

Department of Health and Human Services  
**ADMINISTRATION ON AGING  
AND  
OFFICE OF  
INSPECTOR GENERAL**

**STATE IMPLEMENTATION OF THE  
NUTRITION REQUIREMENTS OF THE  
OLDER AMERICANS ACT**



APRIL 1993

## ADMINISTRATION ON AGING

The Administration on Aging (AoA) is the principal Federal agency designed to carry out the provisions of the Older Americans Act (OAA). It advises the Secretary of Health and Human Services and other Federal agencies on the characteristics, circumstances and needs of older individuals. Further, it develops policies, plans, and programs designed to promote their welfare.

AoA administers three grant programs under the Older Americans Act. The largest program - Title III of the Act -- consist of formula grants to States to establish State and community-based programs for older individuals with the purpose of preventing the premature institutionalization of older individuals. The second program -- Title VI -- consists of discretionary grants with the same purpose as Title III, but to meet the unique needs of older Native Americans. The third program -- Title IV -- is also discretionary. Its purpose is to fund research, demonstration, and training activities to elicit knowledge and techniques to improve the circumstances of older Americans. (The 1992 Amendments to the OAA created a fourth program -- Title VII -- which provides funds for State activities to protect the rights of vulnerable older people. Prior to the 1992 Amendments, Title III of the OAA provided the funds for these activities.)

## OFFICE OF INSPECTOR GENERAL

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health and Human Services' (HHS) programs as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by three OIG operating components: the Office of Audit Services, the Office of Investigations, and the Office of Evaluation and Inspections. The OIG also informs the Secretary of HHS of program and management problems and recommends courses to correct them.

The OIG's Office of Evaluation and Inspections (OEI) conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The findings and recommendations contained in these inspection reports generate rapid, accurate, and up-to-date information on the efficiency, vulnerability, and effectiveness of departmental programs.

## THIS REPORT

This report is the result of a joint effort between AoA and OIG/OEI to assess the implementation of Title III of the Older Americans Act. OIG staff in the New York and Dallas regional offices provided technical support to the joint project. AoA staff in New York and Dallas directed the project with all regional offices participating in the development of instruments and data collection.

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# EXECUTIVE SUMMARY

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## PURPOSE

To review State Units' on Aging (SUA) implementation of the nutrition requirements of Title III of the Older Americans Act (OAA).

## BACKGROUND

In an effort to strengthen its stewardship of the OAA, the Commissioner of the Administration of Aging (AoA) requested technical assistance from the Office of Inspector General (OIG) in designing a review of their primary Title III grantees -- SUAs. After reviewing traditional and current stewardship activities, and discussing potential approaches for future efforts, we agreed that a review of individual States would be instituted in such a way as to provide the Commissioner with an overview of how States are implementing key components of Title III. In order to conserve limited travel funds the reviews would be conducted on a sample of States and would focus on only five programmatic areas -- stewardship, targeting, ombudsman, nutrition, and financial management.

This report on nutrition addresses congregate and home-delivered meal programs, and related services, such as nutrition education. It focuses on issuing guidance on and monitoring implementation of the key nutrition requirements of Title III of the OAA, including the area planning process.

## METHODOLOGY

The reviews were conducted in a stratified, random sample of 20 States based upon the population of individuals over 60 years of age in each State. In the first step of the sampling process, States were divided into four strata based upon the number of older individuals in each State. In the second step, five States were selected from each stratum. This stratified, random sample permits a generalization of findings from the 20 sample States to the Nation.

## FINDINGS

### *States Address A Majority Of The Nutrition Requirements, However Eligibility And Related Services Standards Need Attention*

- About one fifth of States do not assess some of the requirement eligibility for congregate home-delivered meals
- Guidance and assessment of the use of USDA cash and commodities is often weak

*States Seek To Control Nutrition Program Costs*

- Most established cost factors (i.e., cost of raw food, supplies, labor/personnel, transportation, etc.) for meals
- Many States report cost saving initiatives

*States Use A Variety Of Methods And Staff To Assess Nutrition Programs*

- Nutrition project monitoring staff vary greatly, with only 40 percent requiring registered dieticians
- About half assess area agencies annually

*States Provide Training And Technical Assistance To Address Deficiencies*

- 85 percent of States provide training and technical assistance to area agencies
- 60 percent establish training standards

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# INTRODUCTION

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## PURPOSE

To review State Units' on Aging (SUA) implementation of the nutrition requirements of Title III of the Older Americans Act (OAA). In this report, the term "nutrition" refers to congregate and home-delivered meal programs, and related services, such as nutrition education. It focuses on issuing guidance on and monitoring implementation of the key nutrition requirements of Title III of the OAA, including the area planning process.

