

Older American Act Nutrition Program Basics

Frequently Asked Questions

Section 1

Q: What is included in the Older Americans Act (OAA)

A: The Title VI-Grants to American Indians, Alaska Native and Native Hawaiian programs to support nutrition, supportive and caregiver services.

Q: Who is eligible for funding?

A: Tribal organizations of federally-recognized Tribes must represent at least 50 Native American elders age 60 and over, under Title III. Under Title VI, the Tribe may determine the age at which an individual is considered an elder. There is no requirement for matching funds.

Q: Are there other grant awards for nutrition and supportive services?

A: The ACL awards separate grant awards to American Indians and Alaska Natives, also known as Part A; to Native Hawaiians, also known as Part B; and Native American Caregiver Support Services, also known as Part C. Grantees who receive a Part A or Part B grant may also apply for Part C.

Q: Who is eligible for Nutrition Services Incentive Program (NSIP) funds?

A: Organizations that provide nutrition services.

Q: What are grantees required to provide, under Title VI?

A: Congregate meals, Home-delivered meals, Supportive services, including information and referral and information and assistance.

Q: What is the purpose of the nutrition program for both Title II and Title VI?

A: Reduce hunger and food insecurity among older individuals; Promote socialization among older individuals; Promote the health and well-being of older individuals; and Delay adverse health conditions resulting from poor nutrition and sedentary behaviors among older individuals.

Q: Can you use Title III or Title VI funds for a grocery bag program instead of congregate or home-delivered meals?

A: No. Grocery delivery may be considered another nutrition service, but the groceries, themselves, cannot be funded with Title III or Title VI funds.

Q: Is Title VI Part A grants just for meal service?

A: No, the grantee may offer and provide other nutrition and health related services with Title VI funding.

Q: I am eligible for Congregate and Home-Delivered Nutrition Services, who else will be eligible?

A: Spouse, regardless of age; Dependent children with disabilities who live with the elder; Volunteers, regardless of age; Caregivers if Title VI C funds are available and there are policies and procedures developed to address service provision.

Q: Are “carry-out” or “take-out” meals eligible for NSIP funding?

A: No, a grantee may develop a policy and procedures that allows short-term, occasional “carry-out” or “take-out” meals in specific circumstances. However, if a grantee wants to establish a “carry-out” or “take-out” meals program, a Tribe may establish this using no Title VI funds, but only Tribal or other funding.

Q: What are the requirements for meal content under OAA Section 339?

A: All meals must adhere to the current Dietary Guidelines for Americans (DGAs); must provide a minimum of one-third the Dietary Reference Intakes (DRIs) if one meal is served, two-thirds of the DRI if two meals are served and three thirds or 100 percentage of the DRI if three meals are served in one day; meals served be appealing to program participants; programs solicit the advice of meal participants. Common ways of ensuring appealing meals and consulting meal participants are consumer satisfaction surveys, suggestion boxes, nutrition advisory councils or just plain talking with participants; programs solicit the advice and expertise of a registered dietitian; programs may offer meals to meet special dietary needs of program participants such as meals to meet the needs of elders with diabetes, heart disease, cancer, etc. if these meals are feasible; meals meet food safety and sanitation standards. Sanitarians from IHS usually use the model food safety code developed by the U.S. Public Health Services. The model code may be adopted by States and Tribes as is or may be changed slightly. Some Tribes post the Food Service Code on their Tribal websites.

Q: Can a program serve meals less often than five days per week?

A: Yes, but this must be noted initially in the Title VI application and justified or reported to the AoA regional office for approval.

Q: Are Elders denied services if they cannot or will not contribute to the cost of a meal whether by volunteering or monetary?

A: No.

Q: What can NSIP funding be used for?

A: Only for purchase of food grown, processed or produced in the United States and used in the program meals.

Q: Can guests and staff be served meals?

A: Yes, but they will be charged the full-cost of the meal.

