

Food and Nutrition Service

# **Supplemental Nutrition Assistance Program Fraud Framework Implementation Grant SNAP FFIG**

Fiscal Year 2025 Request for Applications (RFA) Assistance Listing Number (ALN): 10.535

July 1, 2025 **Release Date:** 

Application Due Date:	July 31, 2025; 11:59 pm, Eastern Daylight Time (EDT)
Anticipated Award Date:	September 2025

This information is being collected to assist the Food and Nutrition Service (FNS) in reviewing grant applications for the SNAP Fraud Framework Implementation Grant program. This is a mandatory collection and FNS will use the information to select application for award. This collection does request personally identifiable information under the Privacy Act of 1974. According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0512. The time required to complete this information collection is estimated to average 45 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 1320 Braddock Place, 5th Floor, Alexandria, VA 22314 ATTN: PRA (0584-0512). Do not return the completed form to this address.

# **Application Checklist**

This Application Checklist provides applicants with a list of the required actions and documents that must be completed. However, FNS expects that applicants will read the entire Request for Application (RFA) prior to the submission of their application and comply with all requirements outlined in the solicitation. The Application Checklist is for applicant use only and should not be submitted as part of the Application Package.

Complete the following at least four weeks prior to submission:

- □ Obtain a Unique Entity Identifier (UEI) number.
- □ Register the UEI number in the System for Award Management (SAM); and,
- □ Register in <u>grants.gov</u>.

### When preparing your application, ensure:

Application format and narrative meet the requirements included in Section 4 –
 Application and Submission Information. This includes page limits, priorities outlined in
 Section 5 – Application Review Information, and all necessary attachments.

When preparing your budget, ensure the following information is included:

- $\Box$  All key staff proposed to be paid by this grant.
- □ The percentage of time the Project Director will devote to the project in full-time equivalents (FTEs).
- □ Your organization's fringe benefit rate and amount, as well as the basis for the computation.
- □ The type of fringe benefits to be covered with Federal funds.
- □ Itemized travel expenses (including type of travel), travel justification, and basis for lodging estimate.
- □ Types of equipment and supplies, justifications, and estimates, ensuring that the budget is in line with the project description.
- □ Information for all contracts and justification for any sole-source contracts
- □ Justification, description, and an itemized list of all consultant services.
- Indirect cost information (either a copy of a Negotiated Indirect Cost Rate Agreement (NICRA) or if no agreement exists and the applicant has never been approved for a NICRA, they may charge up to 15% de minimis). If an applicant is requesting the de minimis rate or indirect costs are not required, please state this in the budget narrative.

When **submitting** your application, ensure you have submitted the following:

- SF-424 Application for Federal Assistance (fillable PDF in Grants.gov)
- SF-424A <u>Budget Information and Instruction Form</u> (fillable PDF in Grants.gov)
- SF-424B <u>Assurances for Non-Construction Programs</u> (fillable PDF in Grants.gov)
- □ SF-LLL <u>Disclosure of Lobbying Activities</u>
- AD-3030 Representations Regarding Felony Conviction and Tax Delinquent Status for Corporate Applicants (fillable PDF in Grants.gov). This document is only required if your organization is a corporation. The form is located in the optional tab of the grants.gov application package.

□ FNS-906 – Grant Program Accounting System & Financial Capability Questionnaire Negotiated Indirect Cost Rate Agreement (PDF - Upload using the "Add Attachments" button under SF-424 item #15)

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# 1. Program Description and Objectives

# **Executive Summary**

Consistent with USDA Secretary Rollins' guiding principle to take swift action to minimize instances of fraud, waste, and program abuse in nutrition programs, the Supplemental Nutrition Assistance Program (SNAP) Fraud Framework Implementation Grant Program supports State agency efforts to improve and expand recipient fraud prevention, detection, and investigation efforts using the procedures, ideas, and practices outlined in the SNAP Fraud Framework. Section 29(a) of the Food and Nutrition Act of 2008 (7 U.S.C. 2036b) authorizes FNS to prevent trafficking of SNAP benefits. Based on this authority, Congress has provided funding in annual appropriations in recent years to provide competitive grants to support State agencies in implementing SNAP's Fraud Framework and to strengthen program integrity activities in SNAP. Up to \$5 million has been appropriated in FY 2025 for **State agencies** to implement practices described in the SNAP Fraud Framework and each applicant may apply for up to \$750,000 in funding. This funding opportunity will be offered on a competitive basis.

## Introduction

FNS administers nutrition assistance programs of the U.S. Department of Agriculture, including SNAP. SNAP is the Nation's largest nutrition assistance program and served an average of 41.7 million participants per month in fiscal year 2024. Participants receive their benefits via an Electronic Benefit Transfer (EBT) card. These benefits help supplement SNAP recipients' food budgets so they can purchase more healthy food. FNS works in partnership with State agencies to administer SNAP.<sup>1</sup>

As a reminder, all State agencies have access to the Fraud Framework via PartnerWeb. Successful applications will specifically incorporate one or more of the procedures, ideas, and practices found in the SNAP Fraud Framework in their proposals. This grant opportunity is not intended to support retailer fraud-related projects. It is understood, however, that recipient fraud prevention efforts may necessarily involve collaborative work with SNAP authorized retailers or with FNS to address retailers complicit in committing fraud.

From 2014 to 2017, FNS partnered with 10 State agencies to pilot new strategies and improve the use of analytics to more effectively detect potential fraud, improve administration, and increase oversight. The lessons learned and ideas tested during these pilots led to the development of the SNAP Fraud Framework. The SNAP Fraud Framework is a collection of procedures, innovative ideas, and promising practices to help State agencies improve fraud prevention, detection, and investigation techniques and processes. This framework and its supporting documents are designed to support State Agencies as they develop new efforts or improve existing ones to prevent, detect, and investigate fraud. There is no simple solution to combat fraud and each State may require a different approach to improve program integrity. The SNAP Fraud Framework acknowledges the need for State flexibility by offering a menu of options for State Agencies to implement as they work to improve program operations and efforts.

The SNAP Framework is intended to share best practices with personnel directly administering and enforcing the Food and Nutrition Act of 2008, as amended. It includes sensitive fraud detection and investigative techniques and therefore has not been shared beyond FNS and SNAP State agencies, the only eligible applicants for this grant opportunity. State agencies that do not have access to the SNAP Fraud Framework should contact their FNS Regional Office.

<sup>&</sup>lt;sup>1</sup> Throughout this RFA, "State agencies" refers to the agencies that administer SNAP in the 50 States, the District of Columbia, the Virgin Islands, and Guam.

# **Program Description**

Section 29(a) of the Food and Nutrition Act of 2008 (7 U.S.C. 2036b) authorizes FNS to prevent trafficking of SNAP benefits. Based on this authority, in recent years, Congress has provided funding in annual appropriations to provide competitive grants to support State agencies in implementing SNAP's Fraud Framework and to strengthen program integrity activities in SNAP. Up to \$5 million has been appropriated in FY 2025 for State agencies to implement practices described in the SNAP Fraud Framework. This funding opportunity will be offered on a competitive basis. Throughout this RFA, the term "State agencies" refers to the agencies of the 50 States, the District of Columbia, the Virgin Islands, and Guam that administer SNAP at the State or County level. This is consistent with the definition of State agencies within SNAP regulations at 7 CFR 271.2.

Over the past years, FNS has become aware of increased reports of benefit theft by criminal actors through EBT card skimming schemes.<sup>2</sup> Benefit security and prevention of unauthorized EBT card usage are critical components to ensure SNAP recipients are able to use benefits as intended. The SNAP Fraud Framework Grant provides State agencies with the opportunity to take strong preventive actions to protect recipients from victimization, and to provide tools and supports for recipients to proactively safeguard their benefits.

