



# TEXAS

## Health and Human Services

**Cecile Young, Executive Commissioner**

**Exhibit D, SNAP Outreach Contract Requirements**

## **I. OVERVIEW**

The SNAP Outreach Program engages Texas communities to raise awareness about the Supplemental Nutrition Assistance Program (SNAP) and assist potentially eligible individuals in applying for benefits. By partnering with a network of community-based organizations, the program educates low-income households about eligibility requirements, application procedures, and available services, helping to reduce food insecurity, hunger, and poverty across the state. Grantees and their Subrecipients will implement outreach and application assistance services, while utilizing HHSC-approved tools such as YourTexasBenefits.com, the Your Texas Benefits mobile app, and electronic document submission to support Texans in pursuing economic and personal self-sufficiency.

## **II. MANAGEMENT REQUIREMENTS**

### **A. General**

Grantee must provide services that improve targeted state or community-level factors and contribute to state and local outcomes, such as increased food security, improved access to services for low-income households, or reduced disparities in SNAP participation across diverse communities.

### **B. SNAP Infrastructure**

#### **1. Physical Location and Hours of Operation**

Grantee must maintain a physical SNAP 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](#).

#### **2. Additional Holidays**

Grantee may observe additional 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 Outreach SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).

#### **3. General Insurance Requirements**

Grantee must carry insurance in the types and amounts in accordance with the requirements in **Exhibit Q, Insurance Requirements** through the duration of the Contract. Grantee must submit evidence as required by HHSC of the required coverage to HHSC, within fifteen (15) Calendar Days after the Contract Effective Date and annually, by October 31<sup>st</sup> (See **Exhibit L, Deliverable, D-01**). The copies of the policy documents must be submitted to the SNAP Outreach SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).

### **C. SNAP Services**

1. To meet the goals of the SNAP Outreach and Application Assistance Program, Grantee must implement the required activities, which may include conducting outreach to eligible populations, providing application assistance, educating clients about SNAP benefits, and collaborating with local partners to increase program awareness and participation.
2. Grantee must:
  - a. Have the existing infrastructure to support the activities and grant requirements set forth in this Contract. This includes physical locations, staffing, systems support, and other elements necessary to support operations. Funding is not intended and may not be used for start-up operations;
  - b. Develop and implement a robust Client satisfaction process to assess the quality of services provided and identify any service gaps that must be addressed;
  - c. Ensure Client data and Confidential Information is protected as outlined in **Exhibit G, Data Use Agreement (DUA) Governmental Entity Version 8.5**;
  - d. Ensure all staff and volunteers complete the background check process and HHSC Community Partner Program (“CPP”) certification training within fifteen (15) Calendar Days from the Contract Effective Date or upon their hire date.
  - e. Ensure staff and volunteers complete annual recertification training to avoid being de-provisioned from access to the HHSC systems;
  - f. Ensure that all Subrecipients establish a partnership with HHSC to become a level IV Community Partner in accordance with the requirements in **Section III(E)(1) Community Partner Program** of this Exhibit D; and
  - g. Participate in monthly meetings with HHSC to address any program issues that may impact program performance and Contract compliance.

#### **D. Formal Communication**

1. Grantee must use the formal communication process established by HHSC for receipt and response to requests for information, Work Products, Deliverables, updates, and other required correspondence related to performance of Contract requirements. HHSC will issue State Action Requests (“SARs”) to Grantee following established procedures and timelines. Grantee must issue Vendor Action Requests (“VARs”) to HHSC following established procedures and timelines, inclusive of the submission of Contract Deliverables and Key Performance Requirements.

2. In addition to the requirements stated above, Grantee must:

- a. 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;
- b. Submit a written request for permission for a late submission of a SAR request deadline that specifies the estimated date of completion and reason for the request for an extension no later than three (3) business days after receipt of the SAR request;
- c. 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; and
- d. Submit all communications related to the Contract to the SNAP Outreach SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)), unless otherwise stated in the Contract.

**E. Communication Plan and Governance Structure and Monthly Governance Meetings**

1. Grantee must develop and implement a Communication Plan and Governance Structure to provide administrative oversight and support for program discussions and decision-making between HHSC and Grantee. The Communication Plan and Governance Structure must be submitted to HHSC within fifteen (15) Calendar Days after the Contract Effective Date, and annually thereafter, thirty (30) Calendar Days prior to the end of each Fiscal Year (see **Exhibit L, Deliverable, D-02**). The Communication Plan and Governance Structure must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
2. **Communication Plan and Governance Structure**. The Communication Plan and Governance Structure must include the items below. The list is not all inclusive, Grantee may include additional details to align with their internal communication and program policies and procedures.
  - a. A list of Grantee's personnel required to attend the monthly governance meetings; include name, position, project responsibilities, and email address.
  - b. A list of Grantee's personnel authorized to request and receive information and to be included in correspondence from HHSC; include name, position, project responsibilities, and email address.
  - c. A proposed schedule and structure of the monthly governance meetings for this project.
3. **Monthly Governance Meetings**. Grantee must participate in monthly governance meetings with HHSC. Grantee must collaborate with HHSC to develop the meeting schedule. Grantee's identified personnel or their designee(s) must attend all scheduled in-person or virtual meetings. Additionally, Grantee must:

- a. Develop and submit agendas for all scheduled meetings via the official SAR/VAR correspondence process five (5) business days prior to each meeting unless deviation is requested in advance and approved by HHSC.
- b. Ensure the monthly meeting agenda includes, at a minimum, status updates on meeting Key Performance Requirements (“KPRs”) and objectives, status updates on specific activities in Grantee’s Work Plan, any successes, challenges, or barriers potentially impacting programmatic activities, best practices, and lessons learned (as applicable).
- c. No later than five (5) business days after each meeting, submit meeting minutes via official SAR/VAR correspondence mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)) for review, comment, and approval by HHSC.

#### **F. Contract Monitoring Questionnaire**

Grantee must comply with all applicable cost principles, audit and contract monitoring, and administrative requirements in accordance with the Contract, contract management guidelines, and state and federal 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 Grantee’s internal and financial controls and other general contracting processes. Grantee must submit a CMQ thirty (30) Calendar Days after Contract Effective Date and annually thereafter, sixty (60) Calendar days prior to the end of each Fiscal Year (see **Exhibit L, Deliverables, D-03**). The CMQ must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).

### **III. PROGRAM REQUIREMENTS**

#### **A. Overview and General Requirements**

1. Grantee must provide services that supports the increase the number of SNAP-eligible individuals and families receiving benefits and helps them navigate and manage the benefit application process.
2. Grantee must:
  - a. Grantee must implement all of the strategies described in Sections II(B) – (D) of this Exhibit.
  - b. Provide comprehensive application assistance services in client expressed primary languages to remove barriers to access for individuals not comfortable speaking, reading, or writing in English or Spanish for SNAP-eligible populations in Texas both in-person and virtually;
  - c. Promote the use of self-service tools and resources such as YourTexasBenefits.com, Your Texas Benefits mobile app, electronic document uploads, and electronic correspondence.), as well as the

election of electronic notices;

- d. Implement strategies prescribed by HHSC to improve services to priority populations that include historically underserved communities including veterans, college students, older adults, immigrant communities, and mixed-status families;
- e. Identify community needs and determine the program's capacity to address the needs of the population served its strengths, and the challenges faced in meeting the service needs of those served;
- f. Provide all services in compliance with the Supplemental Nutrition Assistance Program State Outreach Plan Guidance (see **Exhibit O, Supplemental Nutrition Assistance Program (SNAP) State Outreach Plan Guidance**).
- g. Grantee must provide services in all the counties in the Region they serve (the Regions and associated counties can be found in **Exhibit R, Funding by Region and Strategy & Regional Population**). Grantee must have a presence and offer services in every county within their proposed Region(s) to help ensure all counties have access to SNAP outreach and application services.