Q: Can volunteers be served meals?

A: Only those who provide voluntary services during the meal time at the meal site is considered a program participant and may receive a meal (paid for with Title VI funds), be asked for a contribution and counted as an eligible participant.

Q: Where are most congregate nutrition programs held?

A: In senior or community centers.

Section 2

Q. Why is nutrition so important for Elders?

A. Food and meals are more than simply nourishing the body; they also provide security, structure, continuity with the past, control of one's body and environment. Food and meals provide a basis for cultural heritage and traditions. Food provision also means meal sharing which plays a critical social and cultural role helping to decrease social isolation, improve social connectedness, address some social determinants of health and passing on cultural and spiritual practices that are necessary for overall psychological and mental health...supporting the whole person in the community.

Q. How does food interact with the body?

A. Food and the nutrients contained in food are necessary to fuel the body, maintain body processes such as the heart beating, muscles moving, brain functioning and prevent fatigue. They are also necessary to resist infections, heal wounds, and repair body parts.

Q. As we age, how does the body change and how can nutrition assist the body composition?

A. Aging changes the body in many ways, such as:

- Elders may acquire more fat (especially around the middle of the body) and have less lean body mass or muscle. Adequate muscle is essential for both for body functioning and to maintain the ability to remain at home in the community. Because it takes fewer calories to maintain fat tissue, elders need fewer calories as they age.
- Body processes become more efficient; elders need fewer calories to physically do the same things than younger adults.
- Body size may shrink (such as bones, and height decreases); elders need fewer calories to maintain a smaller body.
- Physical activity may lessen because elders may fatigue more easily, because they retire from paying jobs, because they become more sedentary; elders need fewer calories if they are not as active as when they were young.
- But elders still need as many nutrients and sufficient protein to maintain their health and muscles. The tricky part is that they need to consume these adequate nutrients, but fewer calories. Foods need to be nutrient-dense which the amount of nutrients compared to calories.

Q. What are instrumental activities of daily living (IADL) functionality?

A. IADLs allow a person to live at home in the community and include the following activities:

- Cleaning and maintaining a house
- Managing money
- Ability to move around in the community such as driving
- Preparing meals
- Shopping for groceries and other necessities
- Managing medications
- Ability to use the telephone and other communication devices

Q. What are activities of daily living (ADL) functionality?

A. ADLs allow a person to care for themselves and include the following activities:

- Bathing and showering
- Grooming and personal hygiene
- Dressing
- Toileting
- Functional moving around with or without mobility aids such as a cane
- Feeding oneself and eating.

There is a hierarchy of ADLs; early loss is hygiene; mid loss is toilet use and ability to move around; and late loss is the ability to feed oneself.

Q. What are micronutrients?

A. Micronutrients are vitamins and minerals that are found in food.

Q. What are macronutrients?

A. Macronutrients are calories or energy, carbohydrate, fat, and protein (which all contain calories) for various body functions.

Q. Without proper nutrition and exercise, what kind of chronic diseases can arise?

A. Obesity, heart disease, stroke, some types of cancer, and diabetes can be linked to unhealthy eating and sedentary lifestyles. This also means that if a person is overweight or obese they will be less likely to get healthcare.

Q. How can nutrition help prevent or manage these chronic diseases?

A. Decreasing weight issues through healthy eating and increased physical activity will not only help functionality, but also decrease overweight and obesity. Consuming a healthy diet and limiting sodium intake while increasing potassium intake can help manage high blood pressure a risk factor for high blood pressure. Appropriate nutrition therapy is important for managing diabetes.

Q. How often does the US Department of Agriculture issues the Dietary Guidelines for Americans (DGA) and what is it?

A. The Dietary Guidelines for Americans (DGA) is updated every 5 years and is designed to help Americans eat better. These guidelines are targeted at health professionals and policy makers. The Older Americans Act (OAA) Titles III and VI require adherence to the DGAs in planning menus and providing nutrition education and counseling.