In addition, SNAP recipients may intentionally violate program rules, which is fraud. Program violations may encompass a number of activities, such as falsifying income or identity in order to be eligible for benefits they may not be entitled to, or by using benefits for anything other than their intended purpose. Recipients who intentionally violate program rules face severe penalties, such as criminal punishment and permanent disqualification from the program. FNS has zero tolerance for fraud and continues to work with its State partners to implement measures to improve program integrity.

Grant applicants should identify projects that best fit the needs of the State and that the State can successfully implement. Additionally, FNS encourages applicants to consider foundational projects that the State agency can build on for future growth in the fraud control area, such as data quality improvement, strategic planning, or the development of a training program. Applicants also may use grant funds for projects that build on previous efforts.

# **Key Objectives**

Below is a list of the Program Objectives. As noted in <u>Section 4, within the "Activities/Indicators</u> <u>Tracker</u>," proposed activities should clearly align to these objectives and their associated activities and indicators.

Application proposals must include at least one of the seven objectives identified below. The proposals can contain more than one objective. Awardees are required to report on progress towards activities aligned with the required objective(s) and must use the FNS-908 Performance Progress Report. Applicants should prepare for the progress reporting requirements **by proposing specific activities which are measurable, achievable, relevant, and time bound.** 

<sup>&</sup>lt;sup>2</sup> The Federal Bureau of Investigation defines skimming as when a device illegally installed on ATMs, POS terminals, or fuel pumps capture data or record cardholders' PINs. Criminals use data to create fake debit or credit cards and then steal from victims' accounts (website).

#	Objective
1	<ul> <li>Organizational Management: Establish and communicate priorities, organize employees, and manage both large-scale and day-to-day processes in order to improve program integrity in SNAP.</li> <li>Examples of the types of activities that would fall under this objective include:         <ul> <li>Establish a strategic plan using SMART principles that address recipient integrity or benefit theft.</li> <li>Improve documentation around recipient fraud or benefit theft processes and procedures that align with strategic priorities.</li> <li>Enhance data analysis skills within fraud unit.</li> <li>Establish processes for transitioning to chip EBT cards.</li> </ul> </li> </ul>
	Incorporate industry standards into benefit theft prevention measures.
2	<u>Performance Measurement</u> : Analyze State agency performance to identify areas of program integrity improvement in SNAP. Examples of the types of activities that would fall under this objective include:
	<ul> <li>Assess the impact of current integrity efforts and initiatives through active monitoring of a defined set of metrics.</li> <li>Measure the effectiveness of EBT card features that assist in the prevention of</li> </ul>
	<ul> <li>benefit theft such as card freeze/lock or out of State transaction blocking.</li> <li>Evaluate the impacts of transitioning to EBT chip cards.</li> </ul>
	<ul> <li>Automate the manual process of data gathering and calculations.</li> <li>Establish specific, measurable, achievable, relevant, and time-bound indicators to track performance.</li> </ul>
	See Appendix for SMART Principles
3	Recipient Integrity Education: Develop or deliver recipient integrity education resources to help recipients to safeguard their SNAP benefits and use them as intended—preventing fraud before it occurs. When producing recipient integrity education materials, State agencies are encouraged to educate the public and applicants about SNAP benefit theft and fraud, rather than emphasize the consequences as a deterrent to applying.
4	<ul> <li>Examples of the types of activities that would fall under this objective include:</li> <li>Develop recipient education materials on how recipients can safeguard their EBT card and on how to identify and respond to suspected card skimming, card cloning, and phishing/smishing scams.</li> <li>Create education materials for how to use EBT card features such as how to freeze/lock an EBT card or block out-of-State or online purchases.</li> <li>Develop materials that encourage SNAP recipients to frequently change their PIN, adopt transaction alerts, or restrict out-of-State or online purchases.</li> <li>Improve recipient integrity education messaging through various channels, in multiple languages, and in plain language rather than in legal jargon.</li> <li>Ensure SNAP recipients as well as the public understand what SNAP fraud is, and how to avoid becoming fraud victims or committing program violations.</li> </ul> Fraud Detection: Improve administrative infrastructure by equipping Eligibility workers and fraud unit employees with the appropriate tools as the agency's first line of defense against fraud.
	Examples of the types of activities that would fall under this component include:

	• Develop fraud detection dashboard with EBT processor to build fraud monitoring reports based on transaction data and/or interactive voice response/call center
	(IVR) data.
	<ul> <li>Strengthen efforts to detect potential fraud at the time of application.</li> </ul>
	<ul> <li>Improve the use of data analytics to monitor EBT card replacements and predict potential incidents of trafficking.</li> </ul>
	• Enhance internal controls to protect against employee fraud.
	• Enhance interactive voice response (IVR) security.
5	Investigations and Dispositions: To improve fraud case management from initial fraud
	referral through disposition.
	Examples of the types of projects activities that would fall under this objective include:
	<ul> <li>Implement a data-driven process for prioritizing SNAP fraud investigations.</li> </ul>
	<ul> <li>Establish standardized procedures for developing effective evidence packages.</li> </ul>
	<ul> <li>Improve internal fraud referral and feedback processes.</li> </ul>
	<ul> <li>Develop call center scripts to gather information from SNAP recipients reporting</li> </ul>
	stolen benefits that could help investigators identify when and where a SNAP
	recipient may have become a victim of an EBT card skimming scheme.
6	Analytics and Data Management: To expand the State Agency's ability to capture and
	analyze data.
	Examples of the types of activities that would fall under this objective include:
	Clean up existing data to eliminate erroneous or duplicate values and improve
	usability.
	<ul> <li>Improve data management processes (e.g., quality, storage, protection, security, standardization).</li> </ul>
	• Collect data on stolen benefits to support future analysis of fraud trends and areas for improvement.
	• Use analytics to detect benefit theft or fraud and analyze fraud trends.
	Improve State data collection practices around reports of stolen benefits.
7	Learning and Development: To invest in training and professional development
	opportunities to promote employee engagement and to ensure employees are aware of
	new and emerging trends in benefit theft and SNAP fraud.
	Examples of the types of projects that would fall under this objective include:
	<ul> <li>Establish a standardized training program for employees throughout the</li> </ul>
	organization that focuses on their roles in recipient integrity activities.
	Create a mentoring or coaching program for professional development in support
	of recipient integrity efforts.
	<ul> <li>Train staff on common benefit theft techniques that clients might report and how to handle a benefit theft report.</li> </ul>
	• Develop training for staff on chip card roll out and implementation.

# 2. Federal Award Information

The following information is intended to provide applicants with information to help make informed decisions about proposal submissions.

- Total amount of funding expected to award: \$5 million
- Anticipated number of awards: Approximately: 10
- Minimum award amount (award floor): \$150,000 per award
- Maximum award amount (award ceiling): \$750,000 per award
- Anticipated award announcement date: September 2025
- Anticipated period of performance (start and end date of the award): September 2025, September 2028
- Application due date: July 31st, 2025 (11:59 PM Eastern Daylight Time (EDT))

Please note:

- Grant awards are subject to the availability of funding and/or appropriations of funds and FNS reserves the right not to make awards.
- FNS reserves the right to use this solicitation and the results of the competition to award additional grants this year or the subsequent fiscal year, should additional funds become available.

## Allowable Costs

- Among other costs, budgets may include expenses related to personnel, equipment and supplies, meeting expenses, travel, and trainings.
- Expenditures for both equipment (i.e., items of personal property having a useful life of more than one year and a cost of \$10,000 or more) and supplies are allowable expenses.
- FNS does not intend for this grant program to fund activities enhancing compliance with existing statutory or regulatory program requirements, such as data matching. FNS will continue to fund all State agency activities through 50% Federal reimbursement of administrative costs.
- Grantees may use grants funds to procure contracts for goods or services.
- SNAP Fraud Framework Implementation Grant-funded projects may benefit other governmental programs; however, grant funds must only support SNAP's share of the project costs.

**Equipment and Supplies**: Expenditures for equipment (i.e., items of personal property having a useful life of more than one year and a cost of \$10,000 or more) are allowable expenses with prior approval by FNS. FNS reserves the right to approve/disapprove these expenditures based on needs as expressed by the proposed project. Supplies do not require a separate specific prior approval outside of the budget/proposal approval process.

