updated Quality Management Plan must be submitted annually, thereafter, no later than thirty (30) Calendar Days prior to the end of each Federal Fiscal Year, as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-09. The Grantee must submit the Quality Management Plan to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Quality Management Plan must include, but is not limited, to the following:

- 1. Strategies and processes to promote quality;
- 2. Procedures to periodically measure and report performance to HHSC through the contract; and
- 3. A requirement that the Grantee must supply to HHSC copies of all internal quality assurance audit reports when developed or received by the Grantee.
- K. Security Incident Response Plan

The Grantee must develop and implement a Security Incident Response Plan that provides a coordinated approach to security incidents. The Plan must include a comprehensive process that describes how the Grantee will respond to a security breach

or suspicion of unauthorized access. Handling elements of an incident plan would include preparation, detection and analysis, containment, eradication, and recovery. A Security Incident Response Plan must be submitted to HHSC within twenty (20) Calendar Days from the Contract Effective Date as required in <u>Exhibit C, Required Reports ID</u>, SNAP Ed R-10. The Grantee must submit changes to the Security Incident Response Plan and any changes to the Plan to HHSC at least thirty (30) Calendar Days before a change becomes effective. The Security Incident Response Plan or any changes to the Plan must be submitted to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

A security incident is defined as an occurrence that actually or potentially jeopardizes confidentiality, integrity, or availability of the Grantee's information system and HHSC confidential information. The Security Incident Response Plan must include, but is not limited to, the following:

- 1. Provides the organization with a roadmap for implementing its incident response capability;
- 2. Describes the structure and organization of the incident response capability;
- 3. Provides a high-level approach for how the incident response capability fits into the overall Grantee's organization;
- 4. Meets the unique requirements of the Grantee's organization, which relate to mission, size, structure, and functions;
- 5. Defines reportable incidents;
- 6. Provides metrics for measuring the incident response capability within the organization;
- 7. Defines the resources and management support needed to effectively maintain and mature an incident response capability;
- 8. Is reviewed and approved by designated officials within the Grantee's organization;
- 9. Reviews the incident response plan as significant changes occur in the environment; and
- 10. Updates the incident response plan to address system organizational changes or problems encountered during plan implementation, execution, or testing.
- L. Emergency Plan

The Grantee must develop and maintain an Emergency Plan. An emergency is described as an unforeseen circumstance or combination of circumstances involving a consumer that requires immediate action on the part of the Grantee or results in a consumer's urgent need for assistance or relief.

The Emergency Plan must be submitted within forty (40) Calendar Days from the Contract Effective Date. Ongoing plan updates and changes must be submitted to

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HHSC for approval at least thirty (30) Calendar Days before a change becomes effective, as specified in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-11. The Emergency Plan must be submitted to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Grantee must follow the formal communication process by notifying HHSC of any emergencies via the formal communication process within one Calendar Day after the emergency. Verbal notifications must be to a live person and may not be left on voicemails.

If an emergency occurs with a consumer, the Grantee must maintain the following documentation in the consumer's case file:

- 1. Date and type of emergency;
- 2. Description of the emergency;
- 3. The outcome or resolution of the emergency;
- 4. Name of any persons notified of the emergency and their relation to the consumer;
- 5. Date HHSC was notified; and
- 6. Method of notice
- 7. The Grantee must maintain a log and documentation, as outlined above for the consumer file, of emergencies for three years. The emergency log must be made available upon HHSC's request.
- M. Disaster Recovery and Business Continuity Plan

The Grantee must develop and maintain a written Disaster Recovery and Business Continuity Plan. This Plan must comprehensively describe the Grantee's approach to disasters that could impact the provision of SNAP application assistance, case management services under this Contract, or its ability to meet associated grant requirements. Based on a risk assessment that identifies natural and human-caused disasters in the service area, the Plan will include a continuity of operations business plan. The business plan must address direction and control; warning and communication; emergency financial needs and resource management; safety of consumers, staff, and attendants; continuity or alternative arrangements for essential service functions and the essential service needs of consumer services; critical personnel; and the resumption of operations as swiftly as possible. The Plan must ensure uninterrupted service delivery to the consumers.

If available, SNAP-Ed disaster funds can only be used for SNAP-Ed purposes as approved by HHSC. SNAP-Ed can take place during disaster relief efforts by switching normal education programs to food safety during power outages, cooking without

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running water, or the temperature danger zone and keeping food safe, when to throw it away, etc. These interventions would be SNAP-Ed allowable. All other participation in disaster relief that are not related to SNAP-Ed, such as clean up, Disaster SNAP operations, application assistance, etc. cannot be paid for using the SNAP-Ed grant.