Q. What are some healthy eating guidelines that are published in the DGA?

- A. • Follow a healthy eating pattern across the lifespan. All food and beverage choices matter.
- Focus on variety, nutrient density, and amount.
 - Limit calories from added sugars and saturated fats and reduce sodium intake.
 - Shift to healthier food and beverage choices. C
 - Support healthy eating patterns for all.

Q. Where can I find USDA's "Choose My Plate" online to use as a visual of what a meal should look like?

A. <https://www.choosemyplate.gov/>

Q. How much water/ fluid consumption is recommended per day?

A. Six (6) eight-ounce cups of various fluid, separate from foods in the day is recommended.

Q. What are the basic food groups?

- A. • Vegetables
- Fruits
 - Grains
 - Protein foods including meat, poultry, seafood, legumes, nuts and seeds
 - Dairy or dairy alternates
 - Oil

Q. How much of the basic food groups should be adhered to that would be acceptable to elders per day and per week?

A. See table

Food Group	Total Servings Per Day	Total Servings Per Week
Vegetables	2 to 3.5 cups	14 to 24.5 cups
Fruit	1.5 to 2 cups	10.5 to 14 cups
Grains	5 to 10, ½ whole grain	35 to 70
Meat/poultry/eggs/legumes	5 to 7 oz or equivalent	35 to 49 oz
Seafood		8 oz
Nuts/seeds/soy products		4 oz
Dairy or dairy alternate	3 cups or equivalent	21 cups
Oil	5 to 8 teaspoons	35 to 48 teaspoons

Q. Can the DGAs and DRIs be waived?

A. No. According to Sections 339 and 614, all meals provided with Title III, VI and Nutrition Services Incentive Program (NSIP) funds are required to meet the requirements of the DGAs and DRIs. The Older Americans Act (OAA) does not provide the Administration on Aging (AoA) with the authority to waive the requirements.

If adequate nutrition is essential for health and a purpose of Title VI and the Nutrition Program is to promote health, providing meals to meet these requirements is essential.

Q. Is it allowable for a Title VI grantee to provide a meal with Title VI funds that does not meet the nutrient content of the DGAs and DRIs and instead offer a canned supplemental product such as Ensure to meet the requirements?

A. No. A meal funded by Title VI is to be composed of conventional foods, not vitamin/mineral supplements or supplemental foods. Meals funded with Title VI funds are to meet the nutrient content of the DGAs and DRIs without the addition of a supplemental food.

If a Title VI grantee wants to provide a canned supplemental product, it may do so. However, cans of supplemental food products alone do not constitute a meal and cannot be counted as such for the Program Performance Report (PPR) or NSIP.

AoA recommends that the Title VI grantee develop policies and procedures to address this concern.

Q. Are there sources of information about basic nutrition that can be shared with the elders, the Advisory Board, or the Tribal Council?

A. There are multiple tools on-line to help elders, their families and caregivers, and program professionals learn about the nutrition needs of elders. Some of these tools are:

- United States Department of Agriculture, Choose My Plate, <https://www.choosemyplate.gov/>
- Eating on a budget <https://www.choosemyplate.gov/budget>
- Tip Sheets for nutrition education, including eating out, celebrating holidays, choosing health foods, <https://www.choosemyplate.gov/myplate-tip-sheets>
- Quizzes for nutrition education, <https://www.choosemyplate.gov/quiz>
- What's Cooking? A healthy recipe toolkit for household and quantity cooking <https://whatscooking.fns.usda.gov/>
- Older adults <https://www.choosemyplate.gov/older-adults>
- United States Department of Agriculture, nutrition.gov
- Older individuals, <https://www.nutrition.gov/subject/life-stages/seniors>
- Academy of Nutrition and Dietetics Information for seniors <http://www.eatright.org/resources/for-seniors>

Q. Is sea salt healthier for Elders than iodized salt?

A. No, sea salt may have a different flavor and contain minor amounts of minerals, but is significantly more expensive than iodized table salt. Too much sodium regardless of whether it is sea salt or iodized salt contributes to high blood pressure. Iodized table salt contributes an essential nutrient, iodine to the diet.