# **Unallowable Costs**

**Entertainment:** Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable (such as mascot costumes, promotional items, etc.) unless there is a programmatic purpose, and prior approval is granted by FNS.

All costs proposed in the budget and detailed in the budget narrative must be allowable, reasonable, necessary, and allocable. Refer to <u>2 CFR Part 200 Subpart E – Cost Principles</u> for a

detailed description of all allowable and unallowable costs. A complete listing of selected items of costs is located at 2 CFR 200.420 – 200.476

# 3. Eligibility Information

# **Eligible Applicants**

Entities that do not meet the eligibility definitions will be deemed ineligible and removed from competition without further consideration. The following defines the eligible entities:

- This grant opportunity is only open to State agencies that administer SNAP, consistent with the SNAP regulatory definition of "State agency" at 7 CFR 271.2.
  - For State agencies that are county-administered, a county agency that submits an application must include a letter of commitment or letter of endorsement from the relevant SNAP agency with the application package to be considered for funding. State agencies that are county-administered include: California, Colorado, Minnesota, New Jersey, New York, North Carolina, North Dakota, Ohio, Virginia, and Wisconsin.
  - FNS will consider only one application per State agency.

**Note**: In cases where an applicant is deemed nonresponsive for failing to submit required elements or documents associated with this RFA, they will be considered ineligible and removed from consideration.

# Cost Sharing or Matching Considerations

There are no cost sharing or matching requirements for this program.

# Pre-Award Screening Requirements

In reviewing applications in any discretionary grant competition, prior to making a Federal award, Federal awarding agencies, in accordance with 2 CFR 200.205, are required to review information available through any OMB-designated repositories of government-wide eligibility qualifications or financial integrity information. Additionally, Federal awarding agencies are required to have a framework in place for evaluating the risks posed by applicants before they receive Federal awards. The FNS review of risk posed by applicants will be based on the following:

- SAM.gov, the System for Award Management, the Official U.S. Government system that consolidated the capabilities of CCR/FedReg, ORCA, EPLS, and FAPIIS.
- FNS Risk Assessment Questionnaire
  - Applicants must complete the FNS-906 Grant Program Accounting System & Financial Capability Questionnaire that allows FNS to evaluate aspects of the applicant's financial stability, quality of management systems, and history of performance, reports, and findings from audits. The questionnaire contains several questions that may be an indicator of potential risk.

The evaluation of the information obtained from the designated systems and the risk assessment questionnaire may result in FNS imposing special conditions or additional

oversight requirements that correspond to the degree of risk assessed.

# Acknowledgement of USDA Support

• As outlined in 2 CFR 415.2, grant recipients shall include acknowledgement of USDA Food and Nutrition Service support on any publications written or published with grant support and, if feasible, on any publication reporting the results of, or describing, a grant-supported activity. Grant recipients *may* be asked to host USDA officials for a site visit during the course of their grant award. All costs associated with the site visit will be paid for by USDA and are not expected to be included in grant budgets.

# 4. Application and Submission Information

# Content and Form of Application Submission

FNS strongly encourages eligible applicants interested in applying to this program to adhere to the following applicant format. The proposed project plan should be presented on 8  $\frac{1}{2}$ " x 11" white paper with at least 1-inch margins on the top and bottom. All pages should be single-spaced in 12-point font. The project description with relevant information should be captured on no more than 25 pages, not including the cover sheet, table of content, resumes, letter(s) of commitment, endorsement letter(s), budget narrative(s), appendices, and required forms. All pages, excluding form pages, must be numbered.

## **Special Instructions:**

- Late application submission will not be considered in this competition. FNS will not consider additions or revisions to applications unless they are submitted via Grants.gov by the deadline. No additions or revisions will be accepted after the deadline.
- Letters of support must be submitted with the application through grants.gov. Letters submitted via email will not be considered.
- Applications submitted without the required supporting documents, forms, certification will not be considered.
- Applications missing a written proposal or budget narrative will not be considered and deemed nonresponsive and removed from further consideration.
- FNS reserves the right to request clarification on any application submitted in response to this solicitation.
- Applications not submitted via Grants.gov will not be considered.
- If multiple application packages are submitted through Grants.gov by the same applicant in response to this solicitation, FNS will accept the latest application package successfully submitted. All other packages submitted by the applicant will be removed from this competition.

#### **Cover Sheet**

The cover page should include, at a minimum:

- Applicant's name and mailing address
- Primary contact name, job title, mailing address, phone number and e-mail address
- Grant program title and subprogram title (if applicable)

#### **Table of Contents**

The Table of Contents should include relevant sections, subsections and associated page numbers.

#### **Application Project Summary**

The application should clearly describe the proposed project activities and anticipated outcomes that would result if the proposal were to be funded.

#### **Project Narrative**

The project narrative should clearly identify what the applicant is proposing and how it will address a solution, the expected results and/or benefits once the solution is achieved, and how it will meet the RFA program scope and objectives. The proposed project methodology should describe the project design, address program specific methodology needs, procedures, timetables, monitoring/oversight, and the organization's project staffing.

#### **Activities/Indicators Tracker**

Proposed Activities and indicators measuring success must be mapped to Program Objectives (as described in <u>Section 1 – Program Description</u>) in the below format (note that additional Activities/Indicators can be added as needed).

*Note*: Indicators are defined as any metric you anticipate and will be able to be tracked during the period of performance of the grant. Common examples include Number of People Attended, Number of People Impacted, Number of Conferences Delivered, Number of Materials Created, Number of Trainings, Number of People Trained.

Objective #	1. Recipient Integrity Education
Activity	Develop new recipient integrity materials
Indicator(s)	No. of recipient integrity materials developed
Activity	Communicate necessary information and provide tools to use SNAP
	benefits as intended.
Indicator(s)	No. impacted

#### Example

Objective #	
Activity	
Indicator(s)	

Objective #	
Activity	
Indicator(s)	

#### **Application Budget Narrative**

The budget narrative, formatted as a table, should correspond with the proposed project narrative and application budget. If the budget narrative is not formatted as a spreadsheet (e.g. Microsoft Excel), then it must be accompanied by a spreadsheet with all costs listed and which aligns to the categories on the SF-424. The narrative must justify and support the bona fide needs of the

budget's direct cost. The budget and budget narrative must be in line with the proposed project description. If the budget includes indirect costs, the applicant must provide a copy of its most recently approved Federal indirect cost rate agreement. Budget categories in this table must match those listed on the SF-424A form. The budget table <u>must be formatted to fit on an 8.5 x</u> 11-inch page, with a font no smaller than 11-point Times New Roman. All funding requests must be in whole dollars.

### **Indirect Cost Rate**

A current **Negotiated Indirect Cost Rate Agreement (NICRA)**, negotiated with a cognizant Federal agency, should be used to charge indirect costs. Indirect costs may not exceed the negotiated rate. If a NICRA is used, the percentage and base should be indicated. If the applicant does not have a NICRA, they may charge up to 15% de minimis. If the applicant does not have a current Federal negotiated indirect cost rate (including provisional rate) they may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC). In this instance, the applicant must indicate they are requesting the de minimis rate. An applicant may elect not to charge indirect costs and instead use all grant funds for direct costs. If indirect costs are not charged, the phrase "none requested" should be stated in the budget narrative. For questions related to the indirect cost rate, please work with the Grant Officer as noted in Section 7 of this RFA.

**Note**: Each organization is assigned to a single federal agency (by the Office of Management and Budget) that acts on behalf of all federal agencies in indirect cost rate negotiations and is referred to as the "cognizant agency."

#### **Required Grant Application Forms**

The required grants.gov forms may be previewed at <u>grants.gov/web/grants/forms/forms-</u> <u>repository.html</u>. These forms are part of the grants.gov Workspace application.

