

Food Insecurity Nutrition Incentive- 2014/2015 Questions and Answers- November 6, 2014.

Eligibility

Q: The RFA states that only one proposal can be submitted per project team. Can you define "team"?

A: A team would be the project director, an authorized representative on record that handles finances, and the co-project directors.

Q: Can more than one team apply from the same institution?

A: Yes. More than one team can apply from the same institution, so long as they are applying for different projects.

Q: If a grocery store chain has a Foundation, can they apply through their foundation?

A: If the Foundation meets the requirements of being a non-profit, and they are going to be performing the work, then they would be eligible.

Q: Are 501(c)(6) entities eligible?

A: Yes. All non-profit entities are eligible.

Q: Is a state registered non-profit farmers' market eligible for funding even if the 501(c)(3) is not yet set?

A: All non-profits can apply (doesn't have to be 501(c)(3)), as long as they have documentation that proves the organization is not-for-profit.

Q: We are a co-op, designated as "for-profit". Can we apply?

A: No. Eligibility to receive this grant is limited to government agencies and non-profit organizations.

Q: We host a farmers market in our Health Dept/DSS building. We have been considering an incentive program for our SNAP recipients. However, our market only runs May-October. Are we still eligible to apply for the grant?

A: Yes.

Q: Are land-grant universities eligible for this program?

A: If a part of the university is a non-profit organization, then that part of the university can apply as the lead organization. Otherwise, it would not qualify as a government agency or a non-profit organization and would not be eligible to apply.

Q: Is an entity in Puerto Rico eligible to apply and receive a USDA Food Insecurity Nutrition Incentive (FINI) grant?

A: An entity applying for a FINI grant in Puerto Rico would *not* be considered an “eligible entity” under Section 4405 of the Food, Conservation, and Energy Act of 2008, as amended by Section 4208 of the Agricultural Act of 2014.

Section 4405(a)(3) defines “supplemental nutrition assistance program” as the supplemental assistance program established under the Food and Nutrition Act of 2008. Section 4405(b)(2)(A)(ii)(II) requires that an eligible entity propose a project that “would increase the purchase of fruits and vegetables by low-income consumers participating in the supplemental nutrition assistance program by providing incentives at the point of purchase.”

Puerto Rico receives a block grant for its Nutrition Assistance Program and does not operate the Supplemental Nutrition Assistance Program. The Nutrition Assistance Program is subject to the terms of its plan of operation, as approved by the Secretary. Because the Puerto Rico Nutrition Assistance Program is a distinct and separate program from the Supplemental Nutrition Assistance Program, entities that apply to operate a FINI grant in Puerto Rico would not be considered an “eligible entity”.

Project Rules

Q: Will the FINI funds only cover new activities?

A: Yes. The grant funds will cover new projects and only the expansion activities of existing projects.

Q: Can funds be used to expand the capacity of farmer's markets, i.e. to support the expansion of more farmers vending at the market and through voucher incentives to consumers?

A: Funds must be used to directly support projects that increase the purchase of fruits and vegetables by low-income consumers participating in SNAP by providing incentives at the point of purchase. Funds can be used to expand the capacity of markets within the context of the grant project.

Q: The RFP states that no more than 50 percent of award budget expenditures may be sub-awarded. If a FSLP grantee is playing a role as an umbrella or intermediary organization, and providing small grants to many small organizations who actually implement the incentive programs, is that considered a sub-award requiring special indication in the proposal and NIFA approval if grants exceed 50% of the FINI award budget?

A: Yes. If your organization is acting as an intermediary and is simply passing the funds through, the organizations that are performing the work under your small grants would be considered sub-awards. Please note that applicant organizations must be involved in the project and must retain a portion of the funds for their efforts. You cannot pass-through all funds provided on the grant.

Q: If we apply for a two-year grant under FP or FLSP, can we apply for a second two-year grant in the next funding cycle?

A: Each team may only receive one FINI grant award per project. However, you may apply for a different project in the next funding cycle.

