



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

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Washington State Department of Agriculture (WSDA) Food Assistance (FA) Guidance Memo

November 12, 2025

Subject: EFAP and EFAP-Tribal SNAP Response Guidance Memo

Effective Date: 11/03/2025

Applies To: EFAP and EFAP-Tribal Lead Agencies and Sub Agencies

To ensure quick and accurate utilization of EFAP and EFAP-Tribal SNAP Response funding, this Guidance Memo should be referenced alongside – not in lieu of – the information provided in the Lead Agency EFAP or EFAP-Tribal SNAP Response amendment. Contact your FA Regional Representative with additional questions.

About SNAP Response Funds

Governor Ferguson issued a press release on 10/28/25, in response to the possibility that SNAP benefits would not be released in November. The plan to provide funding to food banks on a weekly basis was contingent upon SNAP benefits not being reinstated. This funding became available based on DSHS's projected weekly "underspend" realized by not having to meet the required match while SNAP benefits were stopped. As of 11/07/25, SNAP benefits were reinstated but it is now unclear, given the uncertainty of pending legal actions and the possible end of the federal shutdown, if SNAP benefits will be fully reinstated on an on-going basis. As of 11/10/25 we do not anticipate additional funding but there may be a possibility that we will receive additional funding at a reduced rate, beyond those issued for the first week (11/04/25).

Recognizing the strain that all hunger relief organizations face, WSDA FA worked to reduce administrative burdens on EFAP and EFAP-Tribal Lead Agencies while ensuring that the Governor's intent is achieved. The Governor's directive was clear that WSDA FA will not incur any operating fees and will pass through the full available funding amount to EFAP and EFAP-Tribal Lead Agencies to support the procurement of food.

The SNAP Response funding's core purpose is to bring more food into the emergency food system as quickly as possible through existing EFAP and EFAP-Tribal Agreements. WSDA FA fought hard to gain the flexibility for these funds to also support up to 15% (of the total award) for operational costs. As in past emergencies, WSDA FA has released the standard EFAP voting requirements. These funds give Lead Agencies the maximum flexibility to make decisions regarding how these funds will be deployed to expedite getting food to people in need. The Lead Agency should communicate their plans with Sub Agencies as soon as possible.

Overview

Funding Period: November 3, 2025 – June 30, 2026

Amendment overview:

- SNAP Response funds can be spent on Food, Tribal Vouchers (as applicable), and up to 15% of the total award amount for operational expenses directly related to the procurement of SNAP Response Foods or Tribal Vouchers.
- A unique SNAP Response Invoice Workbook will be provided. No separate client data reporting will be required since all client data is captured in “regular” EFAP and EFAP-Tribal reporting.
- Revision of food procurement requirements that will apply to regular EFAP and EFAP-Tribal as well as SNAP Response funds through June 30, 2026. Agencies must follow their own food procurement policy.
- No match requirement.
- If future SNAP Response funding becomes available, EFAP and EFAP-Tribal Lead Agencies will be notified of their allocation via email, in lieu of an amendment. Once the project closes a final amendment will be issued to account for any additional funding issued by email after the initial allotment.
- The Lead Agency decides how funds will be spent as long as 85% or more is spent on food.

Frequently Asked Questions (FAQ)

Use of funds:

1. Do Lead Agencies (non-tribal) need to conduct an EFAP vote on the use of these funds?

No. The Lead Agency is given maximum flexibility to utilize SNAP Response funding in a manner that was not originally agreed to in the biennial meeting and will not be required to hold a separate vote. This exception has been a standard practice during emergency situations such as this.

However, the Lead Agency must provide written communications (email) to all Sub Agencies to proactively share the specific plans for the SNAP Response funding.

- A copy of this communication should be sent to your Regional Representative.

2. Do Lead Agencies have to pass through these funds?

No. The Lead Agency is not required to pass through funding to EFAP or EFAP-Tribal Sub Agencies but is required to pass through the food procured with these funds across their EFAP service area.

- If an inquiry about how these funds benefited a specific location were to arise, the Lead Agency should be prepared to respond.

3. Can SNAP Response food or funds only go to EFAP or EFAP-Tribal Sub Agencies?

Yes. SNAP Response funds must go to EFAP or EFAP-Tribal Lead Agency or Sub Agency owned, operated, and/or sponsored sites.

4. I am a small Lead Agency with limited experience procuring food in bulk, can I work with another agency to procure and deliver food?

Yes, you may work with other hunger-relief organizations and/or businesses to procure and deliver food on your behalf.