- Non-Construction Grant Projects Forms: SF-424 Family
  - Application and Instruction for Federal Assistance (SF-424)
  - Budget Information and Instructions (SF-424A)
  - Assurance-Non-Construction Programs (SF-424B)
- SF LLL (Disclosure of Lobbying Activities)
  - Indicate in your form whether your organization intends to conduct lobbying activities. If you organization does not intend to lobby, write "Not Applicable" in boxes required to be completed.
- FNS-906 (Grant Program Accounting System and Financial Capability Questionnaire)
- Additional Required Forms and Information
  - Unique Entity Identifier (UEI) number. Please see below for further information
  - $\circ$  SAM registration. Please see below for further information.

# 5. Application Review Information

## **Review Criteria**

FNS will pre-screen all applications to ensure the applicants are eligible entities and are in compliance with all Program regulations. States must be in good standing with SNAP program requirements including fully addressing any advance warning letters, adverse payment error rates,

or any adverse State ME findings that may impact the States' ability to implement the SFFIG. FNS will not approve any waivers from Program regulations for any projects submitted in response to this solicitation. Additionally, the review committee will evaluate proposals against the criteria below. The project narrative sections include a point value to indicate the importance of each section; The following selection criteria will be used to evaluate applications for this RFA.

### Soundness or Merit of Project Design (35 points)

*Demonstrated Need*: The proposal clearly describes the need to strengthen program integrity by focusing on at least one component of the SNAP Fraud Framework and provides evidence that the proposed approach is well-suited to solve the identified issue.

Impact: The proposal clearly demonstrates:

- A direct effect on the SNAP State agency process and provides evidence that the changes would help combat recipient fraud and benefit trafficking.
- A clear progression from ideas to practice in a State agency.
- A clear description of the impact the project is expected to make. Impact can be described interms of the degree to which the new or improved processes are expected to help the State agency expand its current efforts to eliminate benefit and/or recipient fraud.

*Quality*: The proposal shows thought, analysis, clarity, and the use of relevant facts and knowledge. This includes a clear understanding of the SNAP Fraud Framework.

Application of the SNAP Fraud Framework: The proposed project integrates principles, procedures, ideas and/or practices outlined in the SNAP Fraud Framework.

*Feasibility:* The application proposes projects that are capable of being accomplished and likely to be implemented. The proposal demonstrates State agency readiness and leadership's interest to implement. It should also demonstrate that the proposed project is appropriate given the current capacity of the agency. We encourage applicants to consider foundational projects that the State agency can build on for future growth in the fraud control area. However, applicants may use grant funds to build on previous developments.

#### Implementation and Evaluation (15 points)

*Timeline:* The proposal includes a project timeline that outlines proposed tasks and demonstrates that sufficient time is allotted for each activity. Period of performance is commensurate with project scope. Activities should be reflected as beginning September 2025 and as being completed within the period of performance allowable for this project which is up to three years (September 2025-September 2028).

*Evaluation:* The proposal describes a well-thought-out, organized review and evaluation process that will measure whether the goals of the project have been met. The evaluation should focus on measuring the impact the project seeks to make through the use of specific, measurable, achievable, relevant, and time-bound indicators. Please be sure to include information on who will measure the goals of the project, how the goals will be measured, when the goals will be measured and what the organization will be measuring.

## Sustainability (20 points)

The proposal shows that the project will be sustained after the grant period ends. The proposal should clearly demonstrate State agency has a plan for sustaining the project after the grant period of performance ends. This also applies to personnel hired under this grant program, as applicable.

A sustainability plan should include the following:

- Identify what resources (staff, training materials, equipment) are needed to sustain the project once the grant ends.
- Identify short-term and long-term sustainability strategies that work with the scope of the project activities.
- Develop a plan and process for ensuring the project is sustainable beyond the award period.

## Budget Appropriateness and Economic Efficiency (20 points)

Budget: The proposal includes:

- A line-item budget in a spreadsheet format such as Microsoft excel or similar please refer to the Application Checklist on page III and BudgetNarrative Checklist in Appendix B to assure each category is addressed in the budget.
- A narrative that demonstrates how funds will be spent, by whom and for what purpose.
- The narrative should provide enough detail for reviewers to easily understand how costs were determined and how they relate to the goals and objectives of the project. There should be adequate justification for budget costs based on current industry costs/standards. Information on costs should be obtained from applicable organizations or from online sources.
- Budget calculations are itemized sufficiently to clearly show how the budget components were developed and costs estimated and derived. Proposed costs are reasonable, necessary, and allocable to carry out the project's goals and objectives.
- All costs align to the categories on the SF-424.

Additionally, a copy of the approved negotiated indirect cost rate agreement must be attached if indirect costs are shown as a budget expense to the project.

If applicable, the budget must show how the costs are allocated among the benefiting programs and demonstrate that this grant is only going to fund SNAP's share.

*Efficiency:* The proposal is cost effective – it demonstrates that the anticipated results are commensurate with the cost of the project.

*Contractual and Consultant Costs:* State agencies who wish to hire a consultant or contract work out mustprovide the following information:

- Consultant's name and description of service
- Itemized list of all direct costs and fees
- Salaries must have the number of personnel including the position title
- Specialty and specialized qualifications as appropriate to the salary
- Number of estimated hours times hourly wages
- All expenses and fees directly related to the proposed services to be rendered to the project

Applicants that are required to issue a bid should provide a narrative explaining the requirement and provide a reasonable estimate of Contractual and Consultant Costs.

**NOTE:** Proposal submissions that omit the required budget narratives and/or line-item descriptions will not receive the full point value for this criterion. Therefore, applicants should recognize that a well-written budget narrative that justifies the proposed project expenditures assists the reviewers during the review process.

#### Staff Capability and Management (10 points)

*Oversight:* The proposal demonstrates that effective and consistent oversight by qualified project managers will be implemented throughout the project.

*Communication:* The proposal demonstrates that effective communication will exist within the organization. The proposal includes an organizational chart of the proposed project.

*Staff:* The proposal identifies the project director or manager and other key staff providing oversight over this project The proposal includes resumes that demonstrate that the proposed staff has the appropriate technical and experiential backgrounds for their proposed roles. If the applicant is unable to identify the project director or manager and key staff, it must include with the application package job descriptions for positions that must be assigned. Applicants should address their contingency or back-up plans in the event of key staff departures.

*Time Commitment:* The proposal outlines the amount of time and effort the project director or manager, key staff, and, if applicable, partnering organizations, will contribute to the project.

#### **Total Points Available:** 100

### **Review and Selection Process**

Following the initial screening process, FNS will assemble a panel group to review and determine the technical merits of each application. The panel will evaluate the proposals based on how well they address the required application components and array the applications from highest to lowest score. The panel members will recommend applications for consideration for a grant award based on the evaluation scoring. FNS may request information from the applicant not clearly addressed in their proposal. The Selecting Official reserves the right to accept the panel's recommendation or to select an application for funding out of order to meet agency priorities or geographical representation. FNS reserves the right to use this solicitation and the results of the competition to award additional grants in the next fiscal year should additional funds be made available. FNS also reserves the right not to make awards.

# 6. Application Submission Information

### Submission Date

Complete grant applications must be uploaded to <u>grants.gov</u> by 11:59 PM EDT on the due date listed on the cover page.

- Applications must be submitted via grants.gov. Mailed, emailed, or hand-delivered application packages will not be accepted. For further instructions, see the "Preparing for Electronic Application Submission through Grants.gov" below.
- Late or incomplete applications will not be considered.
- FNS will not consider additions or revisions to applications unless they are submitted via grants.gov by the deadline. No additions or revisions will be accepted after the deadline.
- If multiple application packages are submitted through grants.gov by the same applicant in response to this solicitation, FNS will accept the latest application package successfully submitted. All other packages submitted by the applicant will be removed from this competition.
- Those applicants who fail to submit any required documents or forms will be deemed NONRESPONSIVE, and therefore will be INELIGIBLE to participate in the competition and removed from further consideration.

