Questions and Answers about the Request for Applications (RFA) for Round 1 of The Emergency Food Assistance Program (TEFAP) Reach and Resiliency Grant Initiative

Last Updated: February 10, 2022 – Questions added or updated are highlighted in red.

Contents

Eligibility

1. **Are TEFAP State agencies the only State agencies eligible to apply to this opportunity?**
   Yes. As per Section 3 of the Request for Applications for TEFAP Reach and Resiliency grants (the RFA), only those State agencies that administer TEFAP, as defined at 7 CFR 251.3, are eligible to apply for TEFAP Reach and Resiliency grant funding.

Project partnerships

2. **Can TEFAP State agencies enter into direct contracts with Tribal partners to distribute TEFAP foods?**

   Yes. Any organization, including Tribal organizations, that meets the definition of TEFAP eligible recipient agency at 7 CFR 251.3(d) is eligible to distribute TEFAP foods. Please see *FD-069 - Eligibility of Indian Tribal Organizations (ITOs) to participate in TEFAP* for more information.

3. **As a TEFAP State agency, how should I work with TEFAP eligible recipient agencies and other organizations to apply for a TEFAP Reach and Resiliency grant project?**

   TEFAP State agencies are encouraged to work collaboratively with program stakeholders including TEFAP eligible recipient agencies to form their State's project plan/application. In the plan/application, State agencies may also outline a process to provide grant funds to EFOs and other TEFAP eligible recipient agencies through subgrants.

4. **As a local organization, how should I work with my TEFAP State agency on a Reach and Resiliency grant project?**

   Local organizations should reach out to the TEFAP State agency contact listed on the FNS website: https://www.fns.usda.gov/contacts/contact-map to determine if their TEFAP State agency will apply for the grant and to understand if/how they can be involved with their project plan.

5. **How will TEFAP State agencies select other organizations to work with them on a Reach and Resiliency project?**

   TEFAP State agencies are required to outline in their grant application how they will work with program stakeholders to meet the objective of the grant. Stakeholder involvement will vary by State/Territory. Local organizations interested in partnering with a TEFAP State agency on a Reach and Resiliency project should reach out to the appropriate TEFAP State agency contact listed on the FNS website: https://www.fns.usda.gov/contacts/contact-map, to determine if their TEFAP State agency will apply for the grant and to understand if/how they can be involved with their project plan. Local organizations may also be interested in viewing the FNS webinar, TEFAP Reach and Resiliency: Overview of Grant Initiative, which provides general information about the TEFAP Reach and Resiliency grant initiative and is intended for TEFAP eligible recipient agencies and other local organizations

6. **Does a TEFAP Reach and Resiliency grant project have to be operated/managed by TEFAP State agency staff?**

   The TEFAP State agency must be the main point of contact for the grant and will be responsible for submitting all required reports and overseeing all awarded grant funds. However, eligible recipient agency staff and/or contractual staff may be involved in project management and may be designated as Project Managers or Coordinators. State agencies must list the name and title of all grant Project Manager(s) or Coordinator(s) in the Project Narrative of their grant application, along with a description of their qualifications to manage or coordinate project activities. See Section 4 of the RFA, and Question #8 in Section 4 of the TEFAP Reach and Resiliency Grant Application Template.

7. **If a TEFAP State agency chooses to institute a subgrant process, will new TEFAP eligible recipient agencies need to comply with all TEFAP client intake requirements?**

   All TEFAP eligible recipient agencies that distribute TEFAP foods must meet Federal requirements related to distributing USDA Foods. Partner organizations do not have to meet requirements if they are not involved with distribution of USDA Foods.

8. Are there guidelines that TEFAP State agencies must adhere to for the subgrant process? Does the subgrant process also need to be competitive?

The RFA does not outline requirements for the subgrant process. However, applicants must describe subgrant processes in their Project Narrative. See Section 4 of the RFA and Question #10 in Section 4 of the TEFAP Reach and Resiliency Grant Application Template.

Allowable uses of grant funds

9. Since grantees will not be able to purchase foods with grant funds, will grantees be given additional TEFAP food funding to support program expansion into underserved areas?

USDA will not be distributing additional USDA foods to TEFAP Reach and Resiliency grantees above what is provided to all TEFAP State agencies. TEFAP State agencies may want to think about how to work with currently participating organizations and/or new partner organizations, including second priority organizations as defined at 7 CFR 251.4(h), to reach underserved populations with available resources or when new resources become available. State agencies may also be interested in food purchasing opportunities through the Local Food Purchase Assistance Cooperative Agreement Program (LFPA), an Agricultural Marketing Service initiative that is separate and apart from FNS' TEFAP Reach and Resiliency grant initiative.