**B. Strategy 1: Formal Network Providing Application Assistance and Education**

- 1. Grantee must follow and document their procurement processes to establish a network of Subrecipients specifically aligned to effectively meet diverse community needs and provide assistance to individuals applying for SNAP, healthcare, food, and cash assistance through the HHSC online portal, YourTexasBenefits.com. Grantee and its network of Subrecipients must conduct informational outreach activities and provide resource assistance to educate individuals, families, and communities about the application process, availability of benefits and the eligibility criteria.
- 2. **Formal Network providing Application Assistance.**
  - a. Grantee must establish and maintain a formal network with a minimum of five (5) Subrecipients with the capacity to provide comprehensive application assistance and limited case management services to populations potentially eligible for SNAP benefits.
  - b. Grantees must ensure Subrecipients maintain a ninety-five (95) percent staffing level throughout the Contract (see **Exhibit K, Key Performance Requirements**). Staffing level is determined by the total number of current personnel divided by total number of personnel reported in the [Key Personnel and Organizational Requirements].
- 3. **Formal Agreements with Subrecipients**
  - a. Grantee must establish and maintain formal agreements between Grantee and their Subrecipients detailing each party's roles and responsibilities in carrying

out Contract requirements within ninety (90) Calendar Days from the Contract Effective Date and submit copies of the Subrecipient agreements and attachments within thirty (30) Calendar Days from the date of execution of the applicable Subrecipient agreement and annually, thereafter (see **Exhibit L, Deliverables, D-04**). Attachments must include but are not limited to: Subcontractor Agreement Form of the HHS Data Use Agreement (DUA), Civil Rights Training, and Cybersecurity Training.

- b. The executed Subrecipient agreements must address the security and protection of Client information to ensure compliance with HHSC standards, the requirements set forth in the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and cybersecurity measures.
- c. The agreements must be renewed annually or in accordance with the agreed terms to ensure the agreements are current and effective through the duration of the Contract. Grantee must submit copies of these renewed agreements to HHSC annually.
- d. Grantee(s) must submit prospective Subrecipients for HHSC review and approval prior to finalizing Subrecipient formal agreements via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- e. HHSC must be notified in writing at least thirty (30) Calendar Days prior to the termination of a Subrecipient agreement by either party. The notification must include:
  - i. Name of the party that initiated the termination of the Subrecipient agreement;
  - ii. The date the termination of the Subrecipient was initiated;
  - iii. The counties impacted; and
  - iv. Grantee's plan to secure a new Subrecipient agreement and ensure there are no gaps in services.

#### **4. Staff and Volunteer Training**

- a. All staff and volunteers providing services to clients must have the knowledge and skills to provide comprehensive application assistance services. Staff and volunteers must complete specific training required by HHSC to become provisioned to access HHSC systems. The training must be completed within ten (10) days after the date of hire to obtain certification and annually, thereafter, for recertification. Training will include, but is not limited to, sessions on:
  - i. HHSC's online application website, [YourTexasBenefits.com](http://YourTexasBenefits.com);
  - ii. The benefits programs administered by HHSC;
  - iii. CPP certification and recertification;
  - iv. Civil rights training;

- v. Protection of Client data and cybersecurity; and
    - vi. Other training required by the organization or HHSC.
  - b. Grantee must ensure all officers, employees, agents, volunteers, and subcontractors with direct access to a state computer system or database complete a certified cybersecurity training program. “Access” is defined as any person who has been given an account to access any state information system at full or limited capacity. Grantee must submit a Form 3834 Written Acknowledgement of Completion of Cybersecurity Training Program, annually, no later than October 15th of each Federal Fiscal Year. Grantee must also maintain certificates of completion for all individuals required to complete the training and available to HHSC for review upon request.
  - c. Grantee must ensure all individuals involved in the SNAP Outreach Program, including managers, supervisors, frontline staff, volunteers, and subcontractors complete an annual Civil Rights training approved by HHSC and FNS, within fifteen (15) Calendar Days from the date of hire, and annually, thereafter. Grantee must maintain training certificates in the staff member’s employment file and available to HHSC for review upon request.
  - d. Grantee must maintain a copy of all training records for each employee and volunteer on file and available for HHSC review upon request.
5. **Technical Assistance.** Grantee must provide technical assistance through in-person visits, email, telephone, and virtual platforms, such as Teams, Zoom, webinars, etc. to its Subrecipients to ensure it has the support to conduct the activities set forth in the Work Plan. Technical assistance includes the provision of programmatic information and support, as well as troubleshooting and escalating any policy, programmatic, and IT issues that require HHSC follow-up or assistance with the HHSC data system such as YourTexasBenefits.com or the Community Partner Program (CPP) Partner Portal. Grantee must document all technical assistance efforts and maintain them on file and available to HHSC for review upon request.
6. **Documented Procedures.** Grantee must develop and implement policies and procedures for providing the quality services requested. Grantee and their Subrecipients must be apprised of and fully implement these policies and procedures. Grantee and its Subrecipient must maintain current policies and procedures on file and available to HHSC for review upon request.
7. **Network Monitoring Plan.**
- a. Grantee must monitor Subrecipients regularly to ensure services are provided according to documented policies and procedures and in accordance with the Contract requirements. Grantee must develop a Network Monitoring Plan to ensure all Subrecipients are monitored. Grantee must submit the Network Monitoring Plan to HHSC for review and approval within sixty (60) Calendar Days after the Contract Effective Date and



- annually, thereafter sixty (60) Calendar Days prior to the end of each Fiscal Year (see **Exhibit L, Deliverables, D-05**). Grantee must implement the Network Monitoring Plan as approved. Any changes to the Network Monitoring Plan must be submitted to HHSC for review and approval thirty (30) Calendar Days prior to implementing the changes. The Network Monitoring Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- b. Grantee must document, maintain and make available to HHSC for review upon request the following items:
    - i. The process and risk assessment used by Grantee to monitor its Subrecipients;
    - ii. A current monitoring schedule;
    - iii. All monitoring activities, including on-site visits; and
    - iv. The Final Monitoring Report.
  - c. The Network Monitoring Plan must detail Grantee's plan to:
    - i. Develop a risk assessment process to evaluate Subrecipients' programmatic, financial, and contractual performance as a precursor to determining which organizations will be monitored during the fiscal year, the level of review that will be conducted, and if the monitoring will be on-site or a desk review. The Grantee must maintain the process and risk assessment on file and available to HHSC for review upon request.
    - ii. Develop and execute a monitoring schedule. Grantee must maintain a current monitoring schedule on file and available to HHSC for review upon request.
    - iii. Conduct and document all monitoring activities, including on-site visits (see **Section III(B)(7)(b)** above).
    - iv. Develop and provide the Final Monitoring Report with the outcomes and recommendations to the Subrecipients and maintain the monitoring records and reports on file and available for HHSC review upon request. The Final Monitoring Report must include best practices identified and lessons learned.
    - v. Conduct and document follow-up activities, technical assistance, and outcomes when a Subrecipient's risk assessment or monitoring report indicates identified findings and/or a pattern of errors. The Grantee must document and maintain all monitoring activities on file and available on file and available to HHSC for review upon request.
  - e. The HHSC-approved Network Monitoring Plan must be implemented by

Grantee.

- f. Grantee must submit a Quarterly Monitoring Report in a form provided by HHSC by the twentieth (20<sup>th</sup>) Calendar Day following the quarter being reported (see **Exhibit L, Deliverables, D-06**). The Quarterly Monitoring Report must be submitted via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)). The Quarterly Monitoring Reports must include:
  - i. A monitoring report for each Subrecipient monitored within the quarter being reported;
  - ii. A list of any findings and required corrective action plan(s); and
  - iii. All follow-up activities completed to ensure the Subrecipient implemented the corrective action plan completed the corrective action and is following the requirements in the Contract to ensure compliance.