FNS strongly encourages applicants to <u>begin the registration process at least</u> four weeks before the due date and to submit applications to grants.gov at least **one week** before the deadline to allow time to troubleshoot any issues should they arise. Please note that upon submission, grants.gov may send multiple confirmation notices. Applicants should ensure receipt of confirmation that the application was **accepted**.

**FNS will not accept applications outside of grants.gov**. Applicants experiencing difficulty submitting applications through grants.gov should contact applicant support via the toll-free number 1-800-518-4726 and email at <a href="mailto:support@grants.gov">support@grants.gov</a>. This service is available 24/7.

# Preparing for Electronic Application Submission through Grants.gov

Applicants must register with <u>grants.gov</u> and <u>SAM.gov</u> in order to submit an application to FNS via grants.gov as required.

In order to submit an application, you must:

1. Obtain a UEI number

## What is a Unique Entity Identifier (UEI)?

A UEI is a unique number assigned to all entities (public and private companies, individuals, institutions, or organizations) who register to do business with the federal government. For more information, visit https://sam.gov/entity-registration.

*Note:* After April 4, 2022, entities can register in SAM.gov and will be assigned their "SAM UEI." They will no longer obtain or use a "DUNS UEI" for entity registration or reporting. For additional information on the UEI process, please visit <u>SAM.gov</u>.

## 2. Register in the System for Award Management (SAM)

- On April 4, 2022, the UEI used across the federal government changed from the DUNS number to the UEI (generated by SAM.gov).
- SAM combines federal procurement systems and the Catalog of Federal Domestic Assistance into one system. Visit <u>SAM.gov</u> for additional information.

- To register, you must have your organization's UEI, the organization's Tax ID Number (TIN), and taxpayer name (as it appears on the last tax return). It may take up to 5 to 7 business days or more to register and/or complete the migration of permissions and/or the renewal of an entity record.
- All applicants must have current SAM status at the time of application submission and throughout the duration of a Federal Award in accordance with 2 CFR Part 25.
- FNS strongly encourages applicants to <u>begin this process at least **3 weeks** before the due date of the grant solicitation.</u>

#### 3. Create a Grants.gov Account

The next step in the registration process is to create an account with grants.gov. Applicants must know their organization's Unique Entity Identifier (UEI) to complete this process. For more detailed instruction about creating a profile on grants.gov, visit grants.gov/web/grants/applicants/registration.html.

## How to Submit an Application via Grants.gov

Applicants must apply online using <u>Workspace</u>. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different web forms within an application. For each funding opportunity announcement or RFA, you can create individual instances of a workspace.

For additional training resources, including video tutorials, visit grants.gov/web/grants/applicants/applicant-training.html.

Applicant Support: Grants.gov provides applicants 24/7 support (except Federal holidays) via the toll-free number 1-800-518-4726 and email at <a href="mailto:support@grants.gov">support@grants.gov</a>. If you are experiencing difficulties with your submission, it is best to contact grants.gov support and get a ticket number. The Support Center ticket number will assist the Center with tracking your issue.

For programmatic and financial-related questions regarding this specific grant opportunity, please contact the Grant Officer noted in Section 7 – Federal Awarding Agency Contacts of this RFA.

## **NOTICE: Special Characters and Naming Conventions**

All applicants **must** follow grants.gov guidance on file naming conventions. To avoid submission issues, please follow the guidance provided by grants.gov (per the grants.gov Frequently Asked Questions or FAQ).

Are there restrictions on file names for any attachment I include with my application package? e.g., ! @ # \$ % ^ & \* - '). (\_). For example, Attached\_File.pdf.

If these guidelines for file names are not followed, your application will be rejected. FNS will not accept any application rejected from the grants.gov portal due to incorrect naming conventions.

Additional information can be found at <u>grants.gov/web/grants/applicants/applicant-faqs.html#attachments</u>.

# Grants.gov Receipt Requirements and Proof of Timely Submission

All applications must be received by 11:59 PM EDT on the due date listed on the cover page, as detailed in Section 4 – Submission Date. Proof of timely submission is automatically recorded by grants.gov. An electronic date/time stamp is generated within the system when the application is successfully received by grants.gov. The applicant Authorized Organization Representative (AOR) will receive an acknowledgement of receipt and a tracking number (e.g., GRANTXXXXXXX) from grants.gov with the successful transmission of their application. Applicant AORs will also receive the official date/time stamp and a grants.gov tracking number in an email serving as proof of their timely submission.

When FNS successfully retrieves the application from grants.gov and acknowledges the download of submissions, grants.gov will provide an electronic acknowledgement of receipt of the application to the email address of the applicant with the AOR role. Again, proof of timely submission shall be the official date and time that grants.gov receives your application. Applications received by grants.gov after the established due date for the program will be considered late and will not be considered for FNS funding.

Applicants using slow internet, such as dial-up connections, should be aware that transmission could take some time before grants.gov receives your application. Again, grants.gov will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role. The grants.gov Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the system time to process the application.

File attachment names longer than approximately 50 characters can cause problems processing packages. Please limit file attachment names. Also, do not use any special characters. This includes periods (.) and spacing followed by a dash in the file. To separate words in naming a file, use underscore (\_).

# **Funding Restrictions**

- Pre-award costs will not be permitted for this grant.
- Grant funds cannot be used for the ongoing costs of carrying out an existing project.
- Any application that includes costs related to an existing or ongoing project will have those costs removed from the budget and may also cause the budget score to be marked down.
- SNAP Fraud Framework Implementation Grant-funded projects may benefit other governmental programs; however, grant funds must only support SNAP's share of the project costs.

# 7. Federal Award Administration Information

## **Federal Award Notice**

The Government is not obligated to make any award as a result of this RFA. Unless an applicant receives a signed award document with terms and conditions, any contact from a FNS Grants or Program Officer should not be considered as a notice of a grant award. No pre-award or pre-agreement costs incurred prior to the effective start date are allowed unless approved and stated on FNS' signed award document (FNS-529). Only the recognized FNS authorized signature can bind the USDA, FNS to the expenditure of funds related to an award's approved budget.

#### **Confidentiality of an Application**

When an application results in an award, it becomes a part of the record of FNS transactions, available to the public upon specific request. Information that the Secretary determines to be of a confidential, privileged, or proprietary nature will be held in confidence to the extent permitted by law. Therefore, any information that the applicant wishes to have considered as confidential, privileged, or proprietary should be clearly marked within the application. Any application that does not result in an award will be not released to the public. An application may be withdrawn at any time prior to the final action thereon.

#### Safeguarding Personally Identifiable Information

"Personally identifiable information" means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual (OMB Circular A-130, *Managing Information as a Strategic Resource*).

Applicants submitting applications in response to this RFA must recognize that confidentiality of PII and other sensitive data is of paramount importance to the USDA FNS. All federal and non-federal employees (e.g., contractors, affiliates, or partners) working for or on behalf of FNS are required to acknowledge understanding of their responsibilities and accountability for using and protecting PII in accordance with applicable law, regulation, and policy [e.g., the Privacy Act of 1974; Office of Management and Budget (OMB) Memorandum, M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information*; OMB Circular A-130, *Managing Information as a Strategic Resource* (this is a non-exhaustive list of requirements in this area)].

By submitting an application in response to this RFA, applicants are assuring that all data exchanges conducted throughout the application submission and pre-award process (and during the performance of the grant, if awarded) will be conducted in a manner consistent with applicable Federal laws, regulations, and policies. By submitting a grant application, applicants agree to take all necessary steps to protect PII, including the following: (1) ensuring that PII and sensitive data developed, obtained or otherwise associated with UDSA FNS funded grants is securely transmitted; (2) ensuring that PII is not transmitted to unauthorized users, and that PII and other sensitive data is not submitted via email; (3) data is transmitted via FNS approved file sharing services or encrypted mobile media storage devices; and (4) ensuring that PII is encrypted and password protected both in transit and at rest.

