Introductions

Shelly Zylstra

Cooking in Shelly’s Backyard

Jean Lloyd
OVERVIEW OF THE OLDER AMERICANS ACT NUTRITION PROGRAM REQUIREMENTS
Title VI

- In order to get a grant for Title VI services (also known as Part A) Tribes must submit an application.
- Tribes are required to have at least 50 elders aged 60 and up = grant eligibility.

- Tribes may determine the age of participation:
  - Title III = over age 60
  - Title VI = Tribe determined, even as low as age 45+

- American Indians who are not enrolled in your Tribe are eligible to participate in your program:
  - The Title VI Sections specify that the program is for American Indians, Alaska Natives and Native Hawaiians, not enrolled Tribal members.
  - Some of your enrolled Tribal elders may be served in other communities where they live.
Jean Asks

An Indian elder who is not a member of your tribe, lives in your area, and is homebound, can this person get a HDM?
Title VI Rules

• If you read the OAA, you won’t find much under Title VI

• Programs are designed to follow the OAA Title III Programs and tribes will find most of the rules in that section of the OAA

• If you can, ask you local Title III state or AAA for copies of their standards and policy manuals, the rules are the same for both programs.
  – Good way to get to know them!!

• Look at the manual on line at https://olderindians.acl.gov/
Jean Asks

What are the rules if my program gets Title III and Title VI?
Title VI and Title III Requirements

- If your Tribe receives only Title VI funds, you are required to meet the requirements of Title VI.
- If your Tribe receives Title III funds from your State Unit on Aging (SUA), you need to meet the Title VI requirements PLUS the programmatic, fiscal and menu requirements of the State.
- If your Tribe receives Title III funds, the SUA may tell you:
  - What to spend Title III funds on, such as Congregate or Home-delivered meals, or transportation, chore, etc.
  - Who to serve with the Title III funds such as non-Indians who come to the Title VI site and expect service.
Part A/B Grants

Nutrition Services

• If someone else is providing the service, you don’t have to if your elders use it.

• Nutrition Services:
  – Congregate meals are required
  – Home delivered meals are required
  – Nutrition education/counseling to be provided, as appropriate

• Have a system to keep good track of who you serve and the number of meals served
Part A/B Grants - Other Permitted Nutrition/Heath-Related Services

- Diet counseling
- Sponsorship of Farmers Market programs
- Distribution centers for comods
- Blood Sugar checks
- Diabetes education
- Foot Care
- Blood Pressure Checks
- Evidence-based health programs
- Falls avoidance education
- Medication management
- Traditional foods activities
- Other traditional activities
- Support groups
- Socialization activities
- Exercise Classes
Title VI Congregate Meals
Sections 339, 601, 602, 614

Eligibility

- Elder, Tribally determined age
- Spouse, regardless of age & ethnicity
- Dependent adult children with disabilities who live with the elder or accompany them to the meal site
Title VI Congregate Meals
Sections 339, 601, 602, 614

Eligibility

• Volunteers of any age
• Individuals who are disabled and reside in a building primarily occupied by elders where congregate meals are served
• Caregivers if Title VI C funds are available and there is a policy and procedure for this use
Jean Asks

The congregate site produces about 30 congregate meals per day. About 10 people stay for lunch, the rest pick up their meals as a take-out meal? Is this permissible?
Why Emphasize Congregate?

- Socialization is important
- Gatekeeping is important
- Nutrition education is important
- Activities are important
- Lunch is an important contact point for elders

If an elder isn’t eligible for home-delivered meals, they should not get one. They should be encouraged to come to lunch!
Today’s Program: Congregate

- Most Congregate Meals at Senior or Community Centers
- Self-produced in the center’s kitchen
- May use restaurant vouchers
- School catering
- Simple meals that meet nutrition requirements
- Often with activities or Nutrition Education
Title VI Home Delivered Meals
Sections 336, 601, 602, 614

Eligibility

• Elder, Tribally determined age, determined to be homebound, frail, isolated
  • Frail= inability to perform 2 activities of daily living (ADLs)
• Spouses, regardless of age & ethnicity
• Dependent children with disabilities who live with the elder
• Caregivers if Title VI C funds are available and there is a policy and procedure for this use
Today's Program: Home Delivered

- Home Delivered Meals take all forms
  - Hot Daily
  - Hot and Frozen every other day
  - All Frozen
  - Shelf Stable (for emergencies)

- Include annual assessment including functional assessment & nutritional well-being
Is Home-Delivered Just the Meal?

- The hot meal is important and...
- It improves health
- It provides a safety check
- It helps keep elders at home
- Provides social contact
- And helps them be a part of the community

Home-Delivered Meals are for elders who are isolated, homebound, frail
An elder usually drives to the congregate site but in the winter, the roads are hazardous in this rural area, is she eligible for a HDM?
Funding for Congregate and Home-Delivered Meals

- Federal Title VI A funds, limited Title VI Part C
- Federal Nutrition Services Incentive Program (NSIP)
- Tribal funds
- State Title III funds
- State funds
- Elders’ contributions/donations
- Fund-raisers, private donations, etc.
- Title VI and NSIP funding levels is found at https://www.acl.gov/node/124
Are there Special rules for NSIP funds? (Section 311)

- NSIP funds may only be used to purchase food that is grown or processed in the US and is used to produce meals for the Title VI program.
- NSIP funds may not be used for administration, indirect, labor, or other costs
- Meals reported on the PPR receive NSIP funding and have to comply with all the Title VI rules
Are there Special rules for NSIP funds? (Section 311)

• Meals to be reported on the PPR whether funded by Title VI or not:
  • Eligible participants
  • Volunteers
  • Staff over the Tribally determined age that receive a meal

• Meals that are not to be reported on the PPR:
  • People who are not eligible for service, such as guests, other Tribal members
  • Staff who are not eligible for service
Jean Asks

Instead of using the NSIP funding in the meal program, can we use it to buy bags of groceries for the elders?
What do you mean there’s no such thing as a free lunch?