## BACKGROUND

Under the OAA, the Administration on Aging (AoA) serves as the principal Federal advocate for older individuals, providing national leadership in the development of programs to address their needs. Through Title III of OAA (Grants for State and Community Programs on Aging), AoA encourages and assists SUAs and area agencies on aging (AAAs) to implement a system of coordinated community-based services to prevent the premature institutionalization of older individuals by allowing them to remain in their own community.

Under Title III, AoA distributes approximately \$765 million in formula grants to States based on the age 60+ population within each State. The SUAs use about 5 percent of the grant on administration, and then fund AAAs who then contract for the supportive services, nutrition services and multipurpose senior centers. The single largest component of Title III, the nutrition program, provides approximately \$450 million for congregate and home-delivered meals. Other key program components include supportive services (i.e., access services, in-home services and legal assistance) and the Ombudsman program which serves as an advocate for residents in long term care facilities.

One of AoA's major administrative responsibilities is to provide stewardship over the States' implementation of the Title III program. However, AoA's capacity to carry out its stewardship responsibilities declined substantially during the 1980's due to a significant reduction in resources. More specifically, AoA sustained a 47 percent reduction in staff and 75 percent reduction in travel funds. Each regional office had only \$2,000 annually for travel. Because they could not monitor SUAs', AoA became further and further removed from the activities of the SUAs and their area agencies on aging.

In an effort to strengthen its stewardship of the OAA, the Commissioner of AoA requested technical assistance from the Office of Inspector General (OIG) in designing a review of their primary Title III grantees -- SUAs. In response to the Commissioner's request, OIG staff met with key AoA headquarters and regional staff to identify traditional and current stewardship activities, and to discuss potential approaches for future efforts. As a result, we agreed that the review of individual States would be instituted in such a way as to provide the Commissioner with an overview of how States are implementing key components of Title III. The OIG agreed to assist AoA in

developing national, standardized review instruments for key components of Title III and in writing a report summarizing States' implementation of the Act. We also agreed that in order to conserve limited travel funds the reviews would be conducted on a sample of States and would focus on only five programmatic areas -- stewardship, targeting, ombudsman, nutrition, and financial management.

Designing the review began with the meeting of a review team of OIG and selected AoA regional staff. They brainstormed approaches, identified Federal reporting and operating requirements for SUAs and AAAs, and drafted instruments containing the review questions and criteria. The draft instruments were shared with AoA headquarters staff and each regional office for comments, and then revised to reflect comments.

The OIG/AoA review teams pre-tested the instruments and data collection methodology by conducting reviews for each of the five instruments in six States located in four different Federal regions. The pre-test identified that a great deal of time was lost explaining criteria (interpreting law and regulation) and searching for documentation. Accordingly, the review team modified each of the instruments and changed the data collection methodology. The most significant change to the methodology required the sharing of the review instruments with the States prior to the site visit in the belief that if States are aware of and understand the review criteria being used during the review, they will be better prepared to provide required documentation and to discuss specific issues.

## **METHODOLOGY**

The reviews were conducted in a stratified, random sample of 20 States based upon the population of individuals over 60 years of age in each State. These are the same data used to allocate Title III funds among States. In the first step of the sampling process, States were divided into four strata based upon the number of older individuals in each State. In the second step, we selected five States from each stratum. This stratified, random sample permits us to generalize findings from the 20 sample States to the Nation. Table I indicates those States selected for the review process (See Table I).

We also used sampling techniques during site visits to each State for the reviews of specific area plans and assessments. In these instances, we selected a simple, random sample of 10 AAAs prior to the visit to review on-site. For those States with less than 10 AAAs, all AAAs were included in the review.



TABLE I

SAMPLE STATES			
Stratum 1	Stratum 2	Stratum 3	Stratum 4
California Pennsylvania New York Texas Florida	Michigan Indiana Massachusetts Georgia North Carolina	Wisconsin Colorado Oklahoma Maine Oregon	New Hampshire North Dakota Nevada District of Columbia Montana

The data collection was conducted in two phases -- an AoA regional office desk review and an on-site review at the SUA. During the desk review phase, we looked at area plan guidance and program instructions, as well as the State's assessment instruments for AAAs to determine if they are consistent with Federal law and regulations. We also reviewed priority services waivers and targeted populations participation data from the State Program Report for Title III.

Following the desk review, each State was sent a proposed agenda for the site visit, a listing of the AAAs whose area plans and assessment reports will be reviewed, a copy of the nutrition review instrument (Appendix A), and the findings from the desk review to be discussed during the site visit.

The review instrument focused on the guidance SUAs issued to AAAs, on key requirements of Title III, and on the instruments and procedures they use to assess AAAs with those requirements. A review of area plans and assessment reports determine whether, and to what extent, they reflect OAA requirements. The instruments also focus on the issues of SUA operating procedures, and on training and technical assistance activities.