#### **Conflict of Interest and Confidentiality of the Review Process**

The agency requires all panel reviewers to sign a conflict of interest and confidentiality form to prevent any actual or perceived conflicts of interest that may affect the application review and evaluation process. Names of applicants, including State agencies and tribal governments, submitting an application will be kept confidential, except to those involved in the review process, to the extent permitted by law. In addition, the identities of the reviewers will remain confidential throughout the entire process. Therefore, the names of the reviewers will not be released to applicants.

#### **Administrative Regulations**

#### Federal Tax Liabilities Restrictions

None of the funds made available by this or any other Act may be used to enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a

loan or loan guarantee to, any corporation that has any unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability, where the awarding agency is aware of the unpaid tax liability, unless a Federal agency has considered suspension or debarment of the corporation and has made a determination that this further action is not necessary to protect the interests of the Government.

### Felony Crime Conviction Restrictions

None of the funds made available by this or any other Act may be used to enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that was convicted of a felony criminal violation under any Federal law within the preceding 24 months, where the awarding agency is aware of the conviction, unless a Federal agency has considered suspension or debarment of the corporation and has made a determination that this further action is not necessary to protect the interests of the Government.

#### Debarment and Suspension 2 CFR Part 180 and 2 CFR Part 417

A recipient chosen for an award shall comply with the non-procurement debarment and suspension common rule implementing Executive Orders (E.O.) 12549 and 12689, "Debarment and Suspension," codified at 2 CFR Part 180 and 2 CFR Part 417. This common rule restricts sub-awards and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The approved grant recipient will be required to ensure that all sub-contractors and sub-grantees are neither excluded nor disqualified under the suspension and debarment rules prior to approving a sub-grant award by checking the System for Award Management (SAM) at <u>SAM.gov</u>.

#### Universal Identifier and Central Contractor Registration 2 CFR Part 25

Requirement for System for Award Management. Unless you are exempted from this requirement under <u>2 CFR 25.110</u>, you as the recipient must maintain current information in the SAM. This includes information on your immediate and highest-level owner and subsidiaries, as well as on all of your predecessors that have been awarded a Federal contract or Federal financial assistance within the last three years, if applicable, until you submit the final financial report required under this Federal award or receive the final payment, whichever is later. This requires that you review and update the information at least annually after the initial registration, and more frequently if required by changes in your information or another Federal award term.

Requirement for Unique Entity Identifier: If you are authorized to make subawards under this Federal award, you:

- Must notify potential subrecipients that no entity (see definition in paragraph C of this award term) may receive a subaward from you until the entity has provided its Unique Entity Identifier to you.
- May not make a subaward to an entity unless the entity has provided its Unique Entity Identifier to you. Subrecipients are not required to obtain an active SAM registration, but must obtain a Unique Entity Identifier.

## Reporting Sub-award and Executive Compensation Information 2 CFR Part 170

The Federal Funding Accountability and Transparency Act (FFATA) of 2006 (Public Law 109–282), as amended by Section 6202 of Public Law 110–252, requires primary grantees of Federal grants and cooperative agreements to report information on sub-grantee obligations and executive compensation. FFATA promotes open government by enhancing the Federal Government's accountability for its stewardship of public resources. This is accomplished by making Government information, particularly information on Federal spending, accessible to the general public.

Primary grantees, including State agencies, are required to report actions taken on or after October 1, 2010, that obligates **\$30,000 or more** in Federal grant funds to first- tier sub-grantees. This information must be reported in the Government-wide FFATA Sub-Award Reporting System (FSRS). In order to access FSRS a current SAM registration is required. A primary grantee and first-tier sub-grantees must also report total compensation for each of its five most-highly compensated executives. Every primary and first-tier grantee must obtain a UEI prior to being eligible to receive a grant or sub-grant award. Additional information will be provided to grant recipients upon award.

## Duncan Hunter National Defense Authorization Act of Fiscal Year 2009, Public Law 110-417

Section 872 of this Act requires the development and maintenance of a Federal Government information system that contains specific information on the integrity and performance of covered Federal agency contractors and grantees. The Federal Awardee Performance and Integrity Information System (FAPIIS) is designed to address these requirements. FAPIIS contains integrity and performance information from the Contractor Performance Assessment Reporting System, information from SAM.gov, and suspension and debarment information from the SAM. FNS will review and consider any information about the applicant reflected in FAPIIS when making a judgment about whether an applicant is qualified to receive an award.

## Freedom of Information Act (FOIA) Requests

The Freedom of Information ACT (FOIA), 5 U.S.C. 552, provides individuals with a right to access records in the possession of the Federal Government. The Government may withhold information pursuant to the nine exemptions and the three exclusions contained in the Act.

Application packages submitted in response to this grant solicitation may be subject to FOIA by requests by interested parties. In response to these requests, FNS will comply with all applicable laws and regulations, including departmental regulations.

FNS will forward a Business Submitter Notice to the requested applicant's point-of-contact. Applicants will need to review requested materials and submit and submit any recommendations within 10 days from the date of FNS notification. FNS will redact Personally Identifiable Information (PII).

For additional information on the Freedom of Information (FOIA) process, please contact the FNS Freedom of Information Act officer at <u>FOIA@usda.gov</u>.

## USDA Non-Discrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for

prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through Telecommunications Relay Service at 711 (Voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at <u>How to File a Program Discrimination Complaint</u> and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: <u>program.intake@usda.gov</u>.

USDA is an equal opportunity provider, employer, and lender.

### **Privacy Policy**

The USDA FNS does not collect any personal identifiable information without explicit consent. To view USDA's Privacy Policy, visit: <u>usda.gov/privacy-policy</u>.

### Code of Federal Regulations and Other Government Requirements

This grant will be awarded and administered in accordance with the following regulations 2 Code of Federal Regulations (CFR), Subtitle A, Chapter II. Any Federal laws, regulations, or USDA directives released after this RFA is posted will be implemented as instructed.

#### Government-wide Regulations

- 2 CFR Part 25: "Universal Identifier and System for Award Management"
- 2 CFR Part 170: "Reporting Sub-award and Executive Compensation Information"
- 2 CFR Part 175: "Award Term for Trafficking in Persons"
- 2 CFR Part 180: "OMB Guidelines to Agencies on Government-wide Debarment and Suspension (Non-Procurement)"
- 2 CFR Part 200: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards"
- 2 CFR Part 400: USDA's implementing regulation of 2 CFR Part 200 "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards"
- 2 CFR Part 415: USDA "General Program Administrative Regulations"
- 2 CFR Part 416: USDA "General Program Administrative Regulations for Grants and Cooperative Agreements to State and Local Governments"
- 2 CFR Part 417: USDA "Non-Procurement Debarment and Suspension"
- 2 CFR Part 418 USDA "New Restrictions on Lobbying
- 2 CFR Part 421: USDA "Requirements for Drug-Free Workplace (Financial Assistance)"
- 7 CRR Part 16: "Equal Opportunity for Religious Organizations"
- 41 U.S.C. Section 22 "Interest of Member of Congress"
- Freedom of Information Act (FOIA). Public access to Federal Financial Assistance records shall not be limited, except when such records must be kept confidential and would have

been excepted from disclosure pursuant to the "Freedom of Information" regulation (5 U.S.C. 552)

General Terms and Conditions (T&Cs) of FNS grant awards may be obtained electronically in advance of an award. For a copy of T&Cs, please contact the Grant Officer noted in the <u>Agency</u> <u>Contacts</u> (Section 7 – Federal Awarding Agency Contacts of this RFA.

## **Reporting Requirements**

#### **Financial Reports**

The award recipient will be required to enter the SF-425 (Federal Financial Report) into the FNS Food Program Reporting System (FPRS) on a quarterly basis. In order to access FPRS, the grant recipient must obtain login.gov and USDA e-Authentication, verify their identity, and submit an FNS-674 form, which will be provided by the Grant Officer to access FPRS. A final Financial Status report is due 120 days after the termination date. For additional information on FPRS, visit fprs.fns.usda.gov.