- Most Title VI Programs do not encourage donations from the elders
- This can be one way to help the program grow
- Elders can donate what they want to pay and still get a lunch
- Remember that the program is for the elders
- No one else should eat for a donation
- Any meal served to a guest must be paid at the full price, and the money put back into the budget.
Meals to “Visitors”

- This program is for **ELDERS**
- Sometimes family members show up at the meal site
- If you feed non-elders, they must pay the full cost of the meal or you pay from Tribal funds or another funding source
- Feeding non-elders at the meal sites is **STEALING FROM THE ELDERS** and violates the terms of the grant
How can contributions be used?

Section 315

• Participant contributions are to be used for the service for which the funds were contributed

• If a participant contribution is provided for meals, the contribution is required to be used to support/expand meals. The contribution cannot be used to fund a trip to the casino or other things
Does the nutrition program have to serve anyone who comes for a meal?

- Title VI funds services for individuals who are eligible under Title VI
- Title VI funds cannot be used to provide services to ineligible individuals
- If your nutrition program is serving individuals who are not eligible under Title VI with Title VI funds, the program may have audit exceptions which would mean paying back funding
Does the nutrition program have to serve anyone who comes for a meal?

• If your SUA provides Title III funds, these funds can be used to provide services to:
  • Indians
  • Non-Indian, Title III older adults (age 60 and over) who might want to attend your site
• Your Tribal funds may be used as the Tribe decides
• Your program needs to develop Policies and Procedures to address these issues
• Consult with your fiscal office in developing these to ensure that they are clear, especially to auditors
Jean Asks

Am I, an old white woman eligible for a meal at your nutrition program? Do you have to serve me?
Volunteers and Staff

• If you have enough food,
  • meal program volunteers of any age can eat meals
  • you can count them in your meal counts for Nutrition Services Incentive Program (NSIP)

• All of these meals count for NSIP along with elders meals.

• Under 60 Guest meals DO NOT COUNT for NSIP

• Don’t forget to include special dinners….birthday’s, celebrations, Elder Honor Day—just make sure the meal meets the requirements for the Older Americans Act.
Staff Meals

• If a meal is part of the staff benefits, the staff may eat

• Under Title VI, staff may not pay the suggested contribution unless the staff are elders

• Under Title VI, staff meals may not be reported on the PPR unless the staff are elders
Can a 35 year old disabled American Indian veteran come to the meal site and get a meal?
Jean Asks

How does your program figure out the amount to ask for a suggested contribution/donation?
Jean Asks

The Tribal Chair sends his assistant to the meal site for his meal, a guest of the Tribal Chair and the assistant’s meal. The Tribal Chair expects that you should just send the meals. Usually this happens at least 4 times a week. How do you pay for these meals?
Older Americans Act Nutrition Requirements
Sections 339, 601, 602, 614

• Meals are to meet:
  • 2015-2020 Dietary Guidelines for Americans
  • Dietary Reference Intakes
  • Food Safety Code
  • Appealing to program participants
  • If practical, meet special dietary needs
Other Nutrition Services

• The OAA Titles III and VI require programs to provide meals of conventional foods (meat/poultry/fish, vegetables, fruit, grains, dairy) not supplements or vitamin/mineral tablets
  • A program may choose to provide nutrition supplements, but these do not count as meals and cannot be reported for NSIP funding
  • A program may not used Title VI funding to purchase vitamin/mineral tablets for program participants
Other Nutrition Services

- The OAA does not provide for the provision of grocery bags of food to count as meals
  - Grocery delivery may be provided as a service, but Title VI cannot pay for the groceries
  - The nutrition program can provide referral and help people access USDA programs that fund other programs to provide groceries such as
    - Supplemental Nutrition Assistance Program (SNAP), formerly food stamps
    - Food Distribution Program on Indian Reservations (FDPIR) – commodity foods
    - Commodity Supplemental Food Program (CSFP) - bags of groceries
    - The Emergency Food Assistance Program (TEFAP) – food boxes, food banks
Meal service Frequency
Sections 331, 336, 601, 602, 614

• Both Titles III and VI require meals to be served 5 days per week, but there are exceptions

• When a Tribe applies for funding, the application indicates the services to be provided and how often, if meals are to be served less than 5 days per week, the application explains why
Jean Asks

The Tribe usually provides significant funding and we got cut this year. We can’t serve meals 5 days a week. What can we do?
Meal service Frequency

- Although meals are usually provided 5 days a week, a Tribe may indicate that it wants to provide meals less often.
- If after the application is approved, the Tribe wants to decrease the number of days per week that it provides meals, the Tribe needs to:
  - notify the ACL regional office, stating that it plans to decrease the number of days per week
  - the reason for the decrease
  - ACL has to approve the modification
Your Nutrition Program is Just the Beginning

- More than meatloaf…
- Checking in with elders
- Referral to services
- Activities
- Health Education
- Clinic Connection
- Exercise
- Cultural Activities
Questions?

Please take time to introduce yourself!
Thank you!