## **C. Strategy 2: Application Assistance and Education**

### **1. Direct Application Assistance.**

- a. Grantee must provide comprehensive direct application assistance to Texas residents seeking SNAP benefits. This assistance will be offered through both in-person and virtual channels to ensure accessibility. Services must include guiding applicants through the application process, aiding in the collection of required documentation, and conducting informational activities to inform potential applicants about SNAP eligibility and application procedures.
- b. Comprehensive application assistance encompasses support with initial SNAP applications, recertifications, and mid-certification report forms, offered in multiple languages to ensure inclusivity. The Grantee and their Subrecipients will conduct informational activities and provide resources to educate individuals, families, and communities about the SNAP process, benefits, eligibility, and self-service tools.
- c. Effective education and service strategies must be developed by Grantee and implemented to support these efforts and must include the following:
  - i. One-on-one or classroom training in multiple languages (including English and Spanish) to assist individuals in successfully navigating the online application, renewal, and benefits determination processes. The focus must be to increase individuals' ability to effectively use HHSC's self-service tools, resources, and the election of electronic notifications.
  - ii. Written guidance in multiple languages (including English and Spanish) that individuals can use to follow along as they submit

applications. The guidance must include a comprehensive list of all documents that support the types of languages and any other information necessary to submit a complete online benefits application; and

- iii. On-site or mobile assistance to help individuals register online and establish new accounts or locate existing accounts.

## **2. SNAP Outreach and Targeted Outreach.**

- a. Grantee and its Subrecipients must develop, implement, and conduct SNAP Outreach and Application Services activities targeting potentially eligible individuals and community networks across Texas. These efforts must be tailored to address the specific needs of underserved areas, utilizing innovative strategies to connect with hard-to-reach populations. Outreach methods must be presented in the proposal and align with mandatory components and flexibility in the outreach plan design. Grantee must conduct targeted in-person and virtual outreach activities in designated Texas regions based on demographic and poverty data. Innovative strategies must be employed to connect with potentially eligible individuals in underserved areas, utilizing gap maps, census data, and other research to define outreach methods.

## **3. SNAP Enrollment Targets.**

- a. Grantee and their Subrecipients must conduct activities to increase SNAP enrollment in the counties within the Regions served. Grantee and their Subrecipients must establish measurable goals and track to reflect quarterly increases in SNAP enrollment services and track progress towards achieving the annual goals throughout the Contract period. If performance does not meet the established targets, adjustments to planned outreach activities and education must be made to ensure that the targets are met. This process involves ongoing monitoring and adaptation to effectively achieve the desired outcomes outlined by HHSC.

## **4. Electronic Submissions through YourTexasBenefits.com.**

- a. Grantee and its Subrecipients must assist clients in submitting complete SNAP applications online via YourTexasBenefits.com or the Your Texas Benefits mobile app and must ensure at least eighty (80) percent of applications are filed electronically with sixty (60) percent being process ready. This approach emphasizes accuracy and efficiency and reduced wait times. When an online submission is impractical, Subrecipients must also support paper submissions through fax or local HHSC Eligibility Offices, with corrective actions planned for those not meeting these standards.
- b. Grantee must establish processes to help individuals complete and sign paper applications sent to HHSC via fax or delivered to a local HHS

Eligibility Office (see Exhibit P, HHSC List of Eligibility Offices). These processes must emphasize accuracy and expediency.

**6. Understanding of Texas SNAP Population and Targeted SNAP Outreach.**

- a. Grantee and their Subrecipients must have sufficient knowledge and expertise of the unique needs and challenges of the Texas SNAP population to carry out the requirements of the Contract. This understanding must inform the development and implementation of tailored outreach and assistance strategies, ensuring relevance and effectiveness in addressing the needs of diverse communities..
- b. SNAP Outreach efforts must be focused on the following priority target populations:
  - i. Texas urban areas with a low SNAP participation rate;
  - ii. College students;
  - iii. Black and Hispanic Texans;
  - iv. Texan children; and
  - v. Texas senior citizens.

**7. Documentation Assistance.**

Grantee and its Subrecipients must assist Clients with documentation collection to expedite eligibility decisions, utilizing the designated Texas SNAP application system for all documentation transmission. Procedures must be established to ensure accuracy and efficiency in the documentation process, with a focus on maintaining client confidentiality and data security.

**8. Phone Assistance Integration.**

Grantee must coordinate in-person assistance with phone assistance services to ensure seamless support for applicants. Telephonic signatures must be implemented for documentation and application processes to facilitate remote assistance for clients, enhancing accessibility and convenience.

**9. Infrastructure and Resources.**

- a. Grantee must have the following:
  - i. Physical Space: Adequate facilities to conduct meetings with individuals and families.
  - ii. Computer Equipment: Access to computers with internet connectivity to facilitate online assistance through YourTexasBenefits.com.
  - iii. Virtual Assistance Resources: Procedures and resources to offer virtual application assistance that align with federal and state security and privacy requirements.

- iv. Mobile Services: Resources to provide mobile services beyond Grantee's physical location, catering to hard-to-reach populations and areas with limited internet connectivity.
- v. Interpreter Services: Access to interpreter services to ensure assistance is provided effectively to individuals and families for whom English is not their first language.

**10. Collaboration and Recommendations.**

Grantee must collaborate with State agencies and community partners to identify coordination efforts in food security and enhance collaboration for improved food security efforts. Recommendations on best practices must be provided to HHSC, based on collaborative efforts, with a focus on fostering partnerships and leveraging resources to maximize impact.

**11. Case Management Services.**

- a. Grantee must assist individuals currently receiving SNAP in managing their benefits through YourTexasBenefits.com and enhanced case management functions.
- b. This includes, but is not limited to:
  - i. Creating accounts;
  - ii. Assisting with renewals;
  - iii. Uploading documents that may provide support to the individuals' benefits cases;
  - iv. Upgrading accounts;
  - v. Resetting passwords; and
  - vi. Managing benefits cases using the "Search Status" in the Community Partner Portal located within YourTexasBenefits.com.

**D. Strategy 3: Community-Led Innovation "Empowerment Through Innovation"**

**1. Community-Led Innovation.**

- a. Grantee and its Subrecipients must develop, implement, and conduct a customized community-led outreach project for their service Region. Grantee and its Subrecipients must partner with local stakeholders, such as community leaders, other nonprofit organizations, and SNAP clients to identify outreach barriers and collaboratively develop tailored solutions. Grantee and its Subrecipients must address challenges faced by SNAP clients aiming to alleviate food insecurity and strengthen resilience for SNAP clients. Grantee and its Subrecipients must propose projects to HHSC that address specific challenges faced by SNAP clients in their service Region.

b. Examples of these potential projects include:

- i. Implementing mobile outreach units;
- ii. Developing educational programs;
- iii. Organizing outreach events; and
- iv. Hosting community workshops.

**2. Location of Services.**

Grantee and Subrecipients must provide the locations or venues where SNAP Outreach services will be provided, how the Grantee identified the locations/venues within their service area, and if the audience meets the general low-income standard in the Plan of Operations.

**3. Reporting Requirements, Budget, and Cost Considerations.**

Grantee and Subrecipients must report outreach activities, such as application submissions, number of applicants served, number of educational materials distributed, and enrollment outcomes, to inform Grantee's programmatic decisions and strategies to improve effectiveness in the Quarterly Performance and Expenditure Report. Grantee and Subrecipients must ensure that the activities align with their approved budget.

**4. Timeline, Deliverables, Evaluation, and Continuous Improvement.**

Grantee and Subrecipients must provide progress reports and final outcomes in accordance with instructions and template provided by HHSC in the Quarterly Performance Report. Grantee must use the project progress and outcomes to develop and implement an evaluation framework to assess the effectiveness of SNAP outreach initiatives and identify areas for continuous improvement.

**5. SNAP Enrollment Targets.**

Grantee and Subrecipients must establish specific targets and strategies for SNAP enrollment that focus on reaching underserved populations and increasing access to benefits. Grantee must ensure that the identified outreach activities are designed to achieve the intended outcomes by partnering with local stakeholders to reach underserved populations and increase their access to benefits.

**6. Inclusivity in Innovation Strategy.**

Grantee and Subrecipients must have knowledge of the demographics and characteristics of the Texas SNAP population and tailor outreach efforts to effectively reach and serve eligible individuals and families. Grantee must also ensure that outreach efforts and programmatic innovations are inclusive, equitable, address the needs of diverse populations, and reduce disparities that create barriers to access SNAP benefits.