We entered data from the nutrition review instruments into three databases. One database contained the responses to the open- and closed-ended questions on the instrument and the other two contained the reviews of 183 area plans and assessments. The number of responses to questions vary because some questions did not apply to the four States in Stratum 4 -- NH, ND, NV, & DC -- which are single planning and service area (SPSA) States.

The percentages cited in this report are based on the responses to specific questions contained in the review instrument. The responses are weighted to reflect the sampling plan and are projected to the Nation. The precision at the 90-percent confidence intervals vary for each question from plus or minus 6 to 21 percent based upon the nature of the question (categorical or continuous) and the number of respondents to each question.

# FINDINGS

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## **STATES ADDRESS A MAJORITY OF THE NUTRITION REQUIREMENTS, HOWEVER ELIGIBILITY AND RELATED SERVICES STANDARDS NEED ATTENTION**

The single largest component of the Older Americans Act (OAA) is nutrition services. Title III-C requires States to establish and operate nutrition projects which are required to provide nutrition services to individuals age 60 and older and for selected other individuals. Congregate and home-delivered meals are the most common nutrition services provided. Title III-C provides about \$450 million annually for meals in both congregate and in-home settings. About 3.5 million individuals are served by nutrition projects annually. The OAA and related laws and regulations establish eligibility criteria and guidance for creating and operating nutrition projects.

### ***Congregate Meal Eligibility***

Virtually all States (95 percent) provide guidance to their Area Agencies on Aging (AAAs) concerning eligibility criteria for congregate meals. However, some States have no criteria to assess AAAs implementation of eligibility criteria for congregate meals. Regarding these eligibility criteria we found that:

- 1) 21 percent have no assessment criteria for ensuring that each AAA has procedures allowing the option to offer a meal to individuals providing volunteer services during the meal hours;
- 2) 20 percent have no criteria for ensuring each AAA shall establish procedures allowing the option to offer a meal to individuals with disabilities who reside at home with and accompany older eligible individuals;
- 3) although each nutrition services project may make nutrition services available to disabled individuals who have not attained 60 years of age but who reside in housing facilities occupied primarily by the elderly at which congregate nutrition services are provided, 12 percent of the States have no criteria to review this stipulation; and
- 4) 12 percent have no criteria for ensuring that nutrition services will be available to spouses of eligible individuals.

### ***Home-delivered Meal Eligibility***

States guidance on and assessment of eligibility criteria for home-delivered meals is weaker than that for congregate meals. Three requirements were missing most frequently.

- 1) 27 percent of States have not issued guidance on eligibility for home delivered meals for volunteer workers under age 60, and 36 percent do not assess the implementation of this eligibility criteria.
- 2) 18 percent of States have not issued guidance on eligibility for home-delivered meals for handicapped individuals under age 60 living with a participant, and 22 percent do not assess the implementation of this eligibility criteria.
- 3) 9 percent of States have not issued guidance on participant's spouse under 60 years of age and 12 percent do not assess the implementation of this eligibility criteria.

### *Use of the USDA Cash and Commodities Option*

Since the implementation of the OAA nutrition program, United States Department of Agriculture (USDA) legislation made available surplus commodities to expand the resources and meals available through the nutrition program. In the late 1970s, Federal legislation provided States the option of also choosing cash reimbursements in-lieu of commodities based on the number of meals served. Commodities are surplus food items sold by USDA at a discount.

Our review of nutrition programs found that 49 percent of States elect to use the USDA cash only option, while 51 percent use a combination of cash and commodities. Many reasons were given for options selected by the States. The more common reasons for using cash only were problems with the commodities. These problems included lack of variety (31 percent), storage space and costs (17 percent), and transportation costs (17 percent). The primary reason given for using the commodities option was the availability of bonus items (18 percent). Seven percent of States reported that they left the choice option up to a vote of their AAAs.

A number of AoA and USDA requirements for the use of USDA cash and commodities were frequently not addressed in guidance or assessments. We found that:

- 1) 32 percent of the States have not issued guidance saying that food service management companies receiving donated foods must have contracts with the nutrition service provider. Further, 46 percent of the States do not assess whether food service management companies receiving donated foods have such contracts;
- 2) 27 percent of States have not issued guidance on prompt reporting to USDA, and 26 percent of the States do not assess whether prompt reporting occurs;
- 3) 35 percent of States do not assess whether there are established procedures for the prompt and equitable disbursement of USDA cash received;

- 4) 30 percent of the States do not assess whether only Title III-C grantees get USDA reimbursement; and
- 5) 24 percent of the States do not assess whether records are maintained for 3 years on cash receipts and disbursements.