Grantee must submit a Disaster Recovery and Business Continuity Plan within fifty (50) Calendar Days from the Contract Effective Date, or by the date specified by HHSC, and annually, thereafter, within thirty (30) Calendar Days prior to the end of each Federal Fiscal Year, as specified in <u>Exhibit C, Required Reports ID</u>, SNAP Ed R-12. The Disaster Recovery and Business Continuity Plan must be submitted to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u> and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Disaster Recovery and Business Continuity Plan must include the following:

- 1. A strategy for reestablishing operations and service delivery, or implementing alternative arrangements for service continuity to consumers, within twenty-four (24) hours following an unplanned catastrophe that disrupts operations.
- 2. An outline of realistic potential issues, such as natural disasters or cyber-attacks that could debilitate operations, along with a plan of actions to tackle both anticipated and unanticipated problems.
- 3. Details about planning for a disaster recovery site location within the continental United States, alternative arrangements, and procedures for essential decision-making, specifying the disaster recovery sites location and its proximity to the central site.
- 4. Specifications for backup and recovery procedures, including timeframes for restoring full and partial services.
- 5. A contingency plan that addresses interruptions to the established training plan, detailing communication processes, resolutions both short-term and long-term, action steps, and response timeframes.
- 6. Descriptions of documentation and tracking instruments that enable HHSC to verify if performance measures are met during a disaster recovery phase.
- 7. The process for informing HHSC contacts of the initiated disaster recovery and contingency operations.
- 8. A schedule for training staff and consumers and for conducting drills to assess the disaster recovery and continuity plans, which must occur at least annually or more frequently as required by HHSC. After each drill, the Grantee must revise its plan to rectify any gaps or deficiencies identified during the drill.

N. Complaint Resolution Plan

The Grantee must resolve any complaint received against it within ten (10) Calendar Days from the receipt of the complaint, documenting the resolution or planned resolution if the complaint remains unresolved, as part of sound management practices.

The Grantee must submit copies of the complaint reports to HHSC within three (3) Calendar Days. Upon resolution of the complaint, the Grantee must follow the formal communication process by notifying HHSC promptly using the formal communication process to provide an overview of the outcome.

The Grantee must submit a Complaint Resolution Plan to HHSC twenty (20) Calendar Days from the Contract Effective Date, or by the date specified by HHSC. The Grantee must also submit ongoing updates and changes to the plan for HHSC approval at least thirty (30) Calendar Days before any change becomes effective, as required in Exhibit C, Required Reports ID, SNAP Ed R-13. The Complaint Resolution Plan must be submitted to HHSC via the SNAP Education SAR/VAR mailbox (snap ed sar var@hhsc.state.tx.us and carbon copy the SNAP-Ed mail box (snaped@hhs.texas.gov).

In addition to the Complaint Resolution Plan, the Grantee must maintain documentation for all complaints received, along with Complaint Log which includes the following information for each complaint received:

- 1. Date of Complaint.
- 2. Name of Complainant.
- 3. Name of the consumer, if different than complainant.
- 4. Contact information for complainant and/or consumer receiving services.
- 5. Details about the complaint.
- 6. Complaint resolution or planned resolution.
- 7. Name of staff involved in resolution.
- 8. Date resolution was complete.
- O. Grantee Subcontract Agreements

The Grantee must submit copies of the subcontract agreements to HHSC by November 30th of each federal fiscal year, as required in <u>Exhibit C, Required Reports ID</u>, SNAP Ed R-14. The copies of the agreements and budgets must be submitted to the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>). The copies of the subcontract agreements must include a copy of the Data Use Agreement signed by each subcontractor, and the Form 3834, Written Acknowledgement of Completion of Cybersecurity Training Program from the subrecipients to reflect compliance with the cybersecurity training requirement. Copies of all documents submitted to HHSC must be maintained on file and available to HHSC or FNS for review onsite upon request.

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Changes to the Grantee's subcontractors must be approved by HHSC and will require a State Plan approval.

P. Required Posters

The Grantee must display all FNS and HHSC posters at each location where services are provided. This includes, but is not limited to, offices, schools, childcare centers, and community organization sites. The Grantee must ensure that the posters are placed in prominent and accessible areas within each location to maximize visibility to clients and staff. The posters must be maintained in good condition and be current with the latest information provided by FNS and HHSC. The Grantee must upload photos displaying both FNS and HHSC required posters from each location where SNAP-Ed services are provided to the designated SharePoint folder. All photos must be uploaded annually to the designated SharePoint location by the thirtieth (30th) Calendar Day following the first quarter of the Federal Fiscal Year, as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-15. Changes to the site locations will require a submission within fifteen (15) Calendar Days after a change in a site location. The Grantee must notify HHSC of the upload via the SNAP Education SAR/VAR mailbox (snaped@hhs.texas.gov).

Q. Limited English Proficiency (LEP)

The Grantee must provide translated versions of all materials for LEP populations, using USDA-provided translations. SNAP-Ed State and Implementing Agencies must notify Grantees and participants with disabilities and/or LEP individuals of the availability of free language assistance and accommodations. Reasonable steps must be taken to ensure LEP persons have meaningful access to programs, services, and benefits, including providing bilingual program information and interpretation services in relevant project areas.