### Performance Progress Reports (PPR)

Grantees will be required to submit progress reports to FNS 30 days following the end of each quarterly period, using the FNS-908 PPR form that will be sent to grantees at the time of award or the initial orientation. The reports should cover the preceding period of activity.

A final FNS-908 PPR identifying the accomplishments and results of the project will be due 120 days after the end date of the award.

This report of up to 25 pages will be composed of a short executive summary and the following:

- A project description including a concise summary of the major accomplishments, the difficulties encountered, and the solutions developed to resolve the difficulties.
- A discussion of the project results and lessons learned.

Copies of any deliverables, media or publicity releases/articles and links to materials on websites also should be included or papers resulting from the grant should be attached to the final report. All products should include an acknowledgement of the source of funding. The Federal awarding agency reserves a royalty-free, non-exclusive, and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use, for Federal Government purposes, the copyright in any work developed under a grant, sub-grant, or contract under a grant or sub-grant or any rights of copyright to which a grantee, sub-grantee, or a contractor purchases ownership with grant support.

**Please note**: The FNS-908 PPR form specific to this opportunity will be sent to grantees at the time of award or the initial orientation. Use of the FNS-908 PPR form for progress reports is required. Previous grantees that have not submitted reports timely will be evaluated as high risk. All activities reported on the FNS-908 must align with the required objective(s) from the "Key Objectives" Section above.

# 7. Federal Awarding Agency Contacts

For questions regarding this solicitation, please contact the Grant Officer.

Carla Garcia Grant Officer, Grants and Fiscal Policy Division U.S. Department of Agriculture, FNS Email: carla.garcia@usda.gov

# 8. Other Information

## **Debriefing Requests**

Non-selected applicants may request a debriefing to discuss the strengths and weakness of submitted proposals. This information may be useful when preparing future grant proposals. Additional information on debriefing requests will be forwarded to non-selected applicants. FNS reserves the right to provide this debriefing orally or in written format.

# Appendix

# **SNAP Fraud Trends**

In response to the increase in SNAP benefit fraud, listed below are general examples of current SNAP fraud trends and prevention methods<sup>3</sup>so that State agencies are aware of current SNAP fraud trends and can take appropriate steps to prevent, detect, and respond to false application or certification attempts, phishing, and card skimming schemes.

SNAP EBT Theft Method	Definitions and example recommended preventative measures
Card skimming	Card skimming occurs when a criminal places a reading device on a retailer's point- of- sale (POS) equipment. <sup>4</sup> The reader collects key card information—such as the personal account number (PAN) and personal identification number (PIN)—when a client swipes their card during a transaction. Criminals then use this card information to steal a household's benefits. Examples of preventative measures include: Implement chip and contactless payment technology. Disallow easy-to-guess PINS. Encourage frequent PIN changes: By changing PINs frequently, at least monthly, and doing so before benefit issuance dates, households can minimize their risk of stolen benefits from a previously skimmed EBT card.

<sup>&</sup>lt;sup>3</sup> This information was taken from the November 26, 2024 report to congress

https://www.govinfo.gov/content/pkg/CMR-A98-00191402/pdf/CMR-A98-00191402.pdf

<sup>&</sup>lt;sup>4</sup> Point -of- Sale is the system or device through which a retail transaction is processed and payments from customers are accepted.

Phishing activities	Criminals use scams over text, email, or phone to gather key card information. Increasingly, scams use sophisticated technology to deceive SNAP households. For example, in some States, scammers have spoofed, or imitated, the phone number of a government service agency or the EBT customer service number to obtain key card information from households. Examples of preventative measures include:
	<ul> <li>Sign up for transaction and PIN change alerts: Encourage households to receive alerts when a purchase or PIN change occur. Households can sign up with their EBT processor for text message and/or email alerts. Also, encourage households to routinely check their EBT card balance and immediately report suspicious activity to their State agency.</li> </ul>
Card cloning	Once key card information has been stolen through methods like skimming or phishing, criminals can use equipment to write stolen card information onto blank magnetic stripe cards. Criminals then use cloned cards to steal SNAP benefits after the SNAP State agency reloads benefits to the household accounts. While some cloned cards are physical cards, criminals can also use stolen information to complete card -not -present transactions, like online purchasing.
	<ul> <li>Examples of preventative measures include:</li> <li>Block specific transactions: Educate households on their ability to restrict out of State transactions and online purchasing transactions. Criminals largely use cloned cards to make purchases in a State different from the residence of the cardholder. Households can turn this feature on/off as they desire.</li> </ul>
	• Temporarily Freeze or lock cards: Enable households to temporarily lock all card activity. This would require households to unlock the card before making a purchase. FNS and Administration of the Children and Families received reports that criminals attempt to avoid suspicion by holding onto stolen data for extended periods of time. Then, criminals use cloned cards soon after benefits are available. Freezing a card until a household is ready to use their benefits can prevent unauthorized benefit use.
Algorithmic attacks	Using rapid and repeated inquiries, criminals can use bots to exploit online vulnerabilities to discern key card information. For example, criminals have used this technology to exploit balance inquiry features of SNAP internet retailers to identify valid Primary Account Numbers and Personal Identification Numbers. Bots are also used to identify cards that have positive balances.
	<ul> <li>Examples of preventative measured include:</li> <li>Enhance interactive voice response security: Require authentication for balance inquiries. For example, a caller</li> </ul>

could be prompted to enter the last four digits of the primary cardholder's Social Security Number before receiving any
account information. Therefore, criminals would have a difficult time knowing when benefits are available.

## SMART Principles

- **Specific** Answers questions like What do we want to accomplish? Why is this a priority? Who is involved? Where is it located? Which resources are involved?
- **Measurable** Addresses questions like How much? How many? How will I know when it is accomplished?
- **Achievable –** Addresses questions like How can I accomplish this priority? How realistic is the priority? What are some constraints?
- **Relevant** Addresses questions like Does this seem worthwhile? Is this the right time? How does this fit in with other
- 0
- initiatives and needs? Is this priority assigned to the right accountable owners? Is it applicable in the current political, social and economic environment.

**Time-Bound** – Addresses questions like When will this be completed? What milestone is considered 25% complete toward the priority? 50%? 75%? What can we do six months from now. Six weeks? Today?

States can use SMART principles as guidelines, but these principles should not restrict long-term priorities and visions or stifle creativity. See page 7 of the SNAP Fraud Framework for more details on SMART principles.

# **RFA Budget Narrative Checklist**

## FOR GRANT APPLICANT USE ONLY. DO NOT RETURN THIS FORM WITH THE APPLICATION.

This checklist will assist you in completing the budget narrative portion of the application. Please review the checklist to ensure the items below are addressed in the budget narrative.

**NOTE**: The budget and budget narrative, as well as forms SF-424 and SF-424A must be in line with the proposal project description (statement of work) bona fide need. FNS reserves the right to request information not clearly addressed. All funding requests must be in whole dollars.

ITEM	YES	NO
Personnel		
Did you include all key employees paid for by this grant under this heading?		
Are employees of the applicant's organization identified by name and position		
title?		
Did you reflect percentage of time the Project Director will devote to the project in		
full-time equivalents (FTE)?		
Fringe Benefits		
Did you include your organization's fringe benefit amount along with the basis for		
the computation?		
Did you list the type of fringe benefits to be covered with Federal funds?		