Q. Is “natural” or unprocessed or brown sugar better for elders?

A. No, most table sugar used in the United States sugar is processed from sugar cane. All sugars provide energy, help some foods taste better, but provide limited nutrient value. Sugars that are components of fruit help meet the sweet flavor that many people want. Added sugars from baked desserts, sweetened beverages, etc. may be consumed in limited amounts as part of a healthy diet but are better used as a food that is sometimes included in the diet rather than an everyday food

Section 3

Q. What is the Title VI Nutrition Program?

A. It is a program that provides congregate and home-delivered meals to Native American communities.

Q. What is the criteria for the healthy meals and food components provided by the Title VI Nutrition Program?

A. The criteria for the healthy meals and food components are listed as:

- Provide meals that are appealing to program participants [Section 339 (2)(B)];
- Provide meals that meet nutritional requirements of the current Dietary Guidelines for Americans (DGAs) [Section 339 (2)(A)(i)];
- Provide meals that contain a minimum of one-third the Dietary Reference Intakes (DRIs) if one meal is served, two-thirds of the DRI if two meals are served and three thirds or 100 percent of the DRI if three meals are served in one day [Section 339(2)(A)(ii)];
- Provide meals that meet special dietary needs if practicable [Section 339 (2)(A)(iii)];
- Provide meals that comply with applicable provisions of State or local laws regarding the safe and sanitary handling of food, equipment, and supplies used in the storage, preparation, service and delivery of meals to older persons [Section 339 (2)(F)];
- Deliver nutrition services to older American Indians, Alaska Natives and Native Hawaiians comparable to Title III nutrition services [Section 601];
- Deliver nutrition services substantially in compliance with the provisions of part C of title III substantially in compliance with the provisions of part C of title III [Section 614(a)(8)];
- Provide nutrition services that are produced and served cost-effectively; and
- Incorporate traditional foods safely and appropriately as much as possible.

Q. What factors influence the meal appeal?

A. Factors that can influence the meal appeal are:

- Individual and group preferences
- Family

- Culture
- Differing health status
- Region of the country
- Age and generational cohorts
- Gender
- Commercial advertising
- Holidays and celebrations

Q. Where can I find information on the Dietary Guidelines for Americans?

A. The information can be found at <https://health.gov/dietaryguidelines/2015/>

Q. What are the DRIs?

A. The Dietary Reference Intakes are the quantitative reference amounts of a nutrient that individuals need to prevent deficiency, be healthy and help manage chronic diseases.

Q. What are the common target nutrition?

A. Macronutrients of calories, protein, carbohydrate, fat, saturated fat and fiber and micronutrients of vitamins A, C, B6, B12, Folic Acid, D, E and minerals of calcium, magnesium, zinc, sodium, and potassium.

Q. What is the most common menu pattern?

A. Healthy U.S.-Style Eating Pattern [https://health.gov/dietaryguidelines/2015/resources/2015-2020 Dietary Guidelines.pdf](https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf)

Q. Are there any requirements for the Title VI Nutrition Program?

A. Yes, The Title VI Nutrition Program is required to follow the state menu planning guidance.

Q. What knowledge do I need to do menu planning?

A. You will need to know the elders' preferences, appeal, nutrient requirements, food production considerations, food safety, and cost.

Q. What is a cycle menu?

A. Cycle menus is when you have a specific list of meals for a certain number of days or weeks. Once the cycle is complete, the same meals in the same order are served again.