**E. Other Program Requirements**

### 1. Community Partner Program (CPP)

- a. Grantee and Subrecipients must participate in HHSC's CPP as Level IV Community Partners. Formal Level IV Memorandums of Understanding ("MOUs") must be executed with the HHSC CPP indicating each Subrecipient will serve as an application assistance and case management site to help people use YourTexasBenefits.com to apply for, renew, and manage their benefits cases online.
- b. Qualifications for Level IV Community Partners include the ability to:
  - i. Provide SNAP application information and assistance;
  - ii. Provide limited case management services to clients assisted by the organizations in applying for benefits; and
  - iii. Participate in the monthly CPP calls and forums to remain abreast of program and policy information and updates.

### 2. Project Work Plan

- a. Grantee must complete and submit a Project Work Plan to HHSC for review within thirty (30) Calendar Days after the Contract Effective Date and annually thereafter ninety (90) Calendar Days prior to the end of each Fiscal Year (see **Exhibit L, Deliverables, D-07**). Failure to comply with this requirement may result in termination of the Contract. The Project Work Plan must be submitted via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)). The Project Work Plan must be finalized upon HHSC approval and implemented as approved.
- b. The Project Work Plan must:
  - i. Clearly define the overall goals of outreach activities with specific and measurable objectives to provide services that support the increase in the number of SNAP-eligible individuals and families receiving benefits.
  - ii. Provide a detailed timeline, including date, location, and time of outreach activities.
  - iii. Ensure that activities align with the proposed budget and indicate financial resources allocated to specific tasks.
  - iv. Outline the roles and responsibilities of the Grantee, Subrecipients, and volunteers.

### 3. Annual State Plan Documents

Grantee must complete and submit the Annual State Plan Documents (all requested programmatic forms and budget) and all required revisions for the submission of HHSC's Annual State Plan to FNS, annually, by the date established by HHSC (see **Exhibit L, Deliverables, D-08**). Failure to comply with this requirement may result in termination of the Contract. The Annual State Plan Documents must be submitted via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).



#### 4. Continuous Improvement Plan

- a. Grantee must have ongoing knowledge and awareness of the Texas SNAP population outreach needs to ensure continuous improvement. Grantee must submit a Continuous Improvement Plan to HHSC for review within thirty (30) Calendar Days of the Contract Effective Date and annually thereafter, sixty (60) Calendar Days prior to the end of each Fiscal Year (see **Exhibit L, Deliverables, D-09**). The Continuous Improvement Plan must be finalized upon HHSC approval and implemented as approved.
- b. The Continuous Improvement Plan must:
  - i. Establish specific, measurable, achievable, relevant, and time-bound objectives and goals that align with the identified needs of the Texas SNAP population.
  - ii. Describe how Grantee will collect, aggregate, and analyze qualitative and quantitative data on SNAP enrollment barriers in Texas.
  - iii. Describe how Grantee will collect feedback from stakeholders and participants on a quarterly basis and make necessary adjustments to the plan based on feedback and performance data.
  - iv. Outline how the Grantee will ensure active involvement of relevant stakeholders throughout the continuous improvement process, maintaining clear communication to gather input and keep stakeholders informed of enhancements and process changes.
  - v. Specify the methods the Grantee will use to maintain records of all improvement activities, processes, and outcomes, ensuring documentation is comprehensive and up to date.

#### 5. Cybersecurity Training and Acknowledgement of Completion.

- a. Grantee must complete a cybersecurity training in accordance with Section 2054.5192 of the Texas Government Code. Any Grantee with access to an HHSC computer system, database, secure file transfer protocol, HHSC learning portal, the State of Texas Automated Information Reporting System, etc., must complete a cybersecurity training program certified by the Department of Information Resources (DIR). Grantee must complete and submit HHSC's Form 3834, Written Acknowledgement of Completion of Cybersecurity Training Program (<https://www.hhs.texas.gov/regulations/forms/3000-3999/form-3834-written-acknowledgement-completion-cybersecurity-training-program>), thirty (30) Calendar Days after the Contract Effective Date, and at Contract renewal thereafter, or as requested by HHSC (see **Exhibit L, Deliverables, D-10**). Form 3834 must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)). All required training must be documented, and training records must be maintained on file and available for review by HHSC upon request.



- b. If Grantee hires an officer, employee, or Subrecipient subject to the requirements in this Section, that officer, employee, or Subrecipient must complete the applicable cybersecurity training program before being given access to an HHSC computer system or database.

**6. Transition Plan.**

- a. Grantee must develop and submit a comprehensive Transition Plan thirty (30) Calendar Days after the Contract Execution Date (see **Exhibit L, Deliverables, D-11**). Grantee must submit updates and changes to Transition Plan to HHSC for approval at least thirty (30) Calendar Days before a change becomes effective. Grantee must implement the Transition Plan as approved as required by HHSC. The Transition Plan must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- b. The Transition Plan must:
  - i. Include the identification, management, and mitigation of risks related to assuming the Grantee responsibilities under the Contract and from the outgoing Contract holder.
  - ii. Include a comprehensive and detailed step-by-step action for a successful transition of current operations from the outgoing Contract holder to Grantee, including the respective roles and responsibilities of the parties in the transition.
  - iii. Include Grantee's plan of action to ensure uninterrupted service to current Consumers, including a detailed schedule of continued business operations for all transition functions and requirements and an explanation of how Grantee will ensure service gaps do not exist for current SNAP application assistance and case management services.
  - iv. Describe how Grantee will coordinate and facilitate all transition activities with the outgoing contract holder as well as how Grantee will work with HHSC to schedule and complete all activities required to maintain service continuity notwithstanding the transition.

**7. Plan of Operation.**

- a. 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 (see **Exhibit L, Deliverables, D-12**). Grantee must implement the plan as approved. Ongoing updates and changes must be submitted to HHSC for approval at least thirty (30) Calendar Days before a change becomes effective.
- b. The Plan of Operation and any updates must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)). The Plan of Operation must describe the proposed services, processes, and methodologies

for meeting all components described in **RFA Article II. Scope of Grant Project**, including the approach to meeting the timeline and associated milestones. Grantee must identify all tasks to be performed, including all grant activities, to take place during the grant funding period.

- c. The Plan of Operation must also include the following:
  - i. Hours of operation and the location where the services are provided;
  - ii. Names, position titles, responsibilities, and contact information for administrative staff responsible for related activities to fulfill contractual obligations;
  - iii. List of staff and position responsibilities delivering services;
  - iv. Qualifications and competencies of each staff member paid from this Contract;
  - v. Comprehensive description of Grantee's policies and procedures for each of the services provided by this Contract.
  - vi. Comprehensive description and delivery method for services provided to Clients including implementation plans for the provision of application assistance, and the activities pursuant to Strategy 3 (Community-Lead Innovation).
  - vii. Compliance and performance plans for Grantee's network that outline how Grantee will meet Contract performance goals across its network.

## **8. Quality Management Plan.**

- a. Grantee must develop, implement, and maintain a current Quality Management Plan that encompasses an overall approach for a comprehensive, continuous, and measurable quality management program. Grantee must submit a Quality Management Plan forty-five (45) Calendar Days after the Contract Effective Date, and annually after, thirty (30) Calendar Days prior to end of each Fiscal Year (see **Exhibit L, Deliverables, D-13**).
- b. The Quality Management Plan must include the following components:
  - i. Strategies and processes to promote and deliver quality services;
  - ii. Procedures to quarterly measure and report performance to HHSC;
  - iii. Grantee's process for providing HHSC copies of all internal quality assurance audit reports when developed or received by Grantee;
  - iv. Mechanisms for addressing non-conformance and implementing corrective actions.

## **9. Security Incident Response Plan**

- a. Grantee must develop and implement a Security Incident Response Plan that

actively coordinates the response to security incidents. A security incident is any event that actually or potentially jeopardizes the confidentiality, integrity, or availability of Grantee's information system and/or HHSC Confidential Information.