### *Other Nutrition Requirements of OAA*

Requirements for the collection of voluntary contributions are fully addressed by all States in their guidance to AAAs and virtually all assess their AAAs in these areas. However, 25 percent do not assess the collection of food stamps which can be used as contributions.

Health and safety requirements of the OAA are more consistently addressed and assessed by States than many other nutrition services criteria. All of the States have issued guidance to AAAs regarding both State and local licensing requirements, as well as health department inspections. Further, only 6 percent have no criteria for which to monitor AAAs for these requirements. We did find, however, that 8 percent have not issued guidance in the area of fire department inspections and 9 percent have no criteria assessing these inspections.

Almost half of the States (48 percent) do not monitor the AAAs provision of other nutrition services. This may be because such services are allowed at State option and not all States call for them. These can include nutrition education and other appropriate nutrition services for older individuals such as shopping assistance.

## **STATES SEEK TO CONTROL NUTRITION PROGRAM COSTS**

### *Congregate and Home-delivered Meal Cost*

The reported cost to provide meals varies among nutrition providers due, in large part, to the use of different factors to calculate these costs. The factors used to determine meal costs included any number of combinations of raw food, labor, transportation, supplies, rent, equipment, and other miscellaneous costs. The key issue with cost factors is which are used in what combinations to develop budgets and do planning. While most States use factors to calculate the cost to provide meals, the other States either used a set price that AAAs could allow for the cost of a meal or they did not figure these costs.

Many of the States (70 percent) have identified specific cost factors for congregate meals. They include:

- 1) raw food (52 percent of States),
- 2) supplies (46 percent),
- 3) labor/personnel (43 percent),
- 4) transportation (34 percent),

- 5) operations (30 percent),
- 6) space/rent (24 percent), and
- 7) equipment (14 percent).

Many States (65 percent) also specify cost factors for home-delivered meals that include the following factors:

- 1) raw food (48 percent of States),
- 2) supplies (46 percent),
- 3) transportation (39 percent),
- 4) labor/personnel (34 percent),
- 5) space/rent (24 percent),
- 6) operations (19 percent), and
- 7) equipment (10 percent).

In addition to reviewing cost factors, many of the States (61 percent) have reported utilizing a variety of methods to help reduce the costs of required or necessary services, to improve access to services, or to improve or increase services. Among the methods used are:

- 1) identifying non-aging sources of funds for transportation/services (20 percent);
- 2) joint consortium purchasing (17 percent),
- 3) changes in food preparation to meet ethnic, religious, or therapeutic needs (14 percent);
- 4) inter-generational programs (13 percent);
- 5) nutrition education (12 percent);
- 6) obtaining surplus or donated equipment (9 percent);
- 8) commodity usage (9 percent); and
- 9) eligibility and nutrition status screening tool (8 percent).

## **STATES USE A VARIETY OF METHODS AND STAFF TO ASSESS NUTRITION PROGRAMS**

The nutrition program is a multi-faceted food service program requiring a number of professional skills. In order to appropriately assess the efficacy and quality of the delivery of these services, individuals trained in food service, nutrition, and dietetics should provide a more thorough review of the status of such services. We found that those staff who routinely perform assessments of the nutrition program have a range of expertise and qualifications. We found that 13 percent of the States require that registered dietitians conduct the assessments. Another 26 percent specify using registered dietitians as part of an assessment team. Eighteen percent require staff with dietetic qualifications or education; 19 percent allow qualifications other than in the field of nutrition but with working experience in the nutrition program. Twenty-two percent permit the use of staff such as "field representatives, fiscal specialists and program

evaluators" (with no nutrition qualifications and expertise) to conduct the nutrition service assessments.

While most States attempt to provide guidance concerning a majority of the requirements for nutrition services as outlined in the OAA and related laws and regulations, they do not always address them through the assessment instruments or the actual assessments. In addition to the areas discussed earlier, criteria most frequently not addressed in the assessment instruments are: provision of canned, frozen or supplemental meals in the home-delivered meals program (40 percent of States); nutrition education services (25 percent); meals in weather emergency (18 percent); and provision of at least one meal, five or more days per week (12 percent).

Generally, the criteria States include in their assessment instruments concentrate on specific programmatic areas and issues. These are usually considered State priorities and what they believe are the priorities of the Administration on Aging. Additional criteria, not required by Federal law or regulation, have been developed by 79 percent of States. Of these, 57 percent include criteria for menu development, and 28 percent have specific monitoring and reporting criteria.

Ninety-eight percent of the States perform assessments of AAAs; 56 percent of these States report that they conduct them at least annually. The 44 percent who reported other than an annual assessment responded with a variety of time frames. Responses in our sample range from "we (State Agency) don't assess the area agencies, we require the AAAs to monitor the nutrition program," "the last formal assessment was done in the 1988-1990 cycle," and several States responded that they do them every 2 to 3 years. The last completed cycle of on-site assessments was completed by 37 percent of States in 1992; 42 percent in 1991; 11 percent in 1990; and by 5 percent prior to 1990.