Q. What general steps to I use to plan a menu?

A. Steps to use when planning a menu are:

- Allow a block of time, gather recipes and resources
- Determine length of menu cycle
- Identify main dish, usually the protein item
- Identify the side dishes
- Incorporate variety, day to day, week to week

- Incorporate elders' preferences
- Adhere to nutrition requirements
- Use seasonal foods
- Balance more highly seasoned foods with foods that are not highly seasoned; regions vary in preference. Do not mix too many seasoned dishes
- Plan menus that can be made with available staff, equipment, space, and time
- Use readily available food, think about food ordering and cost
- Use traditional foods
- Do not plan for leftovers, second helpings or second meals

Q. What specific steps to I take in menu planning?

A. Menu planning should be planned out using the following steps:

1. Begin with the entree which is usually protein item
2. Add two vegetables side dishes to complement the entrée
3. Add up to two serving of grains, preferably whole grains
4. Add a fruit serving
5. Add dairy/dairy alternate
6. Add a dessert
7. Include other beverages

Customer Satisfaction

Q. I'd like to create a survey for customer satisfaction, are there resources to help?

A. On-line data provides historical surveys and results data, <https://agid.acl.gov/Resources/DataSources/>. Data for 2016 is found at <https://agid.acl.gov/DataFiles/Documents/NPS/SurveyInstrument2016.pdf> . The results are found at <https://agid.acl.gov/CustomTables/NPS/Year/>.

Q. Is the Title VI Nutrition Program required to do customer satisfaction surveys?

A. No. However, the use of customer satisfaction surveys is a basic quality assurance practice, helps ensure that the food is appealing to elders and helps gather ideas for menu planning. In addition, using customer satisfaction surveys and other food production quality assurance methods helps limit food waste and contain costs.

The Administration on Aging (AoA) recommends that the Title VI grantee develop policies and procedures to address customer satisfaction mechanisms.

Q. Can the Title VI Nutrition Program serve only foods that elders like?

A. Because not all elders like the same things, a Title VI Nutrition Program has a difficult challenge of trying to write menus and serve foods that are appealing to many elders. Some elders may prefer foods they ate when they were younger, some prefer more bland foods, some prefer more spicy foods, some prefer healthier foods, some prefer less healthy foods, some prefer lots of desserts, others don't want to be tempted, so it is a challenge. A Title VI Nutrition Program is to meet nutrition requirements (DGAs and DRIs), food safety, cost AND

preferences. If a meal does not taste good, it may be because of the quality or type of food used, the food item selection or the preparation method. Using customer satisfaction mechanisms and quality food production can help meet all these goals. Producing quality food at the front end helps eliminate food waste at the back end.

Q. What is the best way to ensure customer satisfaction?

A. The primary mechanism is to informally talk to elders about their preferences. Some formal mechanisms are: menu committees, food product or menu item sampling, taste panels, food preference surveys, satisfaction focus groups or comment cards.

Q. Does every individual have to take a serving of every food offered?

A. No, each meal consisting of conventional foods must offer foods that meet the nutrition requirements of the OAA. This policy is called offer versus served. An elder is not required to take or consume all meal components. Elders may choose what they want to eat. Serving someone food they won't eat is wasteful. Of course, nothing is simple. If a food item is rejected by most elders, take it off the menu and plan something else. Quality assurance begins with menu planning, consumer preferences, and quality food/preparation/presentation and choice and follow-up customer satisfaction surveys or other mechanisms to assess this.

Nutrition Requirements

Q. Can the DGAs and DRIs be waived?

A. No. According to Sections 339 and 614, all meals provided with Title III, VI and NSIP funds are required to meet the requirements of the DGAs and DRIs. The OAA does not provide the AoA with the authority to waive the nutrition requirements.¹

If adequate nutrition is essential for health and a purpose of Title VI and the Nutrition Program is to promote health, providing meals to meet these requirements is essential.

Ensuring meals meet the DGAs and DRIs helps ensure Title III and Title VI coordination since programs will be meeting similar standards.