Q: Must the beneficiaries of the program ONLY be SNAP participants? If the project reaches a large portion of SNAP recipients, but also other low income (not currently SNAP using) individuals, would this still be appropriate?

A: No. Beneficiaries must only be SNAP participants.

Q: Can the independent evaluator be from a separate office within our institution that has expertise in program evaluation?

A: The grantee-led self-evaluation for FINI projects and FINI Large-Scale projects does not need to be independent, but certainly can be from a separate office within the institution of the grantee.

The independent evaluation for the entire FINI program (with which grantees will need to cooperate) will be solicited through a separate process. The independent evaluator cannot be from an institution that is submitting an application for or is a recipient of a FINI grant.

Q: Can funds be requested for a local evaluator?

A: Yes.

Q: Please explain what 7 C.F.R. 278.2(b) means on page 6 of the RFA.

A: 7 C.F.R. 278.2(b) is what we call the equal treatment provision of the regs. Basically it says that no retailer food store may single out SNAP clients for special treatment in any way. An incentive directed at SNAP clients would obviously treat SNAP clients differently. **Aside from treating SNAP clients differently by offering a SNAP-specific incentive**, this citation is intended to ensure that retailers don't have special check-out lanes for SNAP clients or charge different prices for products based on a customer's SNAP participation, etc.

Ultimately, FINI grantees with approved incentive proposals would automatically be granted a waiver of this regulation to cover provision of the SNAP incentive.

Q: We currently run an incentive program across a network of Farmers Markets and double ALL SNAP eligible purchases, not just produce. Will it be acceptable to continue the program as is and apply for FINI funds that will specifically go towards incentives for produce?

A: Incentive use may be limited to fruits and vegetable purchases, or could include for other SNAP eligible foods, as long as they are used to provide an incentive at the point of sale to purchase of fruits and vegetables. So, allowable projects might have as incentives:

- a payment that you get simply as a SNAP client showing up at an authorized retailer, but that can only be used for fruits and vegetables, OR
- a payment that can be used for anything, but that you only receive after buying fruits and vegetables.

USDA expects to consider both kinds of projects, and other innovative point-of-sale incentive approaches that encourage fruit and vegetable purchase and consumption, in the application process.

Program rules – Geography

Q: The RFP states lays out geographic ranges for projects including multi-county, state, and regional. Does regional refer to USDA regions? Must a regional project work in all states in a region? If not, must it work in contiguous states within a region?

A: No. A regional project does not have to work in all states within a region.

Q: Can more than one project be funded within the same region?

A: Yes.

Q: Is more than one application from a state allowed if they serve different groups (i.e. farmers markets & retail grocers)?

A: More than one project can be funded in a state if they are in different regions.

Match

Q: What are the parameters for allowable expenses for federal and matching funds?

A: Some of the more common costs associated with these types of projects are salaries/wages, materials and supplies, and travel costs. Office rent may be charged if pro-rated to the project and if the organization normally charges projects for their portion of the cost. Office rental may not be charged if the space is owned by the application organization or is included in their indirect cost pool. Meeting space rental is allowable if there is normally a charge for using the space (if an organization usually has access to a meeting space at no cost, that meeting space rental would not be an allowable expense). All costs must be directly related to the project objectives.

Q: Can money paid for an extension educator's teaching time be considered for the match? This money paid would not come from federal funds.

A: If the extension educator's time is being spent on this project - conducting educational workshops, etc. (not just doing their normal university teaching duties), then yes, they may consider that part of their match. The university would have to provide a pledge agreement for the time and funds.

Q: Must the match be non-federal money only?

A: Yes. Match must be from non-federal funds.

Q: If FINI funds are being used to expand an existing program, are the existing funds being used to execute the program not eligible for match? Must all match money be new money?

A: Yes. All match money must be new money. If the existing funds were there to serve the needs of the already existing program, they are not eligible for match.

Q: Can AmeriCorps/VISTA staff/grant be used as part of match?

A: Yes. AmeriCorps/VISTA staff time can be used for match.

Q: Can salaries of non-profit employees working on a federal grant be used as matching?