VI. STAFFING REQUIREMENTS

- A. Key Personnel and Organizational Requirements
 - 1. The Grantee must maintain qualified staff and capacity to adjust their program staffing level to meet the requirements of the contract, applicable state, and federal requirements, and changing HHSC and consumer needs.
 - 2. The Grantee must identify Key Personnel and allocate the percentage of time dedicated to this contract, one percent to one-hundred percent (1-100%) and ensure that if they are dedicated one-hundred percent (100%) to this project they are not permitted to manage, oversee, or participate in other projects or contracts during their SNAP-Ed time.
 - 3. The Grantee is required to report on any restructuring of the organization, or any Key Personnel changes. The Grantee must notify HHSC of any subsequent

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changes within ten (10) Calendar Days of the change, with all updates submitted via the SNAP Education SAR/VAR mailbox

(<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and a carbon copy sent to the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

- 4. The Grantee must ensure that all staff paid with SNAP-Ed funds support the delivery of SNAP-Ed services to the eligible population.
- 5. The Grantee must provide the following information for all paid staff performing SNAP-Ed functions within <u>Exhibit E, Expenditure Proposal:</u>
 - a. Define the required qualifications, skills, and duties of each staff position, including the skills needed to serve the eligible population and individuals who are difficult to serve. Attach an organizational chart listing each staff position title and SNAP-Ed related job duties for each position. This should clearly show how the position supports the delivery of planned SNAP-Ed activities.
 - b. Indicate if a position is full or part-time.
 - c. Full Time Equivalents (FTE) charged to SNAP-Ed: For each position title, provide the FTEs that will be funded through SNAP-Ed.
 - d. Percentage of SNAP-Ed Time Spent on management/administrative duties: For each position title, provide the percentage of SNAP-Ed time the position will spend performing management/administrative duties, including training and professional development.
 - e. Percentage of SNAP-Ed time spent on SNAP-Ed delivery, including all approaches described in the current SNAP-Ed State Plan Guidance. For each position title, provide the percentage of SNAP-Ed time the position will spend on SNAP-Ed direct delivery, multi-level interventions, and community and public health approaches, including PSE efforts. This information should coincide with information provided in the attached statement of work and position description.
 - f. SNAP-Ed Salary Benefits and Wages: For each key position title, provide the total annual salary, total SNAP-Ed salary, benefits, and wages. An estimate may be used for the budget, but actual time spent must be used for billings. These requirements align with the FNS expenditure proposal cost categories that Grantees are required to complete during the application process, in the annual plan, and for the annual report. This section defines those requirements and is designed to assist Grantees in accurately completing Exhibit E, Expenditure Proposal.
 - g. Indicate which positions are filled by paid employees and which are filled by volunteers.
 - h. Include an up-to-date organizational chart showing SNAP-Ed staffing to support the service area and unique populations.

The Grantee must report any staff changes, including agency reorganization, and changes to Key Personnel working on the SNAP-Ed Program. The notification of personnel or organizational changes must be submitted to HHSC no later than ten (10) Calendar Days after a change becomes effective, as required in. The Grantee must submit the changes to Key Personnel to HHSC via the SNAP Education SAR/VAR mailbox (snap_ed_sar_var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov).

B. Staffing Plan

The Grantee must submit a Staffing Plan at the time of application and within thirty (30) Calendar Days after the Contract's Effective Date. The Grantee must report any organizational changes as specified in the Grant requirements that result in a restructure of the organization or redirection of Key Personnel to perform functions other than the responsibilities of their current position, either temporarily or permanently. Key Personnel and/or organizational changes must be reported via an updated Staffing Plan within ten (10) Calendar Days after the change occurs, as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-16. The Grantee must submit the Staffing Plan and any changes to HHSC via the SNAP Education SAR/VAR mailbox (snap_ed_sar_var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov).

The Staffing Plan must ensure:

- 1. Maintenance of a core staff for successful fulfillment of award and performance requirements with experience in systems operations, policy, and procedures, and in the functional areas in which they work.
- 2. Allocation of Key Personnel and their percentage of time to this award approved by HHSC.
- 3. The Grantee must notify HHSC via the SNAP Education SAR/VAR mailbox (snap ed sar var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov) within fourteen (14) Calendar Days that a Key Personnel vacancy will occur for any reason or prior to making any changes in Key Personnel other than changes due to resignation, death, or military recall. The notification must include a plan to recruit Key Personnel.
- 4. The Grantee must notify HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>) within fourteen (14) Calendar Days of any updates to the Grantee's organizational chart as changes in personnel occur, or as otherwise specified by HHSC.
- 5. Availability of appropriate Grantee staff to meet with HHSC, with unrestricted access to Grantee staff by HHSC.

C. Staff Development Plan

The Grantee must develop, maintain, and implement a written Staff Development Plan to develop and enhance the performance of staff responsible for providing services. The Staff Development Plan must be submitted to HHSC at the time of application and no later than thirty (30) Calendar Days from the Contract Effective Date, as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-17. Any updates or changes to the Staff Development Plan must be submitted to HHSC for approval within at least thirty (30) Calendar Days before a change becomes effective. The Grantee must submit the Staff Development Plan and any changes to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Grantee's written plan for staff development must include:

- 1. The total minimum number of training hours required for each staff person to meet minimum competency requirements.
- 2. A schedule for training including the number of hours for each training.
- 3. The training curriculum including specific topics.
- 4. Training objectives.
- 5. The training method.
- 6. A plan to monitor and address staff performance.

The Grantee must provide the following trainings to all staff prior to the staff member providing services:

- 1. Orientation to community resources;
- 2. Grantee's policies and procedures;
- 3. 29 United States Code Section 794 (relating to Nondiscrimination under federal grants and programs);
- 4. Confidentiality of records; and
- 5. Techniques for providing SNAP Nutrition Education and Obesity Prevention Services.
- 6. The Grantee is required to ensure that at least one (1) representative attends each quarterly webinar throughout the year. Attendance at these webinars is mandatory and will be monitored to ensure compliance.