Q. Is it allowable for a Title VI grantee to provide a meal with Title VI funds that does not meet the nutrient content of the DGAs and DRIs and instead offer a canned supplemental product such as Ensure to meet the requirements?

A. No. A meal funded by Title VI is to be composed of conventional foods, not vitamin/mineral supplements or supplemental foods. Meals funded with Title VI funds are to meet the nutrient content of the DGAs and DRIs without the addition of a supplemental food.

If a Title VI grantee wants to provide a canned supplemental product, it may do so. However, cans of supplemental food products alone do not constitute a meal and cannot be counted as such for the PPR or NSIP.

AoA recommends that the Title VI grantee develop policies and procedures to address this concern.

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Q. Does the Older Americans Act (OAA) require Title VI Nutrition Programs to meet nutrient requirements for meals? and Can these requirements be waived due to Tribal Sovereignty?

A. The OAA requires the Title VI Nutrition Program to meet nutrient requirements. Title VI requires that provided services are substantially in compliance with the provisions of part C of title III. As part of receiving the Title VI grant, the grantee is required to meet the requirements of the OAA.

Q. Does the OAA require Title VI Nutrition Programs to serve milk?

A. No, the OAA does not require a Title VI Nutrition Program to serve milk, but it does require that it meet the calcium and vitamin D requirements. Serving vitamin D fortified milk is often the easiest way. If elders are not drinking milk, sources of calcium can be served in other ways such as pudding for dessert, cheese or yogurt, almonds as part of a salad or dessert, fortified juices, fortified soy beverages, spinach and kale or other greens (although these must be served in very large amounts to meet the nutrient requirement).

In writing a menu, the menu pattern will allow for a milk or milk alternate. Appendix 11 page 108 (https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf) of the DGAs lists the calcium content of various foods.

Title VI Nutrition Programs may also allow elders to take the milk home to use on cereal in the morning or in coffee or tea.

Q. Does the OAA forbid salt shakers on tables at meal sites or including salt with the home-delivered meal?

A. No, but the OAA requires that meals served meet the requirements of the DGAs and DRIs. Of more concern is the sodium content of prepared and convenience foods or salt added during food preparation.

Q. Can a Title VI Nutrition Program offer program participants a menu choice between one menu that is healthy and meets the OAA requirements and another menu that does not meet the requirements allowing the Title VI Nutrition Program letting the elder decide whether they want a healthy meal or not and that is their own business?

A. No. If the Title VI Nutrition Program wants the meal funded through the Title VI grant, both meals are required to meet the OAA nutrition requirements. According to Sections 339 and 614, all meals provided with Title III, VI and NSIP funds are required to meet the requirements of the DGAs and DRIs. The OAA does not provide the AoA with the authority to waive the nutrition requirements.

Serving meals that are unhealthy, defeats the purpose of the Title VI Nutrition Program which is to help keep elders healthy.

If the Title VI Nutrition Program wants to provide elders with “unhealthy” meals or meals that do not meet the OAA requirements, they may do so with other funding. The Title VI Nutrition Program must ensure that neither Title VI nor NSIP funds were used to support these other meals.

Menu Patterns

Q. Does the OAA require a menu pattern be used?

A. The OAA does not require a specific meal pattern be used. However, using a menu pattern helps organize the meal, ensure that the meal meets the DGAs and the DRIs, is appealing, meets food safety and sanitation guidelines and is cost effective given the available food, staff, and kitchen equipment

Q. What menu pattern(s) are recommended?

A. There are various evidence-based meal patterns to use as a guide. The most commonly used pattern (based on the DGAs) is the Healthy U.S.-Style Eating Pattern found in Appendix 3 of the DGAs. Other patterns include the Health Mediterranean-Style Eating Pattern (Appendix 3 of DGAs), Healthy Vegetarian Eating Pattern (Appendix 3 of DGAs) and the DASH (Dietary Approaches to Stop Hypertension) Diet (<http://www.nhlbi.nih.gov/health/health-topics/topics/dash>).