All States have procedures to act on deficiencies identified through assessments. Sixty percent of States utilize follow-up letters or visits; 50 percent employ corrective action plans; 42 percent provide technical assistance; and 14 percent perform a subsequent evaluation.

In addition to the on-site assessments, States use a variety of activities to monitor the performance of the Title III-funded nutrition program. All of the States routinely review United States Department of Agriculture (USDA) program performance and other State reports, such as those regarding the planned number of meals to be served contrasted with the actual number of meals served. Many of the States also review USDA cash disbursements (80 percent) and commodity withdrawals (44 percent).

In reviewing the most common problems faced by the nutrition program, as identified through the assessment and monitoring processes, the States have identified the following:

- 1) inadequate staff (49 percent), (i.e., numbers of and qualified personnel with dietetic/nutrition educational background and experience);

- 2) lack of resources (35 percent), (e.g., funding and equipment);
- 3) sanitation problems (31 percent);
- 4) meals-related issues (14 percent), (e.g., menu development, vendors, purchasing, waiting lists); and
- 5) inadequate provider assessments (6 percent) (i.e., documentation and follow up of AAA's assessment and monitoring of nutrition service providers).

In further examining the problem of inadequate numbers of qualified staff, we noted that 73 percent of States report having hiring standards for the staffing of the Title III funded nutrition programs. These standards range from general guidelines for "adequate and qualified staff" to requirements outlining specific staff positions, training requirements (e.g., 15 hours in food protection), and minimum hours of employment (e.g., full time director, 8 hours per month for a registered dietitian).

Although there are standards for the staffing of the program with qualified individuals, almost half of the States report this as a problem. Several of our States in the sample commented on this concern. One State reported on the difficulties in hiring and keeping qualified staff due to low salaries. Another State reported the dilemma where whenever there is a cut in budgets, the "registered dietitian" position is usually the first eliminated. Another State recommended the need for AoA to address this concern in policy or regulations by outlining stronger staffing standards/requirements; since the lack of enforcement power makes it difficult for the network to justify and maintain adequate and qualified positions in the nutrition program.

#### **STATES PROVIDE TRAINING AND TECHNICAL ASSISTANCE TO ADDRESS DEFICIENCIES**

Eighty-five percent of States report that they provide technical assistance or training to address deficiencies identified in AAA assessments. They usually provide the training on a regular basis to nutrition staff or as needed to others, such as managers. A common example of the latter is new manager training or site manager training. When training for nutrition staff occurs, it is often done at regularly scheduled (e.g., quarterly) meetings.

The technical assistance provided by SUAs to their AAAs covers a broad range of areas and topics. Some deal directly with meal related issues such temperature control, sanitary standards, menus, and the efficient delivery of meals. Other commonly mentioned topics include nutrition education, meal-related services, and managing commodities. A significant proportion of nutrition training and technical assistance addresses administrative concerns, such as, cost controls, client screening and tracking, targeting, and reporting.

We also found that many States (59 percent) have established standards for the training of Title III-funded nutrition program staff. Among these States, 78 percent specify the training topics for staff functions, 17 percent specify the frequency of training, and 25 percent identify the specific training sponsors or agencies.

## APPENDIX A

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### Review Instrument For Nutrition



# NUTRITION COMPLIANCE REVIEW

**Department of Health and Human Services  
Administration on Aging**

State \_\_\_\_\_ Date \_\_\_\_\_

Primary Respondent \_\_\_\_\_ Telephone \_\_\_\_\_

Review Team Leader \_\_\_\_\_ Telephone \_\_\_\_\_

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1. *Prior to the on-site visit, obtain copies of policies, procedures, and other guidance to Area Agencies on Aging (AAAs) on nutrition services from the State Agency on Aging (State Agency). Review and determine whether or not these issuances address the criteria identified in the following table. Indicate your responses with an X in the appropriate column reflecting these codes:*

*Y (Yes) = Total Compliance with Criteria*  
*P (Partial) = Partial Compliance with Criteria*  
*N (No) = Not in Compliance with Criteria*

*During the desk review, if the policy materials do not include those items necessary to make a determination of compliance (Y, P, or N), mark NA (Not Available) in the Comments section of the table.*

	CRITERIA	Y	P	N	COMMENTS
a.	1. <b>Eligibility for Congregate Meals</b> 60+ OAA 307(a)(13)(A)				
b.	Handicapped (<60) living with participant OAA 307(a)(13)(I)				
c.	Handicapped (<60) living at meal site OAA 307(a)(13)(A)				
d.	Spouse (<60) of participant OAA 307(a)(13)(A)				
e.	Volunteer (<60) worker OAA 307(a)(13)(I)				
f.	2. <b>Eligibility for Home Delivered Meals</b> 60+ OAA 307(a)(13)(A)(B)				

