

FINI Q&As

The following items are recommended for inclusion in the Questions and Answers (Q&As) that will accompany the Request for Applications (RFA) for the Food Insecurity Nutrition Incentive (FINI) grants.

Are FINI grantees who were awarded grants in the previous year eligible to apply again the following year?

Yes, FINI grantees who were awarded grants in the previous year may apply in the following year provided that their proposal expands upon the previous year's proposal by enlarging or otherwise modifying the geographic scope, the incentive mechanism, or other elements of the proposed incentive project. Grantees are not eligible to apply for a grant to simply continue funding a previous year's proposal.

Do partnering retailers/farmers markets have to be SNAP-authorized at the time that the grant application is submitted?

While it is not mandatory that a FINI grantee's proposed retailers be SNAP-authorized at the time of the grant application, it greatly speeds up the implementation process once the grants are awarded. Ultimately, all partner retailers must be SNAP-authorized in order to redeem incentive amounts as part of a FINI program grant project and FINI grantees must notify FNS of any change in the SNAP authorization status of their partner retailers.

What are the considerations around data sharing and client confidentiality?

- In general, SNAP client records are confidential.
- Under Section 11(e)(8)(A) of the Food and Nutrition Act (the Act), SNAP State agencies may disclose certain SNAP recipient information to persons directly connected with the administration or enforcement of FINI in order to conduct the mandatory project evaluations.
- FNS will provide guidance to grantees on which data elements are allowed and how to appropriately safeguard client data.
- Grantees will need to get FNS approval on data elements not included under the guidance issued by FNS.
- Data is to be shared with the independent evaluation contractor upon request.

How will grantees disclose participating retailers/farmers markets to FNS?

- All FINI grantees are required to submit to FNS a complete list of the SNAP authorized retailers, including farmers markets, partnering with and participating in the implementation of their grant project. This is separate from any reporting requirement for the evaluation component or under the FINI grant provisions. This information is being requested for SNAP integrity purposes. The list of retailers must be submitted with the initial proposal or within 30 days of grant approval. The list of retailers must include the store name, store address, and FNS number (if retailer is not yet SNAP authorized, instead indicate date of application for SNAP authorization).
- Retailers that are subsequently added to or removed from the list must be sent to FNS on a quarterly basis during the fiscal year, beginning 9-30-15. Any updates should make clear those retailers that have been added or removed as well as any changes in any partner

retailers' SNAP authorization statuses. Both the initial list as well as any quarterly updates should include the store name, store address, and FNS number (if retailer is not yet SNAP authorized, instead indicate date of application for SNAP authorization).

Can the incentive be awarded back onto the EBT card?

- At present, most State's EBT systems do not readily support the ability to award the FINI incentives directly back onto clients' EBT cards. Providing the incentive in this manner requires significant financial and technical resources and the full-support of the State and its EBT processor.
- All grantees planning to use EBT technology to provide their incentives will need prior approval from FNS and the relevant State SNAP Agency.

What is the status of online and mobile technology for SNAP benefit redemption?

- The use of mobile technology for benefit redemption is increasingly common among SNAP-authorized retailers. FNS has promoted mobile technology to increase the participation of farmers markets in SNAP.
- However, it is not currently possible to redeem SNAP benefits through an online website. FNS will be testing technology that would allow online payment through a series of pilot projects. However, as of October 2015, these pilots are not yet underway.

What foods are SNAP eligible and what foods are eligible for the incentive under FINI?

- The Food and Nutrition Act of 2008 (the Act) defines eligible food as any food or food product sold for home preparation and consumption (it also includes seeds and plants that produce food for consumption by SNAP households). Prepared food or drinks that are hot at the point-of-sale or food that will be consumed on the premises of the store are not eligible for purchase with SNAP benefits. Products that carry a supplement facts label are classified by FDA as supplements and are therefore NOT eligible under SNAP.
- If SNAP clients receive incentives through the purchase of fruits and vegetables, they may be redeemed for the purchase of any SNAP eligible food products, including fruits and vegetables. If the purchase of fruits or vegetables is not required in order to receive incentives, those incentives must only be redeemable for the purchase of eligible fruits and vegetables or otherwise encourage increased consumption of fruits and vegetables.

What is an incentive for the purposes of FINI?

The term "incentive" means any financial or non-financial inducement that would increase the purchase and consumption of eligible fruits and vegetables by SNAP clients.

- Examples of allowable financial incentives include, but are not limited to, vouchers redeemable for eligible fruits and vegetables; vouchers or benefits redeemable for other SNAP-eligible items that are received for having purchased fruits and vegetables; and direct point-of-sale discounts on eligible fruits and vegetables.
- Examples of allowable non-financial incentives include, but are not limited to, giveaways of eligible fruits and vegetables; and nutrition education.
- Examples of unallowable incentives include, but are not limited to, giveaways of alcohol, tobacco, firearms, and lottery tickets.

Incentives that are not allowed may not be paid for with either Federal or matching funds. In addition, the cost of incentives must be allowable under the applicable cost principles in 2 CFR §200, Subpart E. Please also see information below on the SNAP equal treatment provision, which impacts whether and how awardees can provide non-incentive benefits to SNAP participants.

Priority will be given to grant proposals with incentives that are most likely to directly and efficiently increase the purchase and consumption of eligible fruits and vegetables by SNAP clients. Any grant proposal that includes non-financial incentives will be subject to additional scrutiny prior to approval, and would need to explain clearly how it contributes to the overall objectives of this program. In general, USDA expects non-financial incentives, if used, to be supplemental to a strong financial-based incentive.

What is the SNAP equal treatment provision and how does it affect FINI grantees?

- SNAP regulations at 7 CFR §278.2(b) require that SNAP clients receive treatment equal to that received by other customers at all retail stores participating in the Program. This provision prohibits both negative treatment (such as discriminatory practices) as well as preferential treatment (such as incentive programs).
- Because the statutory language of the 2014 Farm Bill requires FINI grantees to provide incentives specifically to SNAP client households, the SNAP equal treatment provision does not apply to FINI grantees for the purpose of providing incentives through a FINI grant project.
- Please note that it remains prohibited, per the SNAP equal treatment provision, to treat SNAP client households any differently than any other kinds of customers for any purpose other than the administration and disbursement of incentives through a FINI grant project. If a FINI grantee proposes to treat SNAP customers differently, in any way beyond the disbursement of incentives, they must apply to FNS for a waiver. If, for example, a FINI grant program project proposes to treat SNAP customers differently than other customers by offering SNAP customers free tote bags, which are not identified as incentives, that are not otherwise offered to other customers, then that grantee would be required to apply to FNS for a waiver of the SNAP equal treatment provision.

To which Agency should questions about FINI projects and SNAP policy be directed?

Questions regarding FINI grant projects, including any deviations from project implementation as described in the grant proposal, should be directed to NIFA. Questions regarding project evaluation, EBT, and SNAP policy should be directed to FNS.