The menu pattern used in this manual is based on the Healthy U.S.-Style Eating Pattern. If a Title VI Nutrition Program receives Title III funding, the program will use a pattern required by the state.

Q. What menu pattern is most commonly used?

A. The most commonly used pattern (based on the DGAs) is the Healthy U.S.-Style Eating Pattern found in Appendix 3 of the DGAs. The menu pattern used in this manual is based on this pattern.

Q. How does the menu pattern account for different ways of eating in Indian Country?

A. The menu pattern can be adapted for traditional and cultural foods from Indian country in the same way that the pattern is adapted to meet the needs of other different ethnic groups. The United States continues to evolve as a nation of individuals and families from around the world. Individuals maintain of their own attitudes, values, customs, beliefs, and behaviors and adapt some of the new culture and its dietary habits. It is a challenge to re-establish traditional food ways that may have been lost through acculturation.

Individuals and communities are encouraged to retain the healthy aspects of their eating and physical activity patterns and avoid adopting behaviors that are less healthy. Title VI Nutrition Programs can help individuals or communities by recognizing their own cultural diversity and developing programs and materials that are responsive and appropriate to their belief systems, lifestyles and practices, traditions, and other needs.

Q. Does the Title VI Nutrition Program must provide foods in all the food groups in the menu pattern?

A. Yes. The menu pattern is designed to meet the nutrition requirements of the OAA. A Title VI Nutrition Program cannot simply serve a hamburger and a cup of coffee. It must serve a complete meal.

Menu Planning

Q. Does the Nutrition Program need to employ a registered dietitian (RD) or registered dietitian nutritionist (RDN) to approve menus?

A. Yes. The Title VI Nutrition Program needs to employ a RD or RDN or an individual of comparable expertise. An individual of comparable expertise is defined as a credentialed nutrition professional who has the education and training substantially equivalent to the education and training of a RD. Neither a social worker nor a nurse is not a credentialed nutrition professional.

A RD or RDN has the credentials to know the nutritional needs of older adults, familiarity with the DGAs and DRIs, public health code regarding food safety and sanitation, as well as menu planning.

Q. Is the Title VI Nutrition Program allowed to pay for coffee or tea?

A. Yes. Coffee and tea (black, green, herbal) are a common part of meals in many cultures. Various herbal teas (nettle, mint, etc.) are part of a traditional diets. These hot beverages have social, cultural, and nutritional benefits.

Most commercial coffee and tea contain caffeine. Most herbal teas do not. The DGAs indicate that caffeine is not a nutrient, but a dietary component that functions in the body as a stimulant. Caffeine occurs naturally in plants (e.g., coffee beans, tea leaves, cocoa beans, kola nuts). Most caffeine intake in the United States comes from coffee, tea, and soda. Caffeinated beverages (coffee, tea, soda) vary widely in their caffeine content depending on how the beverage is brewed or manufactured. Decaffeinated coffee, tea, and soda is widely available. Available evidence indicates that moderate coffee consumption can be incorporated into healthy eating patterns and is not associated with an increased risk for chronic disease such as cardiovascular disease in healthy adults. However, individuals who do not routinely consume caffeinated beverages are not encouraged to begin consuming them.

Q: Is the Title VI program allowed to serve “cultural” or “regional” food favorites such as fry bread, menudo, wild rice?

A. Yes. The OAA in Sections 339, 601 and 614 as well as the AoA encourages the provision of meals that are appealing to elders, that meet their special needs and that include the use of traditional foods. Neither the OAA nor AoA specify the number of times per week or month that specific foods or meals may be served.

However, meals are to continue to meet both the DGAs and the DRIs. To meet these requirements, some higher fat or sodium meals may need to be limited to a specific number of times per month or to celebrations.