10. If the State agency determines that a demographic community is underserved across the entire state, can the plan address the demographic community, rather than focusing on geographic communities?

Maybe. Grant funds are available to expand TEFAP's reach into remote, rural, Tribal, and/or low-income areas that are underserved by the program. The term "underserved areas" is defined in the RFA as those areas where TEFAP is not easily accessible to all eligible populations. State agencies may focus on a specific underserved demographic community as long as the community is in a remote, rural, Tribal, and/or low-income area.

11. Can eligible recipient agencies funded through a Reach and Resiliency grant project provide non-TEFAP food as well, as long as the project helps us increase TEFAP distribution within identified areas?

Yes. Reach and Resiliency projects are intended to expand TEFAP's reach into remote, rural, Tribal, and/or low-income areas that are underserved by the program. TEFAP regulations direct TEFAP State agencies and eligible recipients agencies (ERAs) to maximize the use of foods secured from other sources (7 CFR 251.10(g)), and allow ERAs to incorporate such foods into their distribution of TEFAP foods (7 CFR 251.4(i)).

12. Are lodging and transportation allowable costs in the Travel budget category?

Yes. Lodging and transportation are allowable expenses in the Travel budget category, provided that the travel is necessary to carry out the project plan and does not conflict with guidance provided in the Allowable Costs section of the RFA. Please see Section 2 of the RFA.

13. Can TEFAP State agencies use grant funds to cover expenses incurred now (i.e., salaries of staff that are working to prepare the grant application)?

No. Pre-award costs are not an allowable expense for this grant project. TEFAP Reach and Resiliency grant funds are only available for obligations incurred during the period of performance of the grant, estimated to begin in April 2022.

14. The RFA states that construction or purchase of buildings is not allowed. What about renovations to existing buildings?

Renovation to existing buildings is an allowable use of grant funds.

15. Can grant funding be used to supplant funds already being spent on similar initiatives?

If State agencies are already doing Reach and Resiliency activities, grant funds may be used to pay for those activities as long as they are incorporated into the State's approved project plan. However, activities may only take place within the period of performance for the grant, which is estimated to begin in April 2022.

16. *New Question* Can grant funds be used to pay a full-time equivalent (FTE) staff salary at the State level if the staffer will not be working 100% on the grant and will be supporting other grants in addition to TEFAP Reach and Resiliency?

Not in full. The RFA states on page 6 that FNS will consider funding "staff who are directly involved in organizing, managing, or conducting activities outlined in the proposed TEFAP Reach and Resiliency project plan" and also states on page 6 that staff time must be properly cost allocated between normal TEFAP duties and those activities conducted for the grant. This same logic would apply to work done for other grants (e.g., Commodity Supplemental Food Program grants or TEFAP Farm to Food Bank grants) that the staff member may manage. For example, if the staff member spends 50% of their time managing the TEFAP Reach and Resiliency grant, 25% of their time managing the normal operations of TEFAP, and 25% of their time managing other grants unrelated to the objective of the grant program, only 50% of their salary may be charged to the Reach and Resiliency grant.

Required data submissions/analyses

17. How granular does assessment data need to be for the required assessment of current TEFAP reach?

The RFA does not specify a level of granularity for data submitted in response to the assessment of current TEFAP reach, a required Project Narrative component. See Section 4 of the RFA, and Question #3 in Section 4 of the Reach and Resiliency Grant Application Template for all requirements related to the assessment of current TEFAP reach.

18. Do TEFAP State agencies need to submit a list of ALL current TEFAP eligible recipient agencies in response to Project Narrative requirements?

Yes. All current TEFAP eligible recipient agencies (ERAs) must be included in the list of partner ERAs, including those ERAs that have an agreement with another ERA. ” See Section 4 of the RFA, and Question #2 in Section 4 of the Reach and Resiliency Grant Application Template for all requirements related to the list of TEFAP ERAs.

19. How is “rural” defined for this grant?

The RFA does not define “rural” and allows State agencies the discretion to use a definition of the term “rural” that makes the most sense for them. State agencies will be required to describe how “rural” was defined in the context of their project. See Section 4 of the RFA and Question #4 in Section 4 of the Reach and Resiliency Grant Application Template.

