Title III-C Nutrition Program Review

- Authorized under the Older Americans Act Section 311 & 330-339.
- Title III-C includes both III-C1 Congregate Meal and Title III-C2 Home Delivered Meals programs.
- The program purpose is to reduce hunger and food insecurity while promoting socialization and the health and well-being of older individuals.
- Both programs are intended to improve the dietary intakes of participants and to offer participants opportunities to form new friendships and create informal support networks. A balanced meal and social contact together provide a positive motivation for self-care for seniors who often eat poorly on their own and can become lonely and depressed in isolation.
- Title III-C programs are non-means tested and should be treated as such.
- Target populations for the Title III-C programs include:
  - Individuals at or below 100% of the federal poverty level;
  - Individuals at high nutrition risk;
  - Individuals who live alone; and
  - Individuals who are of a minority population.

Eligibility

**Title III-C1 Congregate meals eligibility includes:**
- Age 60 and older and their self-declared spouse of any age;
- Disabled person under age 60 who reside with adults over 60 years of age. The disabled person must accompany the eligible older eligible participant to the site;
- Disabled person under age 60 who reside in a housing facility occupied primarily by adults over age 60 and at which congregate nutrition services are provided;
- Volunteers under 60 years of age who provide meal-related volunteer service; and
- Staff members of the nutrition program age 60 year and older.

**Title III-C2 Home Delivered Meals eligibility includes:**
- Age 60 and older who are homebound or geographically isolated;
- Disabled person under age 60 who resides with eligible participants; and
- Spouses of home delivered participants.
Services Offered

Meals

- At least one hot or other appropriate meal must be provided five (5) days or more a week. A written request waiver for any nutrition project which proposes in the funding request application to provide less than five (5) meals per week must be submitted to the Aging Division.
- Menus are prepared or approved prior to meal service by a Registered Dietitian (RD) or individual with comparable expertise.
- Approved menus are posted at the nutrition site (Title III-C1 Congregate Meals).
- The nutrient analysis of each meal shall be made available for those that request the information.
- Meals served must contain at least one-third (33.33%) of the current daily recommended dietary allowances and must comply with the most recent Dietary Guidelines for Americans.

Nutrition Counseling

- Nutrition counseling shall be offered by nutrition programs.
- If nutrition counseling is provided, it shall be delivered by a RD.
- Reporting of nutrition counseling: one unit = one session per participant.

Nutrition Education

- Nutrition education is required to be provided to both Title III-C1 and Title III-C2 eligible participants.
- Nutrition education is provided at least once per quarter by a RD or an individual with comparable expertise.
- A nutrition education presentation shall be provided at least one time each federal fiscal year (FFY) at each congregate meal site.
- Topics should be based on the needs of the eligible participants.
- Reporting of nutrition education: one unit = one session per participant.

Nutrition Screening

- The nutrition program provides nutrition screening through the Aging Division approved evaluation tool to eligible participants. The nutrition risk assessment should be completed at the time of intake and an annual update.
- Each service provider should develop appropriate policies or procedures for review of the nutrition screening checklist and for making appropriate referral for participants scoring a high nutrition risk.
- Eligible participants requesting a re-assessment of their nutritional score shall be provided this service.
Nutrition Services Incentive Program (NSIP)

- OAA Section 311. (a)- The purpose of this section is to provide incentives to encourage and reward effective performance by States and tribal organizations in the efficient delivery of nutritious meals to older individuals.
- NSIP awards shall be used to purchase **domestically produced food**. This is defined as: food grown in states/territories/tribes or food products processed/produced in states/territories/tribes.
- NSIP awards shall be used to expand meals, expand access to meals, or maintain the number of meals with increases in food costs.
- The Administration for Community Living (ACL) shall distribute NSIP funds through the state to the service providers based on the state’s determined formula. NSIP awards are based on the number of eligible meals served in the previous year in relationship to the total number of meals served by all Title III-C programs. Service providers shall receive NSIP funds based on the prior FFY report of meal counts.
- A meal reported for NSIP is to be served to individuals who meet the service criteria in the OAA (non-means tested for participation and being provided the opportunity to voluntarily contribute to the cost of service) and meets the OAA nutrient requirements.
- Total NSIP funds received may not equal the amount estimated in the grant application. There is no contracted amount for NSIP funding.