If the Title VI Nutrition Program uses nutrient analysis software, it may choose to average specific nutrients over a week's time.

AoA recommends that the Title VI grantee develop policies and procedures to address this concern.

Q. Can meals served during an emergency/disaster be funded by the OAA and counted towards NSIP?

A. Yes. Meals served funded by the OAA, served during a disaster, and provided to eligible elders who are provided with the opportunity to contribute to the cost of the meal may be counted for NSIP on the PPR.

Q. Do meals served during an emergency/disaster have to meet the nutrient requirements of the OAA?

A. Yes and no. Meals are to meet the nutrition requirements as much as possible, mostly by following a menu pattern. Some shelf-stable food items are high in sodium and would not meet the sodium requirements and would not be usually served daily. However, these are the foods that may be available in an emergency/disaster situation.

Q. Is the Title VI Nutrition Program allowed to serve dessert every day?

A. Dessert is allowable to help satisfy nutrient and caloric requirements and to appeal to elders. Using fruit as often as possible and limiting concentrated sweets helps individuals improve their diets and manage their diabetes and heart disease. The fruit, grains and dairy products used in dessert can count toward the fruit, grain and dairy requirements. For example, when the dessert contains ½ cup of fruit, it can count toward the fruit serving, or if the dessert such as pudding contains ½ cup of milk, it counts as ½ serving of milk.

If a program serves dessert, serve nutrient-rich desserts such as those containing milk such as pudding or fruit such as a berry crisp. Avoid serving too many desserts that consist primarily of added sugars and fats, such as pie, cake, etc.

Q. Is it allowable for a Title VI Nutrition Program to produce extra food so that the program can provide take-out or carry-out meals as a second meal for congregate participants?

A. As stated in Section 1, the Title VI Nutrition Program is not a “take-out” or “carry-out” meal program. It is not allowable for the grantee to produce extra food so that program participants can take a second meal home for the evening meal.

However, if a grantee wants to establish a “carry-out” or “take-out” meals program, a Title VI Nutrition Program may establish this using no Title VI funds, but only Tribal or other funding. These meals are not eligible for NSIP funding.

Q. Are food donations allowable?

A. Food donations are acceptable if they are safe and wholesome and can be prepared appropriately for human consumption. The primary issue regarding donated foods is food safety because elders are highly susceptible to foodborne illness. Tribes cannot buy traditional foods unless they are processed by a commercial entity.

Q. What foods can the Title VI Nutrition Program accept from non-traditional foods donations?

A. The Title VI Nutrition Program can accept donated foods from community or tribal gardens. They can also accept other kinds of non-potentially hazardous foods that do not require refrigeration such as whole fresh fruit and vegetables; commercial (Tribal or otherwise) based goods, commercial (tribal or otherwise) dried goods such as flour, sugar, corn meal;

commercially prepared (Tribal or otherwise) canned products that are unopened and in good condition. The Title VI Nutrition Program may accept potentially hazardous, commercially processed foods that have been produced in an inspected facility.

The Title VI Nutrition Program **cannot accept** foods from home gardens or non-commercial facilities; home-canned or home-processed products; home-baked goods; potentially hazardous foods prepared in a private home; unpasteurized dairy products; commercially processed food, cans, etc. without a label or expiration date; spoiled food, swollen or rusty cans, or contaminated food.

Some Title VI Nutrition Programs may receive surplus or donated foods from the USDA. However, this may not always be the case; the United States Department of Agriculture (USDA) considers the acceptance of voluntary contributions at meal sites as the equivalent of charging for meals, so that USDA may not always allow donated USDA commodities to be used in the Title VI Nutrition Program. This exclusion is different than using part of the Title VI Nutrition Program's NSIP funding to purchase commodities.

Q. What service alternates choices can we provide?

A. Service alternatives to provide:

- Soup, sandwich and salad bars
- Food or menu item choices
- Restaurant voucher programs