- b. Grantee must submit the Security Incident Response Plan within twenty (20) Calendar Days of the Contract Effective Date (see **Exhibit L, Deliverables, D-14**). Grantee must also submit ongoing plan updates and changes for HHSC approval at least thirty (30) Calendar Days before any change takes effect. The Security and Incident Response Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- c. The Security Incident Response Plan will detail Grantee's comprehensive response strategy to a security breach or suspicion of unauthorized access, including procedures for preparation, detection and analysis, containment, eradication, and recovery, which includes but is not limited to the following:
  - i. A roadmap for implementing Grantee incident response procedures;
  - ii. The structure and organization of the incident response procedure;
  - iii. A high-level approach for how the incident response procedures integrate with the broader framework of Grantee;
  - iv. An alignment of the procedures with Grantee's unique needs, considering its mission, size, structure, and functions;
  - v. Definitions of reportable incidents, which include, but are not limited to, the following examples:
    - a. Unauthorized access to or disclosure of Confidential Information;
    - b. Data Breaches;
    - c. Loss or theft of devices containing sensitive data; and
    - d. Malicious cyber activity, such as hacking, phishing, or ransomware attacks.
  - vi. Metrics for measuring the effectiveness of the incident response within Grantee;
  - vii. The resources and management support needed to effectively maintain and continuously improve Grantee's incident response procedures;
  - viii. The approval process for the plan by designated officials within the Grantee;
  - ix. The process for periodic reviews of the incident response plan, especially as significant changes occur in the environment; and
  - x. Updates to address system organizational changes or problems

encountered during plan implementation, execution, and/or testing.

## **10. Disaster Recovery and Business Continuity Plan**

- a. Grantee must ensure uninterrupted service delivery to Clients. Grantee must develop and maintain a written Disaster Recovery and Business Continuity Plan.
- b. Grantee must submit the Disaster Recovery and Business Continuity Plan to HHSC within forty-five (45) Calendar Days following the Contract Effective Date (see **Exhibit L, Deliverables, D-15**). Grantee must also submit any updates and changes to the Plan for HHSC approval at least thirty (30) Calendar days before any change takes effect. The Disaster Recovery and Business Continuity Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- c. This Disaster Recovery and Business Continuity Plan will comprehensively outline Grantee's approach to disasters that could impact the provision Services under this Contract, or its ability to meet associated Contract requirements, which must include the following:
  - i. 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.
  - ii. 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.
  - iii. 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 site's location and its proximity to the central site.
  - iv. Specifications for backup and recovery procedures, including timeframes for restoring full and partial services.
  - v. 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.
  - vi. Descriptions of documentation and tracking instruments that enable HHSC to verify if performance measures are met during a disaster recovery phase.
  - vii. The process for informing HHSC contacts of the initiated disaster recovery and contingency operations.
  - viii. 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, Grantee must revise its plan to rectify any gaps or deficiencies identified during the drill.

- ix. A continuity of operations business plan based on a risk assessment that identifies natural and human-caused disasters in the Region that must address:
  - 1. Critical emergency management to determine direction and control of the emergency response effort(s).
  - 2. Warning and communication;
  - 3. Emergency financial needs and resource management;
  - 4. Safety of Clients, staff, and attendants;
  - 5. Continuity or alternative arrangements for essential service functions and the essential service needs of consumer services; critical personnel; and
  - 6. The resumption of operations as swiftly as possible.

## 11. Key Personnel and Organizational Plan

- a. Grantee must ensure that its personnel possess the specific qualifications necessary to perform the functions associated with each of the core services. Additionally, Grantee must maintain adequate staffing levels, allocate a percentage of key staff time to this Contract approved by HHSC, and adjust its qualified staff to meet the requirements of the Contract, applicable state and federal regulations, and evolving HHSC and Client needs. Grantee must ensure appropriate staff are available to meet with HHSC and that HSC access to appropriate staff is not restricted.
- b. Grantee must submit a Key Personnel and Organizational Plan seventy-five (75) Calendar Days after the Contract Effective Date (see **Exhibit L, Deliverables, D-16**). Grantee must report any staff changes, reorganizations, or reassignments (temporary or permanent) for any key personnel specified in this section in written form within ten (10) Calendar days other than changes due to resignation, death, or military recall. This notification will include a plan to recruit key personnel. Ongoing personnel or organizational changes must be submitted to HHSC for approval at least ten (10) Calendar days before a change becomes effective. HHSC will determine if a budget revision will be required to align with the personnel changes. The Key Personnel and Organizational Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- c. The Key Personnel and Organizational Plan must include:
  - i. A summary of Grantee and each Subrecipient's organizational

- capacity;
- ii. Details on Grantee and Subrecipients' personnel retention and turnover;
- iii. Strategies, success, and experience in recruiting, hiring, and retaining personnel;
- iv. An organizational chart of Grantee and each Subrecipient which includes the names and positions and identifies all key personnel that will be assigned to the project (include proposed vacant positions); and
- v. A Staff Activity and Allocation list that includes all key personnel of Grantee:
  - A. Personnel names;
  - B. Personnel positions;
  - C. Personnel responsibilities and tasks that staff will work on each proposed project or strategy; and
  - D. The percentage of time each personnel is allocated to the projects and strategies. Grantee may allocate personnel up to one hundred percent (100%) of their time to the project. Personnel allocated at one hundred percent (100%) may not manage, oversee, or participate in other projects, contracts, etc.

## 12. Staff Development Plan

- a. Personnel must meet specific qualifications for the various SNAP application assistance functions and Grantee must commit to ongoing training to develop and enhance staff capacity. Grantee must maintain and implement a written Staff Development Plan for developing and enhancing the performance of staff responsible for providing services (including Subrecipient personnel).
- b. Grantee must submit a Staff Development Plan to HHSC ninety (90) Calendar Days after the Contract Effective Date (see **Exhibit L, Deliverables, D-17**). Grantee must submit updates and changes to the Staff Development Plan for HHSC approval at least thirty (30) Calendar Days before a change becomes effective. The Staff Development Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- c. Grantee's written Staff Development Plan must include the following:
  - i. The total minimum number of training hours required for each personnel to meet minimum competency requirements;

- ii. A schedule for training, including the number of hours for each training;
  - iii. The training curriculum, including specific topics;
  - iv. Training objectives;
  - v. The training method;
  - vi. Names of the instructors; and
  - vii. A plan to monitor and address personnel performance.
- d. Grantee must provide the following trainings to all personnel prior to the staff member providing services:
  - i. Orientation to community resources;
  - ii. Grantee's policies and procedures;
  - iii. 29 United States Code Section 794 (relating to Nondiscrimination under federal grants and programs);
  - iv. Confidentiality of records;
  - v. Techniques of working with persons seeking assistance.
- e. When applicable, Grantee must document the reason for any failure to provide the required training to personnel within the specified time frame. Additionally, Grantee must ensure staff receive ongoing training to address any identified deficiencies or when additional training is necessary.

### **13. Complaint Resolution Plan**

- a. 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.
- b. Grantee must submit copies of the complaint reports to HHSC within three (3) Calendar Days of the initial request. Upon resolution of the complaint, Grantee must notify HHSC promptly and provide an overview of the outcome.
- c. Grantee must submit a Complaint Resolution Plan to HHSC twenty (20) Calendar Days after the Contract Effective Date,(see **Exhibit L, Deliverables, D-18**). 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. The Complaint and Resolution Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- d. In addition to the Complaint Resolution Plan, Grantee must maintain documentation for all complaints received, along with Complaint Log which



includes the following information for each complaint received:

- i. Date of complaint;
- ii. Name of complainant;
- iii. Name of the Client, if different than complainant;
- iv. Contact information for complainant or Client receiving services;
- v. Details about the complaint;
- vi. Complaint resolution or planned resolution;
- vii. Name of staff involved in resolution; and
- viii. Date resolution was completed.