When applicable, the Grantee must document why staff have not been provided with the necessary training within the required timeframe and ensure staff receive ongoing training as needed. The documentation must be maintained in each staff member's file and available to HHSC for review upon request.

VII. PERFORMANCE AND REPORTING

A. Remedies

To ensure compliance by the Grantee and of contracted activities, HHSC may impose contract remedies in accordance with the HHSC Uniform Terms and Conditions or state or federal rules and regulations as applicable.

B. Performance Reports

Timely and accurate reports are an essential functionality of the SNAP-Ed Program for management and oversight. The Grantee must have a reporting and a validation process for all grant requirements and reporting. The Grantee must provide performance reports detailing the Grantee's activities and outcomes. The report must include:

- 1. General observations about the SNAP-Ed program, including any updated nutrition education materials, program needs, program barriers identified, and updated office materials for class instruction;
- 2. Geographical areas reached and primary sites targeted for SNAP-Ed;
- 3. Nutrition education and obesity prevention methods;
- 4. Nutrition education and obesity prevention topics and core elements;
- 5. Evaluation tools and expected program outcomes; and 6. Other reports as defined by HHSC in its sole discretion.
- C. Contract Performance and Compliance Notification

The Grantee must inform HHSC Contract staff within ten (10) Calendar Days after any of the following conditions occurs:

- 1. Problems, delays, or adverse conditions which materially impair the Grantee's ability to meet the Contract objectives or timelines. This disclosure must include a statement of:
 - a. Action taken to address the issues creating delays;
 - b. Action taken to meet Grant Requirements not withstanding those issues;
 - c. Any assistance needed to resolve the situation.
 - d. Date of discovery;
 - e. Duration of the problem, delay or adverse condition;
 - f. Impacts to operations, systems, or staff;
 - g. Root cause for the delay or adverse condition; and
 - h. Immediate corrective action taken and/or the long-term corrective action.
- 2. Legal or financial difficulties (e.g., lawsuit, IRS involvement) that involve the Grantee or could affect the Program;
- 3. Change in location or physical location for Contract-related work (NOTE: This requirement is for Contract purposes. The Grantee must comply with all licensure requirements related to any such change, including earlier, including pre-change, deadlines); or
- 4. Any changes in key contract personnel.

D. Key Performance Requirements

All requirements under the award must be provided at a level of quality acceptable to HHSC. HHSC has identified a list of KPR's, which HHSC will regularly monitor to ensure the Grantee is achieving.

The KPRs will be used to measure the Grantee's successful performance of the services and required reports submissions. All areas of responsibility and all requirements in the contract will be subject to performance evaluation by HHSC. If HHSC determines, in its sole discretion, that the Grantee is failing to provide acceptable services to the SNAP-Ed eligible populations, HHSC reserves the right to invoke remedies that will be included in the grant, as required in <u>Exhibit D, Key Performance Requirements</u>.

Examples of such remedies include, but are not limited to:

- 1. Written corrective action plans;
- 2. Additional reporting;
- 3. Monitoring, which may include site visits to assess performance and compliance;
- 4. Withholding payments;
- 5. Termination or suspension of the grant;
- 6. Any other equitable remedies as provided by Texas law.

HHSC will monitor the performance of Successful Grantees awarded. All grant requirements under the grant must be provided at an acceptable quality level and in compliance with all applicable state and federal laws, statutes, and guidelines.

E. SNAP-Ed Project Activities and Outcomes Report

The Grantee must submit a comprehensive report detailing SNAP-Ed related activities and outcomes by the thirtieth (30th) Calendar Day following the end of each Federal Fiscal Year quarter of service <u>Exhibit C</u>, <u>Required Reports</u> ID, SNAP Ed R-18. This report must include a notification statement confirming that the quarterly PEARS data has been successfully entered into the PEARS system. The comprehensive report and notification must be submitted via the SNAP Education SAR/VAR mailbox (snap_ed_sar_var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov).

The quarterly progress report must include:

- 1. Minimum Reporting Requirements: The Grantee must establish and adhere to minimum reporting requirements, which include regular updates on progress towards meeting relevant State Priority Goals SMART Objectives. Reports should be comprehensive and submitted as specified.
- 2. Summary of Activities: The Grantee must provide a detailed description of all SNAP-Ed related activities conducted during the reporting period, including

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dates, locations, and participants involved. Additionally, the Grantee must report on relevant State Priority Goals and SMART Objectives that reflect the projects goals, considering both budgetary constraints and the needs of special populations.