Key Policies

Voluntary Contributions

- **What is a voluntary contribution?** A way for recipients of Title III services to choose whether or not to share in the cost of services by making voluntary contributions of **any amount**.
- All eligible participants shall be given the opportunity to voluntarily contribute to the cost of the services received. Each service provider shall ensure that minimum standards and procedures are established for the responsible collection, handling, and safeguarding of consumer contributions and non-eligible recipient fees.
- The service provider shall not means test for any service for which voluntary contributions are accepted. Service may not be denied to an eligible participant due to the participant’s reluctance or inability to contribute toward the cost of the service. Target individuals in the OAA may receive priority, regardless of the eligible participant’s ability to pay.
- Voluntary contributions are used to expand the service for which the contributions were given and are to supplement not supplant current funds. Contributions must be used to expand the service for which the contributions were given.
(contributions for C1 should be used for C1, contributions for C2 should be used for C2).

- The division will monitor and approve voluntary contribution solicitation practice and materials upon development, implementation, and during the service provider evaluation process.
- Service providers shall develop and submit their internal policy for voluntary contribution solicitation methods with the supplemental information required with the grant applications annually. For additional information, refer to the ‘Voluntary Contribution Internal Policy Information’ document.

**Guest Fees**

- Fees amounting to the full cost of the service are charged to non-eligible recipients. Guest fees are required. They are not voluntary or confidential.
- If the nutrition program has local funding available to offer discounted meals to guests, including staff or other individuals, they may do so as long as the full guest fee amount is covered by the nutrition program.
- Guest fee amounts shall not be less than the suggested donation (contribution).
- Meals programs shall complete the “Standardized Cost Sheet for Nutrition Programs” annually. This tool will determine the total meal cost and guest fee to be charged to non-eligible individuals.
- Meal sites must notify the Division when the guest fee amount has changed at a site and rationale behind the change.

**Volunteers**

- Nutrition programs have the option of offering a meal on a voluntary contribution basis to non-elderly individuals who provide volunteer services to the nutrition program during meal hours. These individuals shall complete the ‘Volunteer Services Information Form’ or a volunteer form provided by the nutrition program.
- A written policy and procedure shall be developed and implemented which describes how and when (such as hours and duties) non-elderly volunteers are eligible to receive meals on a contribution basis, including details on record-keeping methods.
- Nutrition programs shall have an internal policy regarding monitoring and recording of volunteer hour tracking for in-kind values.

**Registered Dietitians**

- All Registered Dietitians practicing in Wyoming must be licensed with the Wyoming Dietetics Licensing Board. All facilities utilizing the expertise of a Registered Dietitian must have a letter of agreement (contract) including contract term, compensation, and required services to be provided.
Unregistered Eligible Participants

- Eligible participants who refuse to sign the release of the Division approved evaluation tool but give confirmation (either verbally or written) of their birth date will be treated as an eligible participant. They do not have to pay the cost of the full meal and should not be coerced in any way.
  - To seek reimbursement for these eligible participants, meal sites must keep a tracking log of dates and services provided to the eligible participant.
- Eligible participants who refuse to give their birth date information (either verbally or written) will be treated as a guest and must pay the full guest fee for the meal. These participants can NOT be denied service but they are not eligible for reimbursement.

Leftovers

- Eligible participants may take home their uneaten food which becomes leftovers in take-out containers. Nutrition programs may choose to allow eligible participants to take their leftovers. Each eligible participant that chooses to take their leftovers home shall be advised that they are taking them at their own risk.
- Nutrition programs shall have a sign posted at each meal site advising the eligible participants that they are taking leftovers at their own risk. Nutrition programs shall have labels available and be offered for eligible participants to put on the leftover containers.