	CRITERIA	Y	P	N	COMMENTS
g.	Handicapped (<60) living with participant OAA 307(a)(13)(I); 45 CFR 1321.17(f)(12); AoA-PI-89-02				
h.	Spouse (<60) of participant OAA 307 (a)(13)(A); 45 CFR 1321.69B				
i.	Volunteer (<60) worker OAA 307 (a)(13)(I)				
j.	I&R for other participant needs 45 CFR 1321.65(d)(f)				
k.	Provide canned, frozen, or supplemental meals OAA Part C-2, Section 336				
l.	Meals in weather emergency 45 CFR 1321.65(e)				
m.	<b>3. USDA Cash/Commodities</b> Used by Title III-C funded providers for the provision of eligible meals regardless of the funding source OAA 311(a)(1) & (2)				
n.	Cash purchases only U.S.-grown food OAA 311(b)(2)				
o.	Prompt reporting to USDA OAA 311(c)(1)(B), 311(b)(2); USDA Food Distribution Regulations, Part 250.42(C)(5)(i)				
p.	Food service management companies receiving donated foods have contract with the nutrition service provider USDA Regulations, Part 250, Subpart B(12)(c)				
q.	Only IIIC grantees get USDA reimbursement OAA 311(a)(1)				
r.	Maintain for 3 years records of cash received and distributed USDA Food Distribution Regulations, Part 250.42(c)(iii)				
s.	Establish procedures for the prompt and equitable disbursement of USDA cash received OAA 311(b)(2)				

	CRITERIA	Y	P	N	COMMENTS
t.	<b>4. Nutrition Services</b> Location of nutrition sites OAA 307(a)(13)(D)				
u.	Outreach to eligible individuals OAA 307(a)(13)(E)				
v.	Each meal provides a minimum of 1/3 RDA OAA Part C - Section 331(1)				
w.	Provide at least one meal, 5 or more days per week OAA Part C - Section 331(1)				
x.	Nutrition education services OAA Part C - Section 331(3)				
y.	Other nutrition services OAA Part C - Section 331(3)  <i>List other nutrition services in State:</i>				
z.	Special menus OAA 307(a)(12)(G)  <i>List special menus in State:</i>				
aa.	Assure competition in provider selection OAA Sec. 501(b). Comprehensive Older Americans Act Amendments of 1984; 45 CFR Part 92, 36(8) "Procurement"				
bb.	<b>5. Voluntary Contributions</b> Collect and safeguard cash OAA 307(a)(13)(C)(i)				
cc.	Collection of food stamps 45 CFR 1321.65(c)				
dd.	Confidentiality 45 CFR 1321.67(a)(2)				
ee.	<b>6. Health and Safety</b> State and local licensing requirements 45 CFR 1321.75				
ff.	Health department inspections 45 CFR 1321.75				

	CRITERIA	Y	P	N	COMMENTS
gg.	Fire department inspections 45 CFR 1321.75				

*At this point, you should have completed the in-house compliance review of the policies, procedures, and other guidance provided to AAAs on nutrition services. For each criteria 1a-1gg indicating an entry of NO, PARTIAL, or NOT AVAILABLE, list it in the first column of question 2 prior to the on-site interview. NOTE: For those items marked NA as a result of the desk review, State Agency responses may indicate converting the NA to Y, P, N, CMSL (Criteria met at State level), or NSC (State Agency does not address this applicable Federal criteria). Ask question 2 during the on-site visit following the brief explanation initiating the interview.*

2. A few weeks ago, we requested copies of the policies, procedures, and other guidance provided to the Area Agencies on Aging concerning nutrition services. These were reviewed against specific nutrition criteria contained in the Older Americans Act and the Title III regulations. During this review, we identified issuances which only partially addressed specific criteria, or we were unable to identify issuances addressing specific criteria. For these, I need to understand how the State Agency directs and guides the AAAs to ensure that nutrition services requirements are met for those criteria not addressed or partially addressed.

