

## **Food Stamp Nutrition Education (FSNE) Framework Q and As**

### **1. Why is FNS proposing a new approach to FSNE?**

Food Stamp Nutrition Education has experienced considerable growth in the past decade. Federal funds approved for FSNE went from \$661,000 in 1992 to over \$192 million in 2003. Despite this growth, a January 2004 OMB Performance Assessment of the Food Stamp Program noted “The *program is better designed to reduce hunger and malnutrition related to inadequate income, than to achieve further incremental improvements in the dietary status of low income people.*” This OMB finding reinforced a growing concern at FNS that nutrition education was not a recognizable part of the Food Stamp Program, was not reaching food stamp program participants and that some nutrition education activities and expenditures may be of little direct benefit to them. For this reason, we have proposed a new framework and are asking for input on how to improve performance in this area of the FSP.

### **2. What processes has FNS used to solicit public input?**

FNS Administrator Salazar convened a small group of key stakeholders for a roundtable discussion on the proposed FSNE Framework on March 30, 2004. The stakeholders provided valuable input at the meeting and were also invited to submit written comments on the proposed Framework. Revisions were made and the Framework was posted on the FNS website in May. An online system is available for interested persons to submit comments to FNS by July 27<sup>th</sup>. FNS plans to do a thorough comment analysis and share the rationale for its decision-making on the comments as a part of the process of finalizing the Framework.

### **3. Would this new approach prohibit or discourage the use of social marketing campaigns?**

No. FNS encourages States to use a multifaceted approach to help food stamp participants improve their eating and physical activity behaviors. Social marketing is one important component of this effort. As stated in the proposed framework, social marketing campaigns must be targeted to Food Stamp Program (FSP) participants and applicants. The framework emphasizes that the ability to demonstrate this focus, along with other factors, will play a paramount role in the approval of any exclusivity waivers that make social marketing activities possible. For instance, States would not be reimbursed for the total cost of social marketing campaigns directed at the general public, but instead would need to pro-rate the costs that could be attributed to reaching food stamp participants.

#### **4. Why does FNS want to focus on Food Stamp participants and applicants?**

The Food Stamp Act is clear that the purpose of nutrition education financed by the Food Stamp Program is to benefit FSP applicants and participants. Although FNS recognizes that it is not always practical to limit FSNE interventions solely to program participants, we believe that nutrition interventions should have the primary purpose of helping food stamp households make the connection between their food choices and food stamp benefits. The main goal of FSNE should be to improve the likelihood that participants and applicants make healthy choices within a limited budget and choose active lifestyles consistent with the current Dietary Guidelines and Food Guide Pyramid. The proposed framework continues to provide for exclusivity waivers because we do recognize that certain kinds of interventions such as social marketing campaigns inevitably spill over onto non-food stamp households.

#### **5. Would this focus mean that FSNE will have to be conducted in FS offices?**

No. The proposed framework emphasizes the importance of linking food stamp benefits with nutrition education services by providing information, nutrition education sessions, and demonstrations in food stamp offices or other locations where food stamp participants congregate. It does not state that the food stamp office will be the only allowable venue for FSNE. However, it is expected that the FSNE providers will work with the food stamp office to ensure that FSNE is linked to food stamp benefits and that nutrition education messages are reinforced within the food stamp office. This reinforcement of messages may be any number of formats depending on the space and circumstances of the food stamp office, ranging from nutrition posters to onsite FSNE classes.

#### **6. Would FNS expect that FSP caseworkers will provide nutrition messages to clients?**

No. FNS recommends that only trained, qualified nutrition professionals and paraprofessionals conduct nutrition education. It is unlikely that FSP caseworkers would have the training, background, or time to provide nutrition education to clients. However, they could, and probably should provide information to clients on the types of FSNE available, how to access these services, and the potential benefits of FSNE participation. Further, the food stamp office environment should reinforce FSNE messages. Ideally, FSP caseworkers, as part of this environment, will model healthy lifestyle practices for FSP participant and applicants. To aid in this effort, FNS is encouraging wellness programs for food stamp office staff.

**7. Would this new policy approach prohibit FSNE in school settings?**

No, but it would not permit the use of FSNE funds for all nutrition education in schools. The framework emphasizes the need to focus nutrition education on FSP participants and applicants. An exclusivity waiver may be approved for FSNE in school settings (i.e., schools that serve a majority of children qualifying for free lunch and/or when school-based nutrition education is supplemental to and coordinated with education provided to FSP households containing women with children). School-based FSNE efforts that meet waiver requirements will also need to comply with the current FSNE policy guidance.

**8. Why did FNS select women with children as the target audience?**

To focus food stamp nutrition education resources more effectively, FNS selected women with children who are FSP participants or applicants as the primary target audience. FNS feels this approach will reach the greatest number of participants possible with targeted nutrition education, based on the characteristics of food stamp households. Moreover, both women and children frequently make or strongly influence the food purchasing decisions in the family household. While women with children and children are the designated primary and secondary audiences for FSP nutrition education, respectively, States may also serve other segments of FSP participants (such as the elderly).

**9. Would this mean that others like the elderly can not be served?**

No. States may also target other food stamp participants or applicants as resources allow. This could include all other food stamp participants or applicants, such as elderly persons, men, and single adults.

**10. When would a new set of requirements go into effect?**

It is anticipated that the Framework will be finalized by early fall 2004. FNS is currently examining the possibility of gradual implementation, with intermediate and final changes in the FY 2006 and FY 2007 Food Stamp Nutrition Education Plan Guidance.

## **11. How can I be assured that FNS will seriously consider my comments?**

FNS will review, analyze, categorize and carefully consider all comments received in its final determinations regarding the proposed Framework. The comment process is an opportunity for the public and our stakeholders to express their views and opinions, and suggestions. Those comments which help make a stronger, more viable Framework will be critical to the future design of the Framework. Comments are reviewed on the basis of their rationale, so while the number of comments is important, their substance and thoughtfulness is more important. Comments which clearly seek to take FSP nutrition education beyond its legislative scope will be less helpful to the process. We believe the final product will be most successful because of thoughtful comments that help us work together as partners in improving the nutritional health of the food stamp participant.