- 3. Baseline metrics for reach: The Grantee must collaboratively establish baseline metrics with the evaluation team. The baseline metrics must accurately measure the project's impact over time. This involves identifying the initial reach of the project and tracking progress against the baseline.
- 4. Return on Investment (ROI): The Grantee must develop a methodology to calculate and report ROI data, demonstrating the economic efficiency and effectiveness of the project's activities.
- 5. Outcomes and Impacts: Quantitative and qualitative data demonstrating the outcomes and impacts of the SNAP-Ed activities on the target population.
- 6. Challenges and Solutions: Any challenges encountered during the reporting period and the solutions implemented to address these challenges.
- 7. Future Plans: A brief overview of planned activities for the upcoming month and any anticipated challenges.
- 8. Testimonials and Success Stories: The Grantee must collect and include testimonials and success stories from participants and stakeholders to highlight the qualitative impact of the project. The narratives should be included in regular reports and used to support quantitative data. The Grantee must include photo release for any photos and videos submitted.
- F. Quarterly PEARS Reporting Requirements

The Grantee must enter and validate all relevant data in (PEARS) by the thirtieth (30th) Calendar Day following the end of each quarter of service. The Grantee must submit a notification statement confirming the quarterly PEARS data has been successfully entered into the PEARS system. This notification must be submitted via the SNAP Education SAR/VAR mailbox (snap_ed_sar_var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov).

This data must include, but is not limited to:

- 1. Participant Data: Comprehensive details on participants served, including demographics, attendance, and participation levels.
- 2. Activity Data: Detailed records of SNAP-Ed activities conducted, including descriptions, dates, locations, and resources used.
- 3. Outcome Data: Quantitative and qualitative data reflecting the outcomes and impacts of SNAP-Ed activities on the target population.
- 4. Performance Measures: Key performance indicators as outlined in the project's goals and objectives.

The Grantee must ensure the accuracy and completeness of the data entered. The data must be validated to meet the standards set forth in the program guidelines.

Integration and Submission: The Grantee is required to streamline the reporting process by combining the submission of the Quarterly Progress Report with the notification that the Quarterly PEARS data has been entered into the PEARS system, as outlined in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-19. This combined submission must be completed and submitted to HHSC via the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>.) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>) by the thirtieth (30th) Calendar Day following the end of each previous quarter of service. The combined submission must include the Quarterly Progress Report, which must detail all required progress narratives and narrative descriptions as specified above, along with a notification statement confirming that the quarterly PEARS data has been successfully entered into the PEARS system.

G. SNAP-Ed Implementing Agency Annual Plan

The Grantee must use the National Program Evaluation and Reporting System (N-PEARS) to submit the SNAP-Ed Implementing Agency Annual Plan for approval by March 1st of each Federal Fiscal Year or by the date established by HHSC, as required in Exhibit C, Required Reports ID, SNAP Ed R-20. The Grantee must notify HHSC via email to HHSC via the SNAP Education SAR/VAR mailbox (snap ed sar var@hhsc.state.tx.us) and carbon copy the SNAP-Ed mailbox (snaped@hhs.texas.gov). The Grantee must send notification to HHSC that the SNAP-Ed Implementing Agency Annual Plan has been uploaded to NPEARS, no later than May 1st, of each Federal Fiscal Year. If there is an Amendment to the Annual Plan, the Grantee must submit a request to HHSC for approval for a State Plan Amendment no later than January 15th.

H. SNAP-Ed Implementing Agency Annual Report

The Grantee must submit all relevant data in PEARS by October 15th of each Fiscal Year and send notification to HHSC that all PEARS data is complete. Grantee must also utilize N-PEARS to submit the SNAP-Ed Implementing Agency Annual Report for approval by October 31st of each Federal Fiscal Year, as required in <u>Exhibit C,</u> <u>Required Reports</u> ID, SNAP Ed R-21 and send notification to HHSC that the SNAP-Ed Implementing Agency Annual Report has been uploaded to NPEARS via email to the SNAP Education SAR/VAR mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

VIII. BUDGET AND INVOICING

A. Expenditure Proposal – Budget (Exhibit E)

The Grantee must submit an Expenditure Proposal (categorical budget) at the time of Application, and thirty (30) Calendar Days after the Contract Effective Date as applicable, and annually thereafter as part of the annual State Plan submission, by the date specified by HHSC, as required by the grant terms. The Annual Categorical Budget must be submitted to HHSC via the SNAP Education SAR/VAR Mailbox

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(<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Grantee must complete and submit the categorical budget on the template provided and by the date specified by HHSC, upon issuance of the Notice of Funds Available (NFA) and budget submission deadline.

B. Invoicing

The Grantee must submit monthly requests for reimbursement (RfRs) to HHSC in accordance with contractual requirements, unless otherwise specified in the contract. Grantee must submit monthly requests for reimbursement or payment, by the thirtieth (30th) Calendar Day of each month following the month in which expenses were incurred or services provided. For months with less than thirty (30) Calendar Days, the invoice must be submitted on the last day of the month as required in <u>Exhibit C, Required Reports ID</u>, SNAP Ed R-22. The Grantee must submit a monthly invoice and documentation supporting the expenditures incurred for the provision of services via email to the AES Invoice Mailbox (<u>aes.invoices@hhsc.state.tx.us</u>) and carbon copy the HHSC SNAP Education SAR/VAR Mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>).

The Grantee may not include expenditures for months other than the month for which reimbursement is being requested.