ITEM	YES	NO
Travel		
Are travel expenses itemized? For example, origination/destination points, number		
and purpose of trips, number of staff traveling, mode of transportation and cost of		
each trip.		
Are the Attendee Objectives and travel justifications included in the narrative?		
Is the basis for the lodging estimates identified in the budget? For example, include		
excerpt from travel regulations.		
Equipment		
Is the need for the equipment justified in the narrative?		
Are the types of equipment, unit costs, and the number of items to be purchased		
listed in the budget?		
Is the basis for the cost per item or other basis of computation stated in the budget?		
Supplies		
Are the types of supplies, unit costs, and the number of items to be purchased		
reflected in the budget?		
Is the basis for the costs per item or other basis of computation stated?		
<b>Contractual:</b> (FNS reserves the right to request information on all contractual		
awards and associated costs after the contract is awarded.)		
Has the bona fide need been clearly identified in the project description to justify		
the cost for a contract or sub-grant expense(s) shown on the budget?		
A justification for all Sole-source contracts must be provided in the budget		
narrative prior to approving this identified cost.		
1 11 5		
Other		
Consultant Services –		
Has the bona fide need been clearly identified in the project description to justify		
the cost shown on the budget? The following information must be provided in the		
justification: description of service, the consultant's name and an itemized list of all		
direct cost and fees, number of personnel including the position title (specialty and		
specialized qualifications as appropriate to the costs), number of estimated hours		
and hourly wages per hour, and all expenses and fees directly related to the		
proposed services to be rendered to the project.		
For all other line items listed under the "Other" heading –		
List all items to be covered within "Other" along with the methodology on how the		
applicant derived the costs to be charged to the program.		
Indirect Costs		
Has the applicant obtained a Negotiated Indirect Cost Rate Agreement (NICRA)		
Has the applicant obtained a Negotiated Indirect Cost Rate Agreement (NICRA) from a cognizant Federal Agency? If yes, a copy of the most recent and signed		
from a cognizant Federal Agency? If yes, a copy of the most recent and signed		
from a cognizant Federal Agency? If yes, a copy of the most recent and signed negotiated rate agreement must be provided along with the application.		
from a cognizant Federal Agency? If yes, a copy of the most recent and signed negotiated rate agreement must be provided along with the application. 2 CFR 200 allows any non-Federal entity (NFE) that has never received a		
from a cognizant Federal Agency? If yes, a copy of the most recent and signed negotiated rate agreement must be provided along with the application.		

	y of progress this reporting period, highlighting your greatest achievements and challenges to date in this reporting period. For challenges, how did you resolve
overcome them	? (Max 2000 characters):
2. Personnel In	
a. Number of FT c. If yes, please	rEs: b. Were there any changes in key personnel? Yes No describe the changes in key personnel, including the individual leaving/joining the project as well as the name and contact information (email address, phone
number, and na	me of organization) of the individual. Note: This information does not serve as a formal request to approve the change in key personnel. This request must be Grants Officer in a separate request (Max 2000 Characters):
	nendments (Cost and No-Cost)
	ted amendment(s) require FNS approval? Yes No
c. Please descri	be the type of amendment(s) projected and justification for each. Note: This information does not serve as a formal request to approve amendments. This reque
must be forward	ed to the Grants Officer in a separate request (Max 2000 characters:):
4. Expenditure	×/Durchases:
a. Were there a	ny significant expenditures or purchases, including any contracts entered during this reporting period?
b. If so, please (	lescribe (Max 2000 Characters):
	Changes this quarter outside of the agreed upon budget, timeline, or scope):
	een any deviations? Yes No b. Type: Budget Timeline Scope Other deviation(s), including a justification and impacts to budget/timeline (Max 2000 characters):
d. Please descri	be proposed activities to mitigate the impact of the deviation(s) (Max 2000 characters):
	Page 2
Program Mar	
6. Upcoming A	agement Information (Continued) ctivities and Anticipated Changes
6. Upcoming A	agement Information (Continued)
6. Upcoming A	agement Information (Continued) ctivities and Anticipated Changes
6. Upcoming A	agement Information (Continued) ctivities and Anticipated Changes
6. Upcoming A a. Please descri	nagement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters):
6. Upcoming A a. Please descri b. Do you anticip	agement Information (Continued) ctivities and Anticipated Changes
6. Upcoming A a. Please descri b. Do you anticip	agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No
6. Upcoming A a. Please descri b. Do you anticip	agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No
6. Upcoming A a. Please descri b. Do you anticip	agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No
6. Upcoming A a. Please descri b. Do you antici c. If yes, please 7. Final Report	agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No explain the anticipated changes (Max 2000 Characters): Ing Summary (Final Reporting Period Only)
6. Upcoming A     a. Please descri      b. Do you anticip     c. If yes, please      7. Final Report     a. Are all goals :	agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No explain the anticipated changes (Max 2000 Characters):
6. Upcoming A     a. Please descri      b. Do you anticip     c. If yes, please      7. Final Report     a. Are all goals :	Agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No explain the anticipated changes (Max 2000 Characters): ing Summary (Final Reporting Period Only) and objectives completed at this time? Yes No
6. Upcoming A     a. Please descri      b. Do you anticip     c. If yes, please      7. Final Report     a. Are all goals :	Agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No explain the anticipated changes (Max 2000 Characters): ing Summary (Final Reporting Period Only) and objectives completed at this time? Yes No
6. Upcoming A     a. Please descri      b. Do you anticip     c. If yes, please      7. Final Report     a. Are all goals :	Agement Information (Continued) ctivities and Anticipated Changes be activities planned for next quarter (Max 2000 Characters): pate any changes in your project timeline, activities or cost? Yes No explain the anticipated changes (Max 2000 Characters): ing Summary (Final Reporting Period Only) and objectives completed at this time? Yes No
G. Upcoming A     A     A. Please descri      D. Do you antici     C. If yes, please      7. Final Report     A. Are all goals     b. If no to answer      c. Was the proje	ragement Information (Continued)         ctivities and Anticipated Changes         be activities planned for next quarter (Max 2000 Characters):         bate any changes in your project timeline, activities or cost?         Yes       No         explain the anticipated changes (Max 2000 Characters):         ing Summary (Final Reporting Period Only)         and objectives completed at this time?       Yes         No         #7 a, briefly describe the goals and objectives that were not completed and why they were not completed (Max 2000 Characters):         ct budget sufficient for meeting the project goals?       Yes         Yes       No
G. Upcoming A     A     A. Please descri      D. Do you antici     C. If yes, please      7. Final Report     A. Are all goals     b. If no to answer      c. Was the proje	hagement Information (Continued)         ctivities and Anticipated Changes         be activities planned for next quarter (Max 2000 Characters):         bate any changes in your project timeline, activities or cost?         Yes         No         explain the anticipated changes (Max 2000 Characters):         Ing Summary (Final Reporting Period Only)         and objectives completed at this time?         Yes         No         ar 7a, briefly describe the goals and objectives that were not completed and why they were not completed (Max 2000 Characters):
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G. Upcoming A     A     A. Please descri      D. Do you anticip      D. Do you anticip      C. If yes, please      Are all goals     D. If no to answer      C. Was the proje     d. If no to answer	agement Information (Continued)         ctivities and Anticipated Changes         be activities planned for next quarter (Max 2000 Characters):         bale any changes in your project timeline, activities or cost?       Yes         bale any changes in your project timeline, activities or cost?       Yes         explain the anticipated changes (Max 2000 Characters):         and objectives completed at this time?       Yes         r 7a, briefly describe the goals and objectives that were not completed and why they were not completed (Max 2000 Characters):         ext budget sufficient for meeting the project goals?       Yes         r 7c, briefly describe why the budget was insufficient for meeting the project goals (Max 2000 Characters):
G. Upcoming A     A     A. Please descri      D. Do you anticip      D. Do you anticip      C. If yes, please      Are all goals     D. If no to answer      C. Was the proje     d. If no to answer	ragement Information (Continued)         ctivities and Anticipated Changes         be activities planned for next quarter (Max 2000 Characters):         bate any changes in your project timeline, activities or cost?         Yes       No         explain the anticipated changes (Max 2000 Characters):         ing Summary (Final Reporting Period Only)         and objectives completed at this time?       Yes         No         #7 a, briefly describe the goals and objectives that were not completed and why they were not completed (Max 2000 Characters):         ct budget sufficient for meeting the project goals?       Yes         Yes       No
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