#### **14. Turnover Plan and Turnover Activities**

- a. Grantee must submit a Turnover Plan ninety (90) Calendar Days after the Contract Effective Date, and annually thereafter, sixty (60) Calendar Days prior to the end of each Fiscal Year (see **Exhibit L, Deliverables, D-19**). Turnover is defined as those activities that are required of Grantee to transition Contract operations to a successor or to HHSC.
- b. Grantee must submit any Turnover Plan updates to HHSC for approval at least thirty (30) Calendar Days before a change becomes effective. The Turnover Plan must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- c. At a minimum, the Turnover Plan must include the following:
  - i. Grantee's plan for the turnover;
  - ii. Defined turnover activities (including tasks and subtasks) for the turnover, including staffing and resource requirements;
  - iii. Turnover schedule;
  - iv. Current documentation of outstanding issues;
  - v. Statement of resource requirements that must be met by a successor or HHSC to take over the program, including Grantee charts and resource requirements necessary to perform the program's operations;
  - vi. Knowledge transfer to successor or HHSC; and
  - vii. Any other information needed for an orderly transfer of services.
- d. The HHSC-approved Turnover Plan must delineate the turnover activities the Grantee will conduct to transition Contract operations to a successor service provider or HHSC during the Contract term and up to the conclusion of the Contract's turnover activities. Grantee is required to cooperate with HHSC and



the successor service provider to provide necessary information and share experience gained during the Contract term to facilitate a smooth transition. All turnover-related obligations must be completed before Contract expiration.

- e. Turnover Activities must at a minimum include the following:
  - i. 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. 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;
  - ii. Transfer of all training schedules and materials in electronic format including but not limited to development methodology, curriculum materials, training class statistics, outcomes and documentation, materials in development, best practice materials, all other training and curriculum development documentation and data related to the required training of Grantee staff;
  - iii. Comprehensive and complete knowledge transfer to HHSC or to another entity of all practices and procedures utilized in performing all Contract requirements;
  - iv. The implementation of a quality assurance process to monitor turnover activities; and
  - v. Training HHSC and/or successor in the operation of business processes and any supporting processes related to the Contract.
- f. Turnover Plan Implementation:
  - i. Upon notification by HHSC that turnover activities are required, the Grantee must initiate and complete one hundred (100) percent of the turnover activities and activities identified to ensure a smooth transition of services.
  - ii. Grantee must provide status updates through completion of all required turnover activities to obtain HHSC approval or necessary guidance to ensure turnover activities are completed and approved prior to Grantee's submission for final payment.

#### **IV. PERFORMANCE AND COMPLIANCE**

##### **A. Required Reports**

Grantee must submit monthly, quarterly, and annual reports in accordance with the instructions on the templates provided and by the dates established by HHSC.

## 1. Monthly Performance Reports

- a. Grantee must submit a Monthly Performance Report in a form provided by HHSC by the tenth (10<sup>th</sup>) Calendar Day of each month, following the month being reported (see **Exhibit L, Deliverables, D-20**). The Monthly Performance Report must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- b. Grantee must provide the following in the Monthly Performance Report:
  - i. Detailed description of activities and services conducted during the reporting period to meet all KPRs and specified performance measures listed in the Contract requirements, including providing comprehensive application assistance and education to SNAP-eligible individuals and families, implementing/sustaining the community innovation strategy, and implementing targeted messaging and/or telephonic signatures;
  - ii. Summaries of the quality management activities conducted;
  - iii. Detailed status of all KPRs, and specified performance measures;
  - iv. Status of any identified risks, subsequent mitigation strategies, activities, and contingency plans for KPRs that are not being met;
  - v. Description of any issues or challenges encountered and how they were resolved, including the length of time from discovery to resolution; and
  - vi. Status updates of any corrective actions requested by HHSC.

## 2. Quarterly Performance and Expenditure Report

- a. Grantee must submit a Quarterly Performance and Expenditure Report in a form provided by HHSC by the fifteenth (15<sup>th</sup>) Calendar Day of the month, following the quarter being reported (see **Exhibit L, Deliverables, D-21**). The Quarterly Performance and Expenditure Report must include KPR validation and compliance measures, and quarterly expenditures. The Quarterly Performance and Expenditure Report must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).
- b. Grantee must provide the following in Quarterly Performance and Expenditure Report:
  - i. Detailed descriptions of the activities and services conducted during the reporting period to meet Contract requirements;
  - ii. Summaries of the quality management activities conducted;
  - iii. Detailed summary of all KPRs and specified performance measures;
  - iv. Status of any identified risks, as well as subsequent mitigation strategies, activities, and contingency plans;
  - v. Description of any issues or challenges encountered and how they

were resolved;

- vi. Status updates of any corrective actions requested by HHSC; and
- vii. Grantee must reconcile and include a quarterly expenditure summary in accordance with the instructions provided by HHSC.

- 3. Annual Performance Report.** Grantee must submit an Annual Performance Report in a form provided by HHSC by the twentieth (20<sup>th</sup>) Calendar Day, following the last day of the Fiscal Year being reported (see **Exhibit L, Deliverables, D-22**). The Annual Performance Report must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)). The Annual Performance Report must summarize the year's activities for each of the contracted components, provide verified annual data, present best practices identified during the year, and highlight successes and challenges.

## V. BUDGET AND INVOICING

### A. Annual Categorical Budget

1. Grantee must submit an Expenditure Proposal (Annual Categorical Budget) thirty (30) Calendar Days after the Contract Effective Date as applicable, and annually thereafter, sixty (60) Calendar Days prior to the end of each Fiscal Year or by the date specified by HHSC, as required in **Exhibit L, Deliverables, D-23**. The Annual Categorical Budget must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)). Grantee must complete and submit the Annual Categorical Budget using the template provided and by the date specified by HHSC, upon issuance of the Notice of Funds Available ("NFA") and budget submission deadline.
2. Grantee must use the following cost categories details and descriptions identified below:
  - a. **Personnel (Salary and Benefits):** Compensation for personnel services includes all remuneration, paid currently, or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. This guidance is in accordance with the CFR Title 2, Subtitle A, Chapter 2, Part 200, Subpart E § 200.430. Grantee must include: (i) name of staff member occupying the position; (ii) total monthly salary, number of months, and annual salary; (iii) percentage of time budget for this program and other projects; (iv) total months of salary budgeted; and (v) a justification for each position that clearly describe the responsibility and relationship to the accomplishment of the program objectives identified in the Contract. Also, benefits cost are in the form of employer contributions and are applicable to direct salary and wages. Grantee must provide information on the rate of fringe benefits used and the basis for their calculations.

- b. Copying and Printing Materials: Grantee must identify any printing, copying, and the purchase of materials. Grantee must identify the item description, number of items to be purchased, unit rates, and other funds used to support the copying, printing, and materials cost. HHSC and FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use, or authorize others to use videos, computer programs such CD-ROMs and related source codes, literature, or other products produced, in whole or in part, with SNAP funds for government purposes (7 CFR 277.13(g)). The nondiscrimination statement found in the (SNAP Outreach Guidance, 2017, pg.36) must be included on any printed publications or material and nonprint materials (including, but not limited to audio, video, websites, etc.) that explain USDA programs or program policy. Materials developed or reprinted with SNAP funds must include the nondiscrimination statement and be in accordance with (7 CFR 272.5(b)(2)).
- c. Internet and Telephone: Grantee must clearly identify cost associated with internet and telephone cost.
- d. Equipment and Other Capital Expenditures: Grantee must identify any Equipment and other capital expenditure purchases for the implementation of this program. Grantee must identify the item description, number of items to be purchased, unit rates, and other funds used to support the Equipment and other capital expenditures. The cost associated with maintenance or rental fees for equipment must be shown in the Other cost category. The purchase of all equipment will require three (3) bids and prior approval from HHSC and FNS. This requirement is in accordance with the CFR Title 2, Subtitle A, Chapter 2, Part 200, Subpart E § 200.439.
- e. Supplies and Non-Capital Expenditures: Grantee must include controlled assets, items such as laptops, tablets, printers, etc., with a useful life of one year and valued at \$500 or more in the budget. These types of purchases are considered supplies and must be listed in the Supply cost category. If Grantee is purchasing from a DIR vendor, only one (1) bid will be required. Supplies also include general office supplies and Programmatic Supplies. General office supplies and programmatic office supplies must be listed on separate line items and include a detailed description of proposed supplies and an estimated cost breakout to show how the agency arrived at the total budgeted cost.
- f. Building Space: Grantee may incur expenses related to four (4) possible types of building space: (i) space in a publicly (government) owned building; (ii) space in a publicly (government) rented building space; (iii) space in a privately owned building; or (iv) space in a privately rented building. The costs of space owned by HHSC (publicly owned) may only be recovered with a depreciation schedule, plus applicable charges for utilities, maintenance, and general upkeep. Cost for space owned by a