- 1. Grantee may submit a supplemental invoice in accordance with the instructions and template provided by HHSC.
- 2. To initiate the review and approval process, Contract Operations must receive the following attachments with prescribed nomenclatures:
 - Completed Vendor Action Request:
 - 1. Agency Specific Information
 - 2. Detailed Information
 - 3. Background Discussion
 - 4. Action Required/Recommendation
 - 5. Attachment Description
 - 6. Request for Reimbursement Template
 - 7. Supporting documentation
- 3. The following naming convention must be used for the subject line of the email:

"Legal Entity Name. Invoice Number. Month and Year." Do not add any unique characters such as hashtags, asterisk, etc. For example, an invoice submitted for the month of September would look like this: "ABC Company Invoice 01 September 2025"

The following must be included on the invoice:

1. Grantee's Legal Name

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- 2. State of Texas Vendor number or federal tax Identification number
- 3. Mail Code
- 4. Remit-to address
- 5. Grantee's Telephone number
- 6. Invoice number
- 7. HHSC Contract Number
- 8. State agency name of requestor
- 9. Description of goods and services provided
- 10. Service Date
- 11. If a subcontractor(s) is required to provide SNAP-Ed documentation, an attached Explanation of Service ("EOS") for the subcontractor(s) services rendered.
- 12. The name and telephone number of a person designated by the Grantee to answer questions regarding the invoice.
- 13. Supportive documentation supporting the services and substantiating costs incurred for the invoice provided to HHSC.
- 4. The Grantee must use the HHSC template provided to report costs requested for reimbursement from HHSC and costs to be matched (if applicable). Costs must be broken out to a degree sufficient to determine if they are reasonable, allowable, and necessary for the project's successful performance, in accordance with the allowable activities.
- 5. Final payment must be based on the information provided by the Grantee no later than forty-five (45) Calendar Days after the end of each Federal Fiscal Year. This payment provision must also apply to the final payment whether at the award period's completion or in the event of early award termination.
- 6. Supporting documentation is required with all requests for reimbursement or payment. HHSC must conduct routine monitoring of all program and post-payment invoice reviews to ensure compliance with contractual requirements. The proper review of invoices provides assurances that the Grantee is paid timely and accurately. Before HHSC can initiate the payment process, proper research, review, and acceptance of performed service must occur. HHSC may need to get necessary documentation from the Grantee to make this decision.

To provide evidence of the activities implemented or services provided, the Grantee must include the supporting documentation for the request for reimbursement or payment request submitted to HHSC and must include the following:

1. The general ledger (GL) is the central repository for transactions from the Grantee's financial applications - Accounts Payable, Payroll, and other local interfaces. The general ledger with Summary Page must include only the funding sources and expenditures for the program. The GL Summary Page must include current and cumulative charges by major cost categories: direct

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labor, overhead, travel, Equipment, other direct costs, and indirect costs associated with the project. To guarantee accurate recording of each transaction, it is necessary for HHSC to reconcile the general ledger submitted by the Grantee with the supporting documentation such as ACH statements, receipts, checks, and invoices from subcontractors or subrecipients. The entries in the accounting records must correspond with the supporting documentation.

- 2. The review of the general ledger and its associated documentation will consist of the following.
 - a. Any modifications in the staff composition of the organization, namely in key staff and programmatic positions and contracting address locations.
 - b. Overlapping service months and performance periods.
 - c. Reporting of general staff and executive salaries, fringe benefits, and other related compensatory elements.
 - d. Clearly distinguishing between direct costs and indirect costs. It is imperative to clearly delineate cost categories and ensure their alignment with the approved annual budget.
 - e. Accurately calculating the total budget and monitor budget balances.
 - f. Identifying Chart field, appropriate fiscal year, the categorizing of funds based on several identifiers, including cost centers, department codes, GL codes, GL title, approved FNS cost categories by program, Effective Date of the performance activities, transaction description, debit, and credit all must be clearly defined on the GL.
 - g. It is imperative that the debits and credits recorded in the GL correspond precisely to the expenditures outlined in the cost categories specified on the Request for Reimbursement template.
 - h. Contract Operations is required to promptly notify the Grantee of any mistakes, omissions, or other issues that require attention via a SAR. An erroneous or deficient general ledger might potentially result in an incorrect invoice, necessitating its return to the Grantee for corrections.
- 3. Timesheets. Personnel payroll expenses, regardless of whether they are paid directly or indirectly, must be derived from recorded payrolls that adhere to the Grantee's accounting rules and practices and have received approval from a responsible official within the organization. Contract Operations <u>may request</u> timesheets to verify and validate expenditures. The requirement can be fulfilled by utilizing traditional timesheets or similar forms of documentation that adhere to the following criteria:

- a. The documentation should accurately reflect the allocation of time after the completion of each activity.
- b. It should account for the entirety of the employee's compensated activities within the organization, regardless of whether they are funded by awards or non-award sources.
- c. The documentation should clearly identify the different cost objectives and the amount of time the employee spent on each cost objective on a daily basis.
- d. It should provide support for the distribution of employee wages if they are allocated to specific cost objectives. Additionally, the documentation should include information regarding the employee's actual rate of pay.
- 4. Non-employee/student and work-study program. If non-employees and students are performing work for SNAP-Ed, they can be compensated through the SNAP-Ed grant as long as time sheets are used to record the non-employee or student's time and activities. If this work was required as part of their work-study agreement, it should be paid for as part of their regular duties through the work study program. Discussions between the work-study program and the IA must determine this.
- 5. Itemized Receipts. The source documentation must include a comprehensive explanation of the cost, encompassing the date of spending, the specific cost per item and total cost, and the corresponding general ledger account number that was charged. The supporting documentation may encompass several items, such as travel records, time sheets, purchase orders, receiving reports, invoices, contracts, mileage records, billing records, telephone bills, and any other relevant material that serves to confirm the relevance to the contract and provide evidence of payment. The Grantee must include all subrecipient/subcontractor reimbursement invoices to support expenditures.
- 6. Travel costs refer to the financial outlays associated with transportation, accommodation, per diem, and other relevant expenditures that are accrued by personnel who are engaged in official SNAP Education activities on behalf of the Grantee. The assessment of these travel charges can be conducted by considering either the actual expenditures incurred or by utilizing a daily allowance (per diem) or mileage basis (mileage rates). Travel cost must comply with the state, federal, and the Grantee's written travel reimbursement policies.
- 8. Travel Receipts and Mileage Logs. The SNAP Education program allows for the reimbursement for travel expenses associated with the program. The reimbursement rate for miles traveled is set at an annual federal rate. Reimbursement for transportation expenses incurred by a traveler in support of their participation in these programs may include bus passes, taxi rides, and/or rideshare services. It is important to note that while these expenses are eligible

for reimbursement, it is not permissible to seek reimbursement for tips associated with these services.

- 9. For example, when using Uber, Lyft, or another transport-sharing service, the total ride cost is reimbursable (less the gratuity). Distance/mileage, price, gratuities, tolls, fees, etc. are displayed in detail on the Lyft and Uber applications' receipts. It is necessary to retain all legitimate receipts and include them with each reimbursement request.
- 10. The Grantee is required to create and maintain mileage logs for every individual traveling to monitor the project activities, distance traveled, initial location, intermediate locations, and final destination physical addresses. It is a requirement that all travel receipts and mileage logs be included in each reimbursement request.
- 11. Toll and Road Charges. As per the regulations outlined in CFR 200.475, tolls roads are deemed permissible expenditures, in addition to mileage costs. The determination of toll payment should be based on the Grantee's existing travel policy. However, Texas Administrative Code (TAC) Rule Title 34 Part 1 Chapter 5 Subchapter C Rule State Statue 5.222 b (3) reads a state agency may not reimburse a state employee for any costs or expenses in excess of those incurred for official travel that result from a state employee's personal preference or convenience. A budget revision may be required if toll and road charges are not included in the travel budget.
- 12. Types of Equipment Purchases
 - a. Capital expenditure: Funds spent on purchasing or maintaining land, buildings, and equipment.
 - b. Equipment: A tangible property with a useful life of one year or more and a unit acquisition cost that equals or exceeds \$10,000.
 - c. Property: This includes both real property (land and buildings) and personal property (tangible and intangible).

Equipment and Capital Equipment - The Grantee must submit a written request to HHSC for prior approval to the purchase of capital equipment and controlled assets included in the budget via a Capital Equipment (CE) and Controlled Asset (CA) Request process. Capital expenditures for special purpose equipment are permissible as direct expenses if they have the previous written consent of the HHSC Access and Eligibility Services (AES) and have a unit cost of \$10,000 or more. Equipment and other capital expenditures are unallowable as indirect costs.

Capital Equipment and Controlled Asset requests require three bids unless the Grantee is using a Department of Information Resources (DIR) vendor. If the Grantee is using a DIR vendor and submits only one bid, the Grantee must include a statement in the VAR stating that the Grantee is using a DIR vendor and includes only one bid.

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The following are the thresholds for the capital equipment and controlled assets. Controlled asset items valued below \$500 do not require HHSC approval but must be included in the agency budget and tracked in the Grantee's inventory. The Grantee must maintain an inventory log that reflects details such as property ID, disposal date, acquisition date, serial number, funding source used, and total cost, etc.

The Grantee must submit an HHSC Inventory Control Log which must include all controlled assets and capital equipment purchased with HHCS funds. The CE/CA Request Log and HHSC Inventory must be reconciled at the end of each fiscal year closeout. The HHSC Inventory Log and final Capital Equipment and Controlled Asset Log Request Log will be due by October 15th, following the fiscal year end.

- 13. Non-Capital Equipment and Supplies A single item (not an invoice) with a price between \$500 and \$4,999 that is freestanding and has a use life of one year or more is referred to as non-capital equipment. Supplies generally do not require specific approvals, aside from the budget; however, HHSC may request additional supporting documentation to validate the purchase of supplies.
- 14. Property Management Inventory and Maintenance. Grantees must take a physical inventory of their equipment and reconcile the inventory with the property records at least once every two (2) years. Inventory reconciliation should comprise verification of each item's existence, present consumption, and continuing requirement. Grantees must create and implement maintenance procedures to keep their equipment/property in good condition. A system should also be in place to prevent loss, damage, and theft.
- C. Supplemental Invoices

If the Grantee has received reimbursement for a service month but finds additional incurred expenses that were not included in the original invoice submission, the Grantee must submit a supplemental invoice by the thirtieth (30) Calendar Day of the month. The Grantee must submit a monthly invoice and documentation supporting the expenditures incurred for the provision of services via email to the AES Invoice Mailbox (aes.invoices@hhsc.state.tx.us) and carbon copy the HHSC SNAP Education SAR/VAR Mailbox (snap_ed_sar_var@hhsc.state.tx.us) and the SNAP-Ed mailbox (snaped@hhs.texas.gov). Grantee must use the nomenclature in the example below.