5. What if I want to give SNAP Response food to an agency in my service area that is not already an EFAP site?

- Lead Agencies may request or agree to a vote to onboard new Sub Agencies mid-biennium. Adding new food pantries or a new EFAP Food Bank must still pass by a two-thirds majority.
 - The voting process does not apply to EFAP-Tribal.
- Lead or Sub Agencies may add food pantries as owned, operated, or sponsored sites mid-biennium. In some counties, a vote may be required to bring on additional sites. In other counties, a restriction on adding new distribution sites is undetermined and would only be subject to Lead Agency approval of the site.
 - The voting process does not apply to EFAP-Tribal.
 - *Note: Lead Agencies must ensure all distribution locations can handle food safely, and that client intake practices are following EFAP requirements.*
- Changes to Site Lists at the Lead or Sub Agency level must be submitted to Regional Representatives via an updated Lead Agency site list for the applicable program within 10 days of the change.
- There is no requirement for Lead or Sub Agencies to onboard a new EFAP Sub Agency mid-biennium, and similarly no requirement for Leads to allow Sub Agencies to add EFAP distribution sites mid-biennium.

6. Does an EFAP-Tribal Lead Agency that operates both a food pantry and voucher program need to use these funds to support both types of services?

No. EFAP-Tribal Lead Agencies operating both a pantry and voucher program may choose to use these funds on food purchases for their pantry, issuing additional food vouchers, or any combination of the two.

- If a Tribal Lead Agency is an EFAP-Tribal voucher program only, they may request an amendment to their Agreement allowing for tribal food pantry activities.

7. Should we use these funds as quickly as possible?

Yes, however, SNAP Response Funds are effective through June 30, 2026. Funds are intended to support food banks, food pantries, and tribal voucher programs in responding to the immediate increase in need from people experiencing delays in receiving their SNAP benefits. Agencies may choose to address that immediate need with previously awarded funds including LFPA, LFPA Plus, or LFPA Gap (which expire 12/31/25), TEFAP/CSFP Bridge Funds, or Regular EFAP and or EFAP-Tribal Funds.

- SNAP Response funding can be used later to restore the current/immediate reduction in existing food inventory on account of the increase in demand due to the government shutdown/delay in SNAP benefits.

8. Can A Lead Agency change plans for the use of “regular” EFAP funds as a part of this response?

Yes. A revote on the use of “regular” EFAP funds is allowable. For example, if a county originally set aside funds for the Food Bank to buy food with “regular” EFAP funds, and now the Lead or Sub Agencies would rather designate those funds for pass-through operational costs since SNAP Response funds *must* be used primarily for food purchases, that is allowable. WSDA FA must receive a record of the vote (non-tribal) conducted for any such revisions.

TEFAP/CSFP Bridge Funds similarly allow for the purchase of food and can be passed through to applicable Sub Agencies in the form of food or funds. Lead Agencies determine the best use of these funds in their service area for those programs. Bridge funds can be used to support the Lead Agency’s TEFAP and/or CSFP distribution network.

9. Can the Lead Agency determine how pass-through funds can be spent by their sub agencies?

Yes, the Lead Agency holds agreements directly with the sub agency and has the maximum flexibility to make decisions regarding how these funds will be deployed to expedite getting food to people in need.

- A lead agency may provide specific requirements for pass-through funds. A minimum of 85% of allocated funds may be spent on food.

10. Can a Tribal Lead Agency expand its voucher or food pantry client eligibility policy to include additional people affected by the reduction in SNAP benefits.

Yes. WSDA FA encourages Tribal Lead Agencies to expand services to their community members in a manner that best meets their needs.

- Tribal Lead Agencies must send a copy of their revised client eligibility policy to their regional representative.

Allowable expenses:

1. What costs are allowable?

- A minimum of 85% of the total award must be spent on food purchases or EFAP-Tribal food vouchers.
 - Revisions to the procurement requirements allow agencies to follow their own written procurement policies. This change only applies to food procurement.
 - If the vendor providing the food includes delivery costs (shipping and handling) on the invoice, then that delivery cost may be included in meeting the minimum food procurement threshold of 85%.
 - WSDA FA encourages the purchase of Washington-grown food, but this is not a requirement.
- A maximum of 15% of the total award may be spent on direct operational expenses incurred as a result of procuring and distributing SNAP Response food or EFAP-Tribal vouchers. If costs can be associated directly with distributing and procuring SNAP Response foods or EFAP-Tribal vouchers, this may include:
 - Personnel costs, travel and transportation, and space costs. See 4.B.2 of the SNAP Response Amendment for additional details.
- These proportions (15% operations vs. 85% food/voucher procurement) may vary week-to-week or month to month as long as the total award expenditures satisfy these requirements.
 - Example 1: An agency may have \$500 of staff time spent allocating and issuing these funds to Sub Agencies in one month, and request reimbursement for \$10,000 in food purchases the following month.
 - Example 2: An agency may be reimbursed for \$20,000 worth of food ordered in one month and then request reimbursement for the cost of delivering that food to Sub Agencies throughout the following 2 months.