A: You cannot use employees' salaries for matching if they are working on another federal grant. You can, however, split the person's time and use that part of the salary as match, so long as you are only applying an appropriate proportion of time that will be spent on the FINI grant project.

Q: If we have negotiated indirect rate, can we use foregone indirect on matching direct costs as additional match? For example: We are using staff time as match. Can we also use the foregone indirect on that salary as match?

A: Foregone indirect costs are not eligible for matching. You would only be entitled to amount that would be calculated on federal funds costs.

Q: Are "community benefit" dollars/funds from non-profit hospitals deemed to be matching funds?

A: Community benefit funds from non-profit hospitals can be used as matching if they are specifically used for the FINI grant project only.

Q: Is there any circumstance under which match from a grocery store or for-profit food cooperative can be considered? Clearly not for-profit staff salary covering time spent on the project, but how about equipment and technology purchases made by the for-profit specifically for the project? How about postage and printing paid for by the for-profit for program-specific mailings?

A: Yes. Technology and equipment and postage paid, etc. made by the for-profit specifically for the project would be eligible for match.

Q: If a non-profit consumer cooperative is involved, are the salaries of its employees eligible to be used as match?

A: Yes. Their salaries would be eligible for match for the proportion of time spent working on the FINI grant project only.

Q: Can a farmers' market manager's entire salary be used toward match, or just time spent on SNAP program?

A: Only time spent on the FINI grant project would be eligible for match.

Q: Could a student intern be used as match?

A: Yes. If the student intern is normally paid a stipend, you may calculate the time spent on the FINI grant project and use as match. If the student is an unpaid intern, their calculated labor rate should be consistent with that paid for similar work within the organization or within the labor market.

Q: Can existing EBT machines in use at a market, incentives, and promotional materials – necessary for incentive program operations – be counted as match?

A: No. Equipment and funds already in place for an existing program cannot be used as match. New equipment bought to expand the incentive program as part of the grant project would be eligible for match.

Q: Is there any way to include EBT fees, either as part of the FINI budget or as match?

A: If a prospective applicant they can come up with a credible way to track EBT fees *that result specifically from the FINI project*, it could be an allowable cost.

Timeline

Q: When will we be notified of whether or not our application was approved? When will funding/activities start?

A: Awards will be made in spring 2015.

Q: The RFA says this is for 2014 and 2015, does that mean calendar years or fiscal years 2014-2015 and 2015-2016?

A: Fiscal years 2014 and 2015 – Federal FY 2014 = October 1, 2013 through September 30, 2014. Federal FY 2015 = October 1, 2014 – September 30, 2015.

The funds for this program were authorized in FY 2014. The awards will be issued in FY 2015.

Q: When does the RFA distribute funds so we know when to cut off this request to avoid a gap or overlap?

A: It is anticipated that award using Fiscal 2014 and 2015 funds will be issued in May 2015. The next RFA funds will be distributed in 2016

Application – Technicalities

Q: Does having support of SNAP agency simply mean that retailers are accepting SNAP?

A: No. This means you are or work with an eligible SNAP retailer and can show a letter of support for the project from your state SNAP agency.

Q: What constitutes a letter of support from a state SNAP agency? Can a SNAP agency issue more than one letter (for different projects)?

A: State SNAP agencies can issue more than one letter. The letter is an acknowledgement that the applicant is or works with an authorized SNAP retailer and that the SNAP agency is willing to work with the grant applicant.

Q: The RFP states that 5-10% of project funds should be used for evaluation. Does this refer to 5-10% of federal funds or 5-10% of total funds, including match?

A: This means 5-10% of the requested federal funds for the project.

Q: Does a FSLP 4-year project have a minimum total request of \$500,000 or \$2 million?

A: Minimum \$500,000 combined over all four years.

Q: We are a small non-profit who hosts farmer's markets. We file annual 990 forms, but do not currently have audited financial statements from a CPA firm. Are these required as supporting documentation when we apply for the grant?