Criteria # with  
No, Partial, or  
Not Available entry

Agency Response

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*(If additional space is required, use the back of the previous page)*

3. Beyond that required by Federal law or regulation, what guidance have you provided to AAAs on nutrition services?

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b. \_\_\_\_\_ Don't Know *(Check if applicable)*

4. *Prior to the on-site visit, obtain a copy of the instrument used by the State Agency to assess compliance and performance of AAAs with nutrition service law and regulations. If the questions on nutrition service are part of a larger review instrument, ask the State Agency to identify or highlight those items pertaining to the review of nutrition service efforts. Have the State Agency mark the instrument(s) with the applicable criteria (e.g., a, b, c, etc.) using a provided copy of the criteria. This informational request should be included in the letter that is sent to the State Agency outlining the Compliance Review.*

*Review and determine whether or not the assessment instruments address the nutrition service criteria identified in the following table. Indicate your responses with an X in the appropriate column reflecting these codes:*

*Y (Yes) = Total Compliance with Criteria  
P (Partial) = Partial Compliance with Criteria  
N (No) = Not in Compliance with Criteria*

*During the desk review, if the assessment instrument and related materials do not include those items necessary to make a determination of compliance (Y, P, or N), mark NA (Not Available) in the Comments section of the table.*

	CRITERIA	Y	P	N	COMMENTS
a.	1. Eligibility for Congregate Meals 60+ OAA 307(a)(13)(A)				
b.	Handicapped (<60) living with participant OAA 307(a)(13)(I)				
c.	Handicapped (<60) living at meal site OAA 307(a)(13)(A)				
d.	Spouse (<60) of participant OAA 307(a)(13)(A)				
e.	Volunteer (<60) worker OAA 307(a)(13)(I)				
f.	2. Eligibility for Home Delivered Meals 60+ OAA 307(a)(13)(A)(B)				
g.	Handicapped (<60) living with participant OAA 307(a)(13)(I); 45 CFR 1321.17(f)(12); AoA-PI-89-02				
h.	Spouse (<60) of participant OAA 307 (a)(13)(A); 45 CFR 1321.69B				

	CRITERIA	Y	P	N	COMMENTS
i.	Volunteer (<60) worker OAA 307 (a)(13)(I)				
j.	I&R for other participant needs 45 CFR 1321.65(d)(f)				
k.	Provide canned, frozen, or supplemental meals OAA Part C-2. Section 336				
l.	Meals in weather emergency 45 CFR 1321.65(e)				
m.	<b>3. USDA Cash/Commodities</b> Used by Title III-C funded providers for the provision of eligible meals regardless of the funding source OAA 311(a)(1) & (2)				
n.	Cash purchases only U.S.-grown food OAA 311(b)(2)				
o.	Prompt reporting to USDA OAA 311(c)(1)(B), 311(b)(2); USDA Food Distribution Regulations, Part 250.42(C)(5)(i)				
p.	Food service management companies receiving donated foods have contract with the nutrition service provider USDA Regulations, Part 250, Subpart B(12)(c)				
q.	Only IIIC grantees get USDA reimbursement OAA 311(a)(1)				
r.	Maintain for 3 years records of cash received and distributed USDA Food Distribution Regulations, Part 250.42(c)(iii)				
s.	Establish procedures for the prompt and equitable disbursement of USDA cash received OAA 311(b)(2)				
t.	<b>4. Nutrition Services</b> Location of nutrition sites OAA 307(a)(13)(D)				
u.	Outreach to eligible individuals OAA 307(a)(13)(E)				

	CRITERIA	Y	P	N	COMMENTS
v.	Each meal provides a minimum of 1/3 RDA OAA Part C - Section 331(1)				
w.	Provide at least one meal, 5 or more days per week OAA Part C - Section 331(1)				
x.	Nutrition education services OAA Part C - Section 331(3)				
y.	Other nutrition services OAA Part C - Section 331(3)  <i>List other nutrition services in State:</i>				
z.	Special menus OAA 307(a)(12)(G)  <i>List special menus in State:</i>				
aa.	Assure competition in provider selection OAA Sec. 501(b), Comprehensive Older Americans Act Amendment of 1984; 45 CFR Part 92, 36(8) "Procurement"				
bb.	<b>5. Voluntary Contributions</b> Collect and safeguard cash OAA 307(a)(13)(C)(i)				
cc.	Collection of food stamps 45 CFR 1321.65(c)				
dd.	Confidentiality 45 CFR 1321.67(a)(2)				
ee.	<b>6. Health and Safety</b> State and local licensing requirements 45 CFR 1321.75				
ff.	Health department inspections 45 CFR 1321.75				
gg.	Fire department inspections 45 CFR 1321.75				

*For each criteria 4a-4gg indicating an entry of NO, PARTIAL, or NOT AVAILABLE, list it in*





_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

*(If additional space is required, use the back of the previous page)*

6. What criteria, not required by Federal law or regulation, has the State Agency included in its assessment instrument for nutrition programs?

a. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. \_\_\_\_\_ Don't Know (*Check if applicable*)

7. How often does the State Agency assess the Title III-funded nutrition programs?

- a. \_\_\_\_\_ Annually
- b. \_\_\_\_\_ Semi-annually
- c. \_\_\_\_\_ Quarterly
- d. \_\_\_\_\_ Monthly
- e. \_\_\_\_\_ Other (*Specify time period*) \_\_\_\_\_
- f. \_\_\_\_\_ Don't Know (*Check if applicable*)