20. Can you provide more guidance on the definitions of “rural, remote, Tribal, and low-income”?

The RFA gives State agencies discretion to define the terms “remote, rural, Tribal, and/or low-income,” and also provides some resources (in the footnote on page 11) that may be useful in identifying those definitions. A few of the resources outlined in the RFA are explained in more detail below:

- **Rural**: USDA’s Economic Research Service (ERS)’ Rural-Urban Continuum Codes are sometimes used to identify urban and rural counties. Counties with a RUCC code between 4 and 9 are often considered to be rural; however, programs sometimes consider a smaller subset of RUCC codes (e.g., 6-9) to be rural if they want to employ a definition that is more restrictive. If looking to utilize a more granular delineation of rural-urban, ERS’ Rural-Urban Commuting Area Codes are also sometimes utilized since they are classified at the census tract level.
- **Remote**: ERS assigns Frontier and Remote (FAR) Codes to zip codes to assist in identifying sparsely-settled, remote areas of the U.S. Codes with higher FAR codes are considered to be more remote; and you can include or exclude certain FAR codes depending on the level of “remote” that you are trying to capture. For

example, you could consider any zip codes with a FAR code of 1-4 to be remote; or you could only consider zip codes with a FAR Code of 3 or 4 to be remote.
- **Tribal**: Areas encompassed by Federal American Indian Reservations, State American Indian Reservations, Off-Reservation Trust Lands, State Designated Tribal Statistical Areas, or Tribal Designated Statistical Areas are often considered when forming definitions of "Tribal."
- **Low-income:** Often, low-income areas are defined to be census tracts where the median income does not exceed 80 percent of the area median income. However, there are many other definitions of "low-income" that could be employed. For example, you may want to utilize a definition that incorporates the TEFAP income guideline threshold in your State.

Budget

21. If planning to use a portion of grant funds to identify underserved populations, how can we identify a budget by category? We may not yet know what resources will be necessary to reach those populations.

State agencies should describe in as much detail as possible all potential activities that will be conducted with grant funds and submit an estimated budget based on those potential activities. If a project is selected for funding, State agencies will be able to work with FNS to make necessary budget adjustments after award.

22. Are TEFAP Reach and Resiliency grantees able to modify a proposed budget if they are unable to obtain planned resources?

Yes. If a grantee is unable to purchase something that was included in their project proposal and would like to replace the unavailable item with another allowable expense, the grantee can request to revise their approved budget. The replacement expense must not be purchased until FNS approves the revision to the SF-424A.

23. In the budget narrative, do we need to include details on exactly what county or distribution site will receive equipment purchased?

No. There are no requirements about how a TEFAP State agency must breakdown the expenses in the budget narrative; however, TEFAP State agencies are encouraged to include as much detail as possible in the budget narrative section so that reviewers are able to see how the Project Narrative and Activities/Indicators sections align with the submitted SF-424A and Budget Narrative. See Section 4 of the RFA and Section 6 of the TEFAP Reach and Resiliency Grant Application Template for a full list of budget narrative requirements.

24. How much grant funding can be retained at the State level vs. at the eligible recipient agency/local level?

There are no requirements on how much funding must be kept at the State level or passed-through to eligible recipient agencies. State agencies have full discretion in this regard. However, applicants are required to indicate the percentage of requested grant funds that will be kept at the State level or that will be expended on State expenses, in their submitted Budget Narrative. Please see Section 4 of the RFA and Question #2 in Section 6 of the TEFAP Reach and Resiliency Grant Application Template.

25. Will State agencies need to match any funds they retain at the State level?

No. There is no required match for these grant funds.

26. Are TEFAP State agencies able to charge their Federal indirect cost rate to the grant?

Yes. A current Negotiated Indirect Cost Rate Agreement (NICRA), negotiated with a Federal negotiating 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, and has never been approved for, a NICRA, the applicant may charge up to 10% de minimis. 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 FNS Grant Officer, Dawn Addison, as noted in Section 7 of the RFA.

27. How should the budget and budget narrative be structured if a State agency plans to pass through, contract, or sub-grant some portion of grant funds?

The SF-424 should encompass the total amount of grant funding requested and the SF-424A should list out the total requested amount by budget category, regardless of the owner of the expense. The total of the sub-recipient funding requests should be listed under the “Contractual” budget category on the SF-424A, and each sub-recipient should provide a completed budget, budget narrative, or statement of work with project expenses that can be uploaded as an additional attachment to the official budget narrative. The attachments should be named so that they are easily identifiable and must show how costs were calculated. For example, if there were three sub-grants planned for TEFAP eligible recipient agencies (ERAs), the State agency would list a total amount for each of these ERAs in the “Contractual” budget category on the SF-424A, and then submit a separate budget narrative for each of these ERAs as attachments to the official budget narrative.

Please note that if such a project is selected for funding, the primary grantee (i.e., the TEFAP State agency) will be responsible for managing all funds, submitting reports, and communicating with FNS.