Example: The Grantee received reimbursement for the service month of November. However, the Grantee has additional expenses that were incurred in November. These expenditures were not recorded in the original submission to HHSC. The Grantee must submit a supplemental invoice to HHSC by the thirtieth (30th) Calendar Day of the month to receive reimbursement. The nomenclature for supplemental invoices must include the original invoice number, month of service (abbreviated), and the

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abbreviation of the word supplemental and a number and/or letter as the suffix (e.g., ABC Company 12345 Nov. 2025 Sup 1, or ABC Company 12345 Nov. 2025 Sup A, or ABC Company 12345 Nov. Sup 1a)

- 1. HHSC requires supporting documentation to substantiate each element of an expenditure, including expenditures claimed for match. The Grantee must maintain adequate records and provide the necessary documentation to show clear proof of an allowable expenditure. Upon HHSC's request, the Grantee must provide additional information to the degree or detail necessary to resolve any review, examination, inquiry, or audit by HHSC or other responsible authority. The Grantee must certify that payments requested are in accordance with applicable contract provisions, laws, and regulations and that the grant requirements have been met.
- 2. The Grantee must provide assurances that the Grantee's cost of activities is not funded from another federal source. In addition, HHSC does not provide startup funding or issue advance payments.
- D. Budget Revisions

The Grantee must report deviations from the approved budget, project scope, or objective in accordance with the FNS Guidelines, grant requirements, and the instructions provided by HHSC. Grantee must request written prior approval from HHSC for budget and program plan revisions, to include budget revisions for third-party Subrecipients, in accordance with Code of Federal Regulations (CFR) Title 2, Subtitle A, Chapter 2 Part 200, Subpart D 200.208 Specific Conditions; and Title 7, Subtitle B, Chapter 2 Part 272, Subchapter C 272.2(f) Revision and as referenced in Exhibit C, Required Reports ID, SNAP Ed R-23.

The Grantee may need to move funds in the approved detailed line-item budget from one (1) budget category to another or within a budget category during the grant year.

Revisions to the approved Grantee detailed line-item budget, will require <u>moving more</u> <u>than five percent (5%)</u> of the grant funds of the total budget, will require the prior written approval, by HHSC, and submission of a completed Budget Revision Request Form, updated expenditure proposal, VAR with justifications and reason for needing to revise the agency's budget. This will require a state plan amendment and will need to be approved by HHSC and FNS. This will require an HHSC Contract Amendment.

Budget Revisions - The Grantee is allowed one SNAP-Ed Annual Plan Amendment and budget revision over five percent (5%), which must be submitted prior to January 15th of the current fiscal year. The Grantee is allowed one other budget revision below five percent (5%), which must be submitted prior to April 1st of each fiscal year. If no Budget Revision over the five percent (5%) that will result in an Annual Plan

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Amendment is needed, the Grantee is still required to complete the Budget revision form and acknowledge that no Budget revisions are needed.

Revisions to the approved Grantee detailed line-item budget, which require moving <u>five percent (5%) or less</u> of the total budget, and will require the prior written approval, by HHSC, and submission of a completed Budget Revision Request Form, updated expenditure proposal, VAR with justifications and reason for needing to revise the agency's budget. This will not require a state plan Amendment and can be approved by HHSC.

The Grantee must request prior written approval from HHSC for the following program or budget-related reasons:

- 1. Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval);
- 2. Change in a key person specified in the application or the Federal award;
- 3. The disengagement from the project for more than three months, or a twenty-five percent (25%) reduction in time devoted to the project;
- 4. The transfer of funds budgeted for participant support costs to other categories of expense.
- 5. The sub awarding, transferring, or contracting out of any work under a federal award, including fixed amount subawards;
- 6. Changes in the approved cost-sharing or matching requirements;
- 7. The revision indicates the need for additional Federal funding;
- 8. The revision cannot exceed five percent (5%) of the Grantee's cumulative total program budget without written prior approval from HHSC and the Federal awarding agency for each Fiscal Year;
- 9. The revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct cost;
- 10. The revisions pertain to the addition of items requiring prior approval by FNS in accordance with the provisions of the applicable cost principles specified 2 CFR part 200, subpart E and USDA implementing regulations 2 CFR part 400 and part 415; and
- 11. No other changes to the Grantee's fund budget require approval from the Federal awarding agency.
- E. Quarterly Expenditure and Projection Report

The Grantee must submit a Quarterly Expenditure and Projection Report by the tenth (10th) Calendar Day of the month following the quarter being reported, as specified by HHSC, and using the approved HHSC Template. The Quarterly Expenditure and Projection Report must include the reimbursed expenditures of each month by cost category. If the Grantee has not submitted an invoice for a particular service month, the

Grantee must estimate the expenditures for that month. The Quarterly Expenditure and Projection Report must be submitted to HHSC via the SNAP Education SAR/VAR Mailbox (<u>snap_ed_sar_var@hhsc.state.tx.us</u>) and carbon copy the SNAP-Ed mailbox (<u>snaped@hhs.texas.gov</u>) as required in <u>Exhibit C, Required Reports</u> ID, SNAP Ed R-24.