A: If you do not have audited financials from a CPA firm, we would request that you send us two years of financials documents such as profit and loss statements and balance sheets. They do not need to be certified by a CPA.

Q: Is there minimum number of retail outlets that NIFA would like to see from applicants?

A: No.

Q: The RFP states that matching support should be shown in the Budget and Match documents in specified budget categories. If we have a grant from a private foundation where use of funds were not specified (i.e., the grant budget was one line item: incentive project), how should we reflect this in Budget and Match documents?

A: If this is being considered as cash matching, you would show the funds in the "Other" line item as third party cash matching and include a budget justification providing details on how these funds would be used for project expenses.

Q: We are required to submit budgets by period. Does this mean a separate budget per period if we are applying for multiple years? Can a budget period be longer than 12 months?

A: The budget period is generally 12 months. It can be less than 12 months, but not more than 12 months. If you are requesting a project that spans more than 12 months, a budget for each 12-month period would be required as well as a cumulative budget.

Q: If the indirect rate will not be negotiated until after the grant is awarded, how do you allow for that in your budget submission?

A: The applicant must complete an analysis of what the indirect costs may be and then put the dollar amount on the indirect cost line. You would note on your budget narrative for federal funds "rate to be determined" for the indirect costs.

Q: What are the rules about typeface and spacing? Is there a preferred font style and size? Must the narrative, budget documents and logic models all be double spaced?

A: Please see page 18 of the RFA. Please make sure the reviewers can read the logic model and the budget documents. They do not need to be double spaced.

Application – Considerations

Q: Will non-rural communities be given equal consideration for approval?

A: Yes.

Q: The RFA states a desire for the projects to be innovative. Can a project try to replicate another state's program such as Double Up Food Bucks?

A: Yes, you may replicate another state's program. However, as the RFA states, priority will be given to projects that test innovative strategies that would: (1) contribute to our understanding of how best to increase the purchase of fruits and vegetables by SNAP participants and (2) would inform future efforts.

Q: What kind of technology development are you looking for? Does this mean the current EBT machine, or do you have to use something new?

A: You can use the current EBT machine, but applicants are encouraged to develop new technology that can be adopted nationally.

Q: Is it best for the applicant to be an authorized SNAP retailer or can it be vendors or sub-contractors?

A: Please see pages 13 and 14 of the RFA. Applicants must be a government agency or a non-profit agency.

Q: Will there be a separate RFA for the national evaluation process?

A: No. There will not be an RFA for a grant for the independent evaluator. This will be issued as a contract.

Q: Are sub-awardees allowed to be on more than one application?

A: It would be a matter of distributing the sub-awardee's time appropriately. There is no prohibition against this, but the time commitment of the sub-awardee would have to be thoroughly explained.

Q: How do we go about requesting an indirect cost rates if we do not have one now and want to apply for one this year?

A: On the NIFA website at http://www.nifa.usda.gov/business/applying_for_grant.html there is a link "indirect cost rate – process for establishment" which explains what you need to submit. This can be a long process and can take anywhere from three to six months.

Q: Can a lead applicant also be included on another application as a sub-awardee on a separate application for different activities?

A: Yes.

Q: What are the reporting requirements? How many reports will NIFA require and how often?

A: Project Reports: (1) Project initiation report prior to receiving the award funds. (2) Annual progress report within 90 days of anniversary of receiving award. (3) Final report at the end of the project.

Financial Reports: SF425 - Must submit annually within 90 days of anniversary date of the award in addition to a final SF425 at the end of the project.

Q: How much travel is estimated to be required for project directors for FINI grant meetings each year?

A: One project director meeting each year. The other meetings may be through webinars or through teleconferences.

Q: Who should we contact for more information?

A: For questions about administration, budget, matching, etc., contact:

Susan Bowman at sbowman@nifa.usda.gov (202.401.4324) or

Adiene Woodin at awoodin@nifa.usda.gov (202.401.4320)

For programmatic questions, contact:

Dr. Dionne Toombs at dtoombs@nifa.usda.gov

or

Dr. Jane Clary Loveless at jclary@nifa.usda.gov