28. *New question* Are we able to implement a competitive subgrantee process that will take place after award? If so, how should the budget and budget narrative be structured?

Yes. The RFA does not outline specific requirements for the subgrant process. Applicants must describe subgrant processes in their Project Narrative and include all expenses related to the subgrants in the official budget and budget narrative. If a State plans to use a competitive process for awarding subgrants, this should be described in as much detail as possible.

Please note that if FNS is interested in funding a project proposal but determines that a subgrant description or submitted budget/budget narrative is lacking the detail necessary for FNS to determine whether the proposed uses of funding are reasonable, necessary, and allocable; we may request additional clarification from an applicant during the review period or require a grantee to submit subgrantee proposals or budgets to FNS for approval as a condition of a grant award.

29. Is cost allocation necessary for a delivery vehicle (purchased with grant funds) that will be making non-TEFAP deliveries as well as TEFAP deliveries?

The full cost of the vehicle can be charged to the grant as long as the vehicle is necessary for expanding TEFAP's reach into underserved remote, rural, Tribal, and/or low-income areas. Grant funds should be treated similar to TEFAP administrative funds in this aspect. 7 CFR 251.8(e)(1) allows TEFAP administrative funds to pay the direct and indirect expenses associated with both the distribution of USDA Foods as well as commodities secured from other non-Federal sources to the extent that the commodities are ultimately distributed by TEFAP ERAs that have entered into agreements in accordance with 7 CFR 251.2. Policy Memorandum FD-095, *Use of TEFAP Administrative Funds for Foods Secured From Other Sources* reiterates this idea, and clarifies that TEFAP administrative funds cannot be used for costs associated with the distribution of USDA foods from Federal food and nutrition assistance programs other than TEFAP. This means that if the truck is intended for use for other FNS programs in addition to TEFAP, such as CSFP, then a cost breakdown between the two programs would be necessary. However, if only intended for distribution of TEFAP foods and foods secured from other non-Federal sources, a cost allocation is not necessary and the full cost of the vehicle could be charged to the grant.

Dates and Deadlines

30. Why do I keep hearing that TEFAP Reach and Resiliency grant applications are due in April (as opposed to February)?

Applications for Round 1 TEFAP Reach and Resiliency grant funding must be submitted in Grants.gov by **11:59 PM EST on February 18, 2022**.

April 5th is the due date to apply to the Agricultural Marketing Service's Local Food Purchase Assistance (LFPA) Cooperative Agreement Program, which is separate and apart from FNS' TEFAP Reach and Resiliency grant initiative.

31. The RFA states that a Letter of Intent is due January 5, 2022. Is this true?

Yes. TEFAP State agencies interested in applying to the grant opportunity should submit a letter of intent to FNS Grant Officer, Dawn Addison, by January 5, 2022. Please see Section 4 and Appendix C of the RFA.

Reporting

32. Will progress reporting be done on a biennial (every two years) or semiannual (twice per year) timeline?

Progress reporting will be required on a semiannual basis. Please see Section 6 of the RFA for a full description of reporting requirements.

Round 2 Funding

33. Will Round 2 TEFAP Reach and Resiliency funding overlap with the two-year project period for Round 1 funds, or be available to continue support for Round 1 projects?

The second round of TEFAP Reach and Resiliency grant funding will be released with a separate period of performance that may or may not overlap with the period of performance for Round 1 funds. FNS will use lessons learned from this first round of funding to inform the requirements for the second round of funding.

34. Do TEFAP State agencies need to apply to the first round of TEFAP Reach and Resiliency grant funding in order to be eligible to apply for the second round of funding?

No. TEFAP State agencies do not need to apply for the first round of TEFAP Reach and Resiliency funding in order to be eligible for the second round of funding.

35. If a TEFAP State agency is awarded first round funding, are they guaranteed second round funding?

No. State agencies that receive Round 1 Reach and Resiliency grant funding are not guaranteed to receive Round 2 funding.

36. Is the maximum amount of grant funding outlined for each TEFAP State agency in Appendix B reflective of both Round 1 and Round 2 TEFAP Reach and Resiliency grant funding?

The maximum eligible funding amounts for each State agency outlined in Appendix B of the RFA only reflect available Round 1 funds.

37. Do you know when the second round of TEFAP Reach and Resiliency funding will be available?

FNS does not have a specific date for Round 2 funding at this time.

38. Can State agencies apply for both rounds of TEFAP Reach and Resiliency funding?

Yes. TEFAP State agencies may apply for both Round 1 and Round 2 grant funds.