Temporary Delivered Meals

- An eligible participant may receive temporary delivered congregate meals for no more than two weeks. If the eligible participant is in need of temporary delivered congregate meals for a longer period of time they should be referred to the home delivered program.
- The following situations may warrant a temporarily delivered congregate meal:
  - The eligible participant is temporarily ill and is unable to attend the regular congregate meal program; or
  - The eligible participant is unable to get to their regular congregate site on a particular day.
- Only volunteers for the nutrition programs shall deliver the meals.
- Nutrition programs shall advise the eligible participants of food safety guidelines of the meal and that they are accepting the meal at their own risk.
- All temporarily delivered meals that are provided shall be recorded in the Division approved data system as congregate meals linked to the participant.
Emergency (Shelf Stable) Meals

- **Title III-C1**
  - Eligible participants attending the congregate meal sites shall be advised and informed to keep a three-day supply of nonperishable foods and bottled water in case of inclement weather or other emergency that causes a temporary suspension of services. If feasible, emergency meal packages may be provided at the discretion of the meal site.
  - Meal sites may count an emergency meal package as an eligible reimbursable meal, so long as the meal package complies with OAA meal requirements.

- **Title III-C2**
  - All nutrition programs shall offer all home delivered meal eligible participants a shelf stable emergency meal package, available for use during inclement weather or other emergency situations, when the program is unable to deliver meals.
  - Emergency meal packages for home delivered meal participants shall be offered to eligible participants at least each FFY. Distribution times may vary by region based upon local needs.
  - The package should consist of two to three days of shelf stable foods and shall be replenished by the nutrition program. The daily supplies should correspond to the number of meals the nutrition program is providing (i.e. if the nutrition program provides lunch and dinner each day, a one-day supply of food would need to include two meals).
  - Meal sites may count an emergency meal package as an eligible reimbursable meal, so long as the meal package complies with OAA meal requirements.
  - Meals shall be counted and entered in SAMS under ‘Emergency Meals’ sub-service.
Grants and Funding

General Information
- Title III-C Programs receive both federal and state funding.
- The FFY calendar is used for reporting, contracting, and payment purposes (October 1- September 30).
- Contract amounts for federal and state funding are based on the prior closed FFY meal count numbers (i.e. FFY17 funding amounts are based on FFY15 meal count numbers).
- Reimbursement from both federal and state funding changes each year with varying total funding amounts.
- Meal sites will only be reimbursed for services provided up to the full contract amount. For example, if total meals served in a FFY is equivalent to a total reimbursement amount higher than the contract amount, the contract amount is the cap for reimbursement allowable to be paid.
- Payment is based on monthly expenditures up to the allowable reimbursement amount based on meals served.

Program Income
- Program income is defined as the funds that are received from clients for the services they are receiving.
- These funds must be expended first to supplement the program.
- Examples:
  - Suggested contributions from eligible participants.
  - Designated donations.

Match Requirements
- Match means the portion of project costs not paid by federal funds.
- Non-federal match requirement for each Title III-C program is 15%.
  - The state is required to provide 5% match.
  - Providers are required to provide remaining 10% match.
- Minimum total match requirements are listed in the contract for each FFY.
- Examples:
  - WSSB can be counted toward local match requirement.
  - City or local funding sources can be counted toward local match requirement.
  - Any type of federal funding (CSGB) cannot be counted toward local match requirement.
**Program Reporting**

**Monthly Reimbursement**
- Submitted monthly on the 15th.
- Reimbursement for the prior month’s services.
- Must include SAMS monthly meal counts and the profit and loss statement for the corresponding month.
- See detailed instructions in provider monthly invoice document.

**Quarterly Financial Reports**
- Submitted quarterly (January 15, April 15, July 15, and October 15).
- Summary of 3 months expenditures; must match profit and loss statement.
- Document will be sent to facility directors at the beginning of each FFY.

**Meal Cost Reports**
- Required annually.
- Used to develop guest fees and suggested contribution amounts.

**Satisfaction Survey**
- Required annually.
- Provider shall conduct a satisfaction survey to formally evaluate participant satisfaction.
- Template with minimum required questions developed by Nutrition Program Manager; can be modified as needed by meal sites.