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United States
Department of
Agriculture

Food and
Nutrition
Service

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Alexandria, VA
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SUBJECT: SNAP – Allowable Forms of Grant Project Promotional Activities in the USDA's FINI Grant program

TO: All FY15 FINI Grantees
FY16 FINI Grantees
FY17 FINI Applicants

This memorandum provides updated guidance to Food Insecurity Nutrition Incentive (FINI) grantees and FINI grant applicants regarding the restrictions on Supplemental Nutrition Assistance Program (SNAP) promotion.

Each year's FINI Request for Applications (RFA) and the August 2016 FINI Frequently Asked Questions (FAQs) have allowed FINI grantees to promote FINI grant projects so long as such promotional materials met the following two criteria:

1. such promotion or educational campaigns are rendered in a medium other than television, radio, or billboards; and
2. such promotion of educational campaigns are factual statements intended to inform, not to persuade.

These restrictions on allowable promotional activities have been of concern to FINI grantees since the beginning of the FINI grant program. FNS understands that these restrictions can complicate the efforts of FINI grantees to inform SNAP recipients about FINI grant projects and that such barriers may adversely affect the success of individual FINI grant projects and the FINI grant program as a whole. In consideration of these realities, FNS has reevaluated these restrictions.

FINI grantees may promote or advertise their FINI grant projects using Federal and/or match funds using any media, including television, radio, and billboards. Regardless of format, however, promotional activities funded with Federal and/or match funds must present factual statements intended to inform, not to persuade. Promotional activities may include locational information about retailer partner outlets (i.e., the address of retail food stores participating in the grantee's project). Promotional materials may also specify that retailer partner outlets accept SNAP and EBT (this includes appropriate logo use as outlined at <http://www.fns.usda.gov/sites/default/files/snap/SNAP-Logo-Guidance.pdf>). Finally, promotional activities may include information describing the mechanics of the grantee's project (e.g., spend \$1 on fruits or vegetables and earn \$1 to spend on more fruits or vegetables). Under no circumstances should FINI grantees engage in any activities intended to persuade or recruit individuals to apply for SNAP benefits. The use of Federal and/or match funds to employ personnel tasked with enrolling individuals in SNAP is strictly prohibited.

Allowable promotional activities must be limited to factual statements and FINI grantees should generally avoid emotional appeals in their promotional activities.

Pursuant to this change to FINI policy, a television, radio, or billboard advertisement that stated the following would be an allowable expense: "Fresh fruits and vegetables are 50% off when you shop with your EBT card at the Main Street Farmers Market. The market is open all day every Wednesday and Friday on the corner of Maple and Elm Streets." The following example, however, would still be an unallowable expense regardless of format: "Sign up to receive SNAP benefits and then you can also get 50% off fresh fruits and vegetables at the Main Street Farmers Market! Eating fruits and vegetables will keep you and your family healthy and happy, so come on down to the market every Wednesday and Friday on the corner of Maple and Elm Streets!" Any promotional activity that is not considered allowable may be paid for only with third stream of funds (i.e., neither Federal, nor match funds).

If you are unclear as to whether a specific promotional material is acceptable it can be submitted to FINI@fns.usda.gov for review by FNS.

Questions regarding this change, general SNAP policy, or Electronic Benefit Transfer (EBT) systems may also be directed to Daniel Cline. He can be reached at Daniel.Cline@fns.usda.gov or (703)-605-4388.

/s/

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