public entity must not be reimbursed based on private market rental rates, regardless of whether it is direct billed or donated. (2 CFR 200.436 and FNS Policy Memorandum-March 9, 1998). SNAP outreach share of the costs must be calculated using the percentage of square footage used for outreach. Use allowance is not allowable under 2 CFR 200. Grantee must provide the total square feet occupied, total staff and multiply the number of staff by the square feet occupied to the building. Grantee must provide a budget narrative documenting the building space calculation(s). If Grantee owns the space it occupies, it incurs building-related costs and claims SNAP reimbursement for the portion allocable to SNAP Outreach. Examples of such cost items include depreciation, maintenance, security, taxes, insurance, utilities, etc. Such costs are generally parallel to those incurred by HHSC for space it owns and occupies.

- g. Travel (Long Distance and Local): Provide a budget narrative that justifies each cost and explains how the amount for each local or long-distance travel was determined. Charges for travel must be for the purpose of fulfilling the approved outreach plan objectives based on official State, local or university travel regulations. Conference fees and related travel expenses must be justified and reasonable. The conference attendance must have a direct link to the activities in the plan and the provision of quality SNAP Outreach.
  - i. For Example: Local travel is calculated at 6 round trips from Capital City to Newtown to train outreach workers. Each trip is 120 miles round trip. ( $6 \times 120 = 720$  total miles). The total cost for local travel is  $720 \times \$0.565 = \$406.80$ . The mileage rate is established by the Internal Revenue Service annually.
- h. Contractual: The contractual cost details must include justifications and detail cost breakdown for (Salaries, Fringe Benefits, Copying/Printing/, Internet/Telephone, Equipment and Other Capital Expenditures, Supplies and Non-Capital Expenditures, Other, and Indirect Cost).
- i. Other: This category contains items not included in the previous budget cost categories. Individually list each item requested and provide appropriate justification related to the program objectives.

## **B. Quarterly Financial Status Reports and Reconciliation**

1. Grantee must complete and submit a Quarterly Financial Status Report ("FSR") and Reconciliation to certify that all invoices for the months in the quarter being reported and reconciled have been submitted for reimbursement to HHSC, by the fifteen (15<sup>th</sup>) day, following the quarter being reported and reconciled (see **Exhibit L, Deliverables, D-24**). The Quarterly Financial Status Reports and Reconciliation must be submitted to HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).

### **C. Budget Revisions**

1. Grantee must report deviations from budget or project scope or objective and request prior approvals from HHSC for budget and program plan revisions, to include budget revisions for subrecipients, in accordance with Code of Federal Regulations Title 2, Subtitle A, Chapter 2 Part 200, Subpart D 200.208 and Title 7, Subtitle B, Chapter 2 Part 272, Subchapter C 272.2(f).
2. Grantee must request prior approvals from HHSC for the following program or budget-related reasons:
  - a. Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval);
  - b. Change in a key person specified in the application or the Federal award;
  - c. The disengagement from the project for more than three months, or a twenty-five (25) percent reduction in time devoted to the project;
  - d. The transfer of funds budgeted for participant support costs to other categories of expense;
  - e. The sub awarding, transferring or contracting out of any work under a federal award, including fixed amount subawards;
  - f. Changes in the approved cost-sharing or matching requirements;
  - g. The revision indicates the need for additional Federal funding;
  - h. The revision cannot exceed five (5) percent of Grantee's cumulative total program budget without written prior approval from HHSC and the Federal awarding agency for each Fiscal Year.
  - i. The revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct cost; and
  - j. 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.
3. No other changes to Grantee's budget require approval from the Federal awarding agency. Examples of changes which do not require Federal approval are:
  - a. The use of State agency funds to accomplish program objectives over and above the State agency minimum share included in the approved Program budget; and
  - b. The transfer of amounts budgeted for direct costs to absorb authorized increases in indirect costs.

### **D. Invoicing (Request for Reimbursement)**

1. Grantee must submit monthly requests for reimbursement to HHSC. 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 (see **Exhibit L, Deliverables, D-25**). For months with less than thirty (30) Calendar Days, the invoice must be submitted the last day of the month. Grantee must use the request for reimbursement template provided by HHSC. The monthly requests for reimbursement must be submitted to AES Invoice Mailbox ([aes.invoices@hhsc.state.tx.us](mailto:aes.invoices@hhsc.state.tx.us)) and carbon copy HHSC via the SAR/VAR Mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).

2. Grantee may not include expenditures for months other than the month for which reimbursement is being requested.
3. Grantee may submit a supplemental invoice in accordance with the instructions and template provided by HHSC.
4. Invoices not submitted in accordance with the instructions provided or do not follow the nomenclature will be denied and returned to the Grantee for necessary corrections to process the invoice for payment.
5. The following naming convention must be used for the subject line of the email: “Legal Entity Name. Invoice #. Month Year.” *For example*, an invoice submitted by HHSC for the month of September would look like this: “**Health and Human Services Commission. Invoice 1234. September 2025.**” The invoice must include the following:
  - a. A unique identification (Invoice) number.
  - b. The word “invoice.”
  - c. Date of the invoice.
  - d. Grantee’s name, address, and contact information.
  - e. The service dates for when the services were rendered.
  - f. A description of services provided.
  - g. The amount requested.
  - h. Mail Code.
  - i. Taxpayers Identification Number (TIN).
  - j. The Purchase Order Number; and
  - k. The total amount owed, if applicable.
6. 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.
7. 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. HHSC requires supporting documentation to substantiate each element of an expenditure, including expenditures claimed for match. Grantee must maintain adequate records and provide the necessary documentation to show clear proof (to HHSC's satisfaction) of an allowable expenditure. Upon HHSC's request, 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. HHSC has the right to request all documentation from Grantee it deems necessary to make an informed decision prior to payment. Grantee must certify that payments requested are in accordance with applicable Contract provisions, laws, and regulations and that the Contract requirements have been met. Supporting documents for reimbursement may include but are not limited to:

- a. **General Ledger.** The General Ledger ("GL") is the central repository for transactions from Grantee's financial applications - Accounts Payable, Payroll and other local interfaces. The GL must include only the funding sources and expenditures for the program. The GL must include current and cumulative charges by major cost categories direct labor, overhead, travel, equipment, other direct costs, and indirect costs associated with the project.
- b. Itemized invoices and receipts for operational expenditures and controlled asset and Equipment costs.
  - i. Receipts include but are not limited to receipts for operational and equipment costs, receipts for Outreach Items approved by HHSC, and Travel receipts used to reimburse staff for mileage, lodging, airfare, parking, and other receipts. All receipts must have itemized descriptions and costs.
  - ii. Payroll documentation must have staff time and funding sources to validate expenditures.
  - iii. Subrecipient/subrecipient reimbursement invoices to support expenditures.
- c. **Supplemental Invoices.** Cost-reimbursement types of Contracts provide for payment of allowable costs incurred to the extent prescribed in the Contract. HHSC will make payment on a cost reimbursement basis. Those recorded direct and indirect cost that, at the time of the request for reimbursement, the Grantee, has paid by cash, check, or other form of actual payment for items or services purchased directly for the Contract must be requested by the Grantee for reimbursement.
- d. **Submission Interval.**