2. What costs are unallowable?

Review your EFAP or EFAP-Tribal SNAP Response Amendment for additional details. A summary of unallowable expenses are:

- Indirect,
- Costs which cannot be directly associated with the procurement and distribution of SNAP Response foods or vouchers,
- Expired food,
- Equipment, equipment repairs, capital improvements, facilities maintenance and repair costs,

- Essential non-food expenses unless procured through an EFAP-Tribal Food Voucher,
- Eggs produced by caged hens (Eggs must be cage-free),
- Expenses reimbursed using other fund sources,
- Operational costs in excess of 15% of the total award.
 - *Note: these costs may be eligible for reimbursement from other fund sources such as EFAP or TEFAP. Expenses incurred outside of the funding period are unallowable.*

Reporting:

1. Do clients receiving food purchased with these funds need to be SNAP recipients?

No. Existing EFAP and EFAP-Tribal client eligibility rules apply.

- People need to live in the state of Washington and self-attest they are in need of food.
 - *Note: EFAP-Tribal organizations may have a more specific client eligibility policy.*

2. Does client data still need to be gathered during this time?

Yes. There is no exemption to EFAP or EFAP-Tribal data collection or reporting requirement including age ranges, new and returning clients, and pounds of food distributed, or number of food vouchers issued.

- Information is reported as a part of the existing MS Forms EFAP or EFAP-Tribal client data reporting requirements.

3. Is a food inventory report required?

No. A food inventory report is not required.

Award and Billing Requirements:

1. How will Lead Agencies receive notification of additional SNAP Response allocation(s)?

EFAP and EFAP-Tribal Lead Agencies will receive email notification when funds are allocated.

2. Is match required?

No. These funds are exempt from the “regular” EFAP and EFAP-Tribal match requirements.

- These funds cannot be applied towards satisfying the cash match requirement of “regular” EFAP/EFAP-Tribal funds.

3. What do the expenditure categories on the invoice voucher mean?

The invoice voucher workbook has the following expenditure categories. Lead agencies must break out expenses accordingly.

- **Operations:** These are costs directly incurred as a result of procuring or distributing SNAP Response food at the Lead or Sub Agency. Limited to no more than 15% of total award.

- **Lead Agency Food Procurement:** This is food for distribution the Lead Agency purchased using SNAP Response funds. Includes the Lead Agency food bank distribution center (as applicable).
- **Sub Agency FP (Food Pantry) Food Procurement:** This is food a Sub Agency purchased using SNAP Response funds that were passed through to them by the Lead Agency.
- **Sub Agency FB (Food Bank) Food Procurement:** This is food procured by the EFAP Food Bank Sub Agency using SNAP Response funds that is distributed to participating EFAP food pantries for distribution to clients.
- **Vouchers:** These are costs directly incurred as a result of procuring SNAP Response EFAP-Tribal Vouchers by the Lead or Sub Agency. (Applicable to EFAP-Tribal only).

4. What is needed for billing?

The same amount of information that is required for a “regular” EFAP reimbursement request is also required for SNAP Response funds.

- There will be a separate “A-19” invoice voucher workbook for these funds.
- Lead Agencies shall submit a signed invoice voucher a minimum of monthly. If needed, reimbursements can be processed more frequently, but no more than weekly.
 - For details on multiple monthly reimbursement requests, contact your agency’s FA Regional Representative.
- An expanded general ledger showing costs incurred.
- If passing through funds to Sub Agencies, the name of the Sub Agency and amount reimbursed (in the aggregate) should be identified in the backup.
- Regional Representatives may reach out to clarify expenses charged or to request additional backup as needed.

5. What fiscal backup do I need to retain in my organization’s records?

Lead Agencies should follow their own fiscal policies.

- A method justifying how operational costs associated with SNAP Response were determined.
- Vendor invoices for food.
- Supporting documents from Sub Agencies that show eligibility of costs reimbursed by the Lead Agency.
- A written food procurement policy.

6. What will happen to the funding if my organization cannot accept the full or partial allocation?

- The funds may be reallocated, or
- WSDA FA may purchase food on behalf of the Lead agency or reallocate the food to other agencies.

Other Questions:

1. Why are we talking about the SNAP response funding when hunger relief organizations are facing a bigger crisis now?

- Given the state budget deficit and the fact that no other funds have been identified, our options are limited. SNAP Response funds are our focus now so that we can provide some level of immediate relief and provide concrete answers to the many questions we are receiving regarding the SNAP Response funding. At the same time, WSDA FA continues to share the harsh realities facing people struggling to put food on the table and the hunger relief community – it makes a difference. WSDA FA leadership is acutely aware of the bigger issues and is working closely with the Governor's Office, Office of Financial Management, state agencies, emergency management, and advocates.

2. What is the plan for a statewide strategy to address this bigger crisis?

- There is not a single statewide strategy to address the bigger crisis. There is a deep understanding that this is a multi-sector issue and that until those are addressed there is increased pressure on the hunger-relief system. Representative Reeves and other legislators are currently bringing stakeholders together from the many sectors of the food system to develop a statewide strategy in the near-term. WSDA FA will continue to reduce administrative and regulatory burdens where possible, protect existing resources, look for new opportunities and partnerships to increase food and funding, and coordinate communications and policies related to the WSDA FA programming, and WSDA FA's broader efforts related to the food system as a whole.