- i. Grantee must submit an invoice monthly by the thirtieth (30th) Calendar Day of the month following the month in which expenses were incurred or services provided. HHSC will not process invoices that include multiple service months. Grantee must use the nomenclature in the example below. **Example.** Expenses were incurred or services provided for November, then HHSC must receive the invoice from the grantee by December 30th to receive reimbursement. The nomenclature for invoices must include the invoice number and the month of service (abbreviated) (e.g., R123456 Nov.)
- ii. If 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 (30th) Calendar Day of month. Grantee must use the nomenclature in the example. **Example.** 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. The nomenclature for supplemental invoices must include the original invoice number, month of service (abbreviated), and the abbreviation of the word supplemental (e.g., R123456 Nov. Sup.)
- iii. Grantee must provide assurances that Grantee's cost of activities are not funded from another federal source. In addition, HHSC does not provide start-up funding or issue advance payments. Grantee must submit an invoice no more than once a month using the official correspondence procedure by emailing to: AES.Invoices@hhsc.state.tx.us and copy the SNAP SAR/VAR mailbox (snap\_aa\_sar\_var@hhsc.state.tx.us).
- e. **Quarterly Expenditure Calls and Technical Assistance.** Grantee must participate in quarterly expenditure and technical assistance calls to discuss monthly invoicing, quarterly expenditures, and technical assistance needs.
- f. **Private Cash Donations.** Grantee must track all private cash donations used for the project. Private cash donations typically come from a single individual, a family, or a corporation, which receives a tax deduction for donations. Private cash donations are not reimbursable unless an approved waiver from FNS is granted.
- g. **In-Kind Donations from Public Agencies.** The donations of goods and services by a public entity to the State agency result in a de facto State agency expenditure or outlay and are thus considered reimbursable. The donation of goods and services by a private entity are not reimbursable. Grantee must track all in-kind donations from public agencies received and used for the project.

- h. **In-Kind Donations from a Private Entity.** An in-kind donation by a private entity is not considered a state agency expenditure, therefore, is not considered a cost and is not reimbursable. Grantee must track all in-kind donations from private agencies received and used for the project.
- i. **Cash Contributed or Donated by Other Non-Federal Public Agencies.**
  - i. The donations or contributions cost must not be claimed by another Federal program or used to match another Federal program. Grantee must track cash donations received and used for the project.
  - ii. If Grantee contributes cash for actual, allowable, and allocable costs incurred monthly and supported by adequate documentation to finance operations, they must submit an invoice for the entire Project cost. Grantee may be reimbursed up to 50% of those costs for each strategy. The strategies are **Strategy 1, Formal Network, Strategy 2, Application Assistance, and Strategy 3, Community-Led Innovation.**
  - iii. Request for reimbursement for private cash may not exceed Grantee's proposed private cash Match amount in the expenditure proposal.
  - iv. The expenditures requested for reimbursements must be requested for the month in which the expenditures were incurred.
- j. **Program Income.** Program income (as defined in Title 2 Subtitle A Chapter 2 Part 200 Subpart D 200.307 is designed to defray program costs where appropriate. Program income is deducted from total allowable costs to determine the net allowable costs. Program income is used for current costs unless the HHSC and the Federal awarding agency authorize otherwise. Grantee must track and report Program income generated and used for the project.
- k. **Capital Equipment and Controlled Assets Requests (CE/CA).** Grantee must submit a written request to HHSC for prior approval to the purchase of Capital Equipment and Controlled Assets (CE/CA) included in the budget via the CE/CA Request process. CE/CA are defined as follows:
  - i. Capital Equipment - Individual items valued at \$10,000.00 or more.
  - ii. Controlled Assets - Individual items valued at \$500.00 to \$9,999.00.CE/CA Requests require three (3) 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 (1) bid, the Grantee must include a statement in the Vendor Action Request (VAR) stating that the Grantee is using a DIR vendor and includes only one (1) bid. The following are the thresholds for the CE/CA. Controlled asset items valued below \$500 do not

require HHSC approval but must be included in the budget and tracked in the Grantee's inventory. 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.

1. **Inventory Control Log.** Regardless of whether equipment is acquired in part or its entirety under the Federal award, Grantee or its Subrecipient, as applicable, must manage equipment (including replacement equipment). A physical inventory of the property must be conducted, and the results must be reconciled with the property records at least once every two years in accordance with Title 2 Subtitle A Chapter 2 Part 200 Subpart D 200.313. Grantee must submit an inventory control log in a form provided by HHSC which must include all CE/CA purchased with HHSC funds. The CE/CA and the inventory control log must be reconciled at the end of each Fiscal Year closeout. HHSC may request copy of the Grantee's inventory control log at any time during the grant period. The inventory control log is due by the date and time specified by HHSC.

## VI. NEED TO INFORM

1. Grantee must notify the designated HHSC contract manager within twenty-four (24) hours after the occurrence of any of the following conditions:
  - a. Problems, delays, or adverse conditions which materially the Grantee's ability to meet the Contract objectives or timelines. This disclosure must include a statement of:
    - i. Action taken to address the issues creating delays;
    - ii. Action taken to meet Contract requirements notwithstanding those issues; and
    - iii. Any assistance needed to resolve the situation.
  - b. Legal or financial difficulties (e.g., lawsuit, IRS involvement) that involve the Grantee or could affect the Program;
  - c. Change in location or physical location for Contract-related work; and
  - d. Any changes in Key Personnel.

## VII. EMERGENCY PLAN

1. Grantee must develop and maintain an Emergency Plan. An emergency is defined as an unforeseen circumstance or combination of circumstances involving a Client that necessitates immediate action by Grantee or results in a Client's urgent need for assistance or relief.
2. Grantee must submit an Emergency Plan to HHSC thirty (30) Calendar Days after the Contract Effective Date (see **Exhibit L, Deliverables, D-26**). Grantee must submit updates and changes to the Emergency Plan to HHSC for review and

approval at least thirty (30) Calendar Days before a change becomes effective. The Emergency Plan must be submitted to HHSC via the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us)).

3. Grantee must notify HHSC of any emergencies through the formal communication process within one (1) Calendar Day following the emergency. Notifications must be made to a live person at HHSC and leaving a voicemail message is not acceptable.
4. If an emergency occurs with a Client, Grantee must maintain the following documentation in the Client's case file:
  - a. Date and type of emergency;
  - b. Description of the emergency;
  - c. The outcome or resolution of the emergency;
  - d. Name of any persons notified of the emergency and their relation to the client;
  - e. Date HHSC was notified; and
  - f. Method of notice.
5. Grantee must maintain a log and the documentation outlined above for the Client file for three (3) years and have the emergency log available upon HHSC's request.

## VIII. DELIVERABLES

1. Grantee will provide measurable and verifiable Work Products to HHSC that are an objective and accurate reflection of contracted requirements and performance. This includes documents, processes, reports, plans, and other products to assist HHSC in:
  - a. The development and implementation of quality improvement processes;
  - b. Monitoring the status of operations;
  - c. Tracking progress towards objectives;
  - d. Evaluating and validating performance;
  - e. Ensuring adherence to policy; and
  - f. Ensuring timeliness, accuracy, availability, and access to services.
2. Grantee must submit all required Deliverables and reports in accordance with **Exhibit L, Deliverables** and the requirements in the **Exhibit D, SNAP Outreach Contract Requirements**. All reports and Deliverables must be submitted to the SAR/VAR mailbox ([snap\\_aa\\_sar\\_var@hhsc.state.tx.us](mailto:snap_aa_sar_var@hhsc.state.tx.us))
3. If a Deliverable due date falls on a Saturday, the Deliverable will be due on the Friday before the due date, and if the due date falls on a Sunday, the Deliverable will be due on the Monday following the due date. If a Deliverable is due on a state holiday, the Deliverable is due on the following Business Day.

4. All Deliverables submitted by Grantee must be accurate, complete, and supported by documentation. Failure to meet submission deadlines or respond to HHSC information requests may result in adverse action, including financial hold, without requiring a corrective action plan, as well as any other actions allowed under the Contract.
5. Grantee must maintain a copy of all Deliverables on file for reference, audit, and monitoring purposes.