8. What are the start and end dates for the last completed cycle of on-site assessments?

- a. Start date - \_\_\_\_\_
- b. End date - \_\_\_\_\_

9. Who routinely conducts these assessments? (*Probe: #, qualifications*)

	INDIVIDUAL/JOB TITLE	QUALIFICATIONS
a.		
b.		
c.		
d.		
e.		
f.	Don't Know ( <i>Circle if applicable</i> )	

10. What procedures are used to follow-up on identified weaknesses?

- a. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- b. \_\_\_\_\_ Don't Know (*Check if applicable*)

11. Which of the following activities does the State Agency use to monitor the Title III-funded nutrition programs? *(Read the following list and check responses.)*

- a.  Review of reports (USDA, Program Performance, or other State reports regarding the planned number of meals to be served contrasted with the number of meals actually served).
- b.  Commodity withdrawals
- c.  USDA cash disbursements
- d.  Other *(Explain)*:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e.  Don't Know *(Check if applicable)*

12. What are the most common deficiencies in the nutrition program in this State?

- a. \_\_\_\_\_  
\_\_\_\_\_
- b. \_\_\_\_\_  
\_\_\_\_\_
- c. \_\_\_\_\_  
\_\_\_\_\_
- d. \_\_\_\_\_  
\_\_\_\_\_
- e. \_\_\_\_\_  
\_\_\_\_\_
- f.  Don't Know *(Check if applicable)*

13. What technical assistance or training has the State provided to address these deficiencies?

- a. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- b.  Don't Know *(Check if applicable)*

14. Has the State agency established hiring standards for staffing Title III-funded nutrition programs?

a.  Yes, Please explain:

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b.  No

c.  Don't Know (*Check if applicable*)

15. Has the State agency established standards for the training of Title III-funded nutrition program staff?

a.  Yes, Please explain:

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b.  No

c.  Don't Know (*Check if applicable*)

16. Some of the factors that might be used in calculating the cost of meals would include: raw food, labor, space, supplies, transportation and utilities. In order to ensure a degree of uniformity in the calculation of meal costs, what cost factors does the State Agency allow when the cost of meals is being calculated?

FACTORS			
	CONGREGATE MEALS		HOME DELIVERED MEALS
a.		aa.	

b.		bb.	
c.		cc.	
d.		dd.	
e.		ee.	
f.	State Agency does not specify allowable cost factors <i>(Circle if applicable)</i>	ff.	State Agency does not specify allowable cost factors <i>(Circle if applicable)</i>
g.	Don't Know <i>(Circle if applicable)</i>	gg.	Don't Know <i>(Circle if applicable)</i>

17. Of the following, which USDA option did the State choose?

- a. \_\_\_\_\_ Cash
- b. \_\_\_\_\_ Commodities
- c. \_\_\_\_\_ Cash and Commodities
- d. \_\_\_\_\_ Don't Know *(Check if applicable)*

18. Why was this option chosen?

a. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- b. \_\_\_\_\_ Don't Know *(Check if applicable)*

19. Does the State have any innovative programs that reduce costs, improve access, or improve/increase services?

a. \_\_\_\_\_ Yes, Please explain:

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b. \_\_\_\_\_ No

c. \_\_\_\_\_ Don't Know (Check if applicable)

20. *The preselected sample of 10 Area Agencies on Aging were identified prior to the on-site visit. This sample is to be used throughout the compliance review process for all five areas, the first compliance review being Stewardship.*

*For the sample AAAs, obtain the most currently completed annual cycle of State Agency assessment instruments and corresponding assessment reports (if any). Review the assessment findings and determine the extent to which each of the sample AAAs were in compliance with each of the criteria identified in Attachment A. Record your responses on the following table using these codes:*

*Y (Yes) = Total Compliance with Criteria*  
*P (Partial) = Partial Compliance with Criteria*  
*N (No) = Not in Compliance with Criteria*  
*NSC = No State Criteria (State Agency does not assess this Federal criteria - identified through in-house review of State Agency's assessment tool and related materials)*  
*CMSL = Criteria met at State level*  
*O = Other Finding (provide explanation and indicate by report number and criteria number in the Comments section following the table)*

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
Criteria										
a.										
b.										
c.										
d.										
e.										
f.										
g.										
h.										
i.										
j.										
k.										
l.										
m.										
n.										
o.										



AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
p.										
q.										
r.										
s.										
t.										
u.										
v.										
w.										
x.										
y.										
z.										
aa.										
bb.										
cc.										
dd.										

<b>AAA Name</b>										
<b>Sample Number</b>	1	2	3	4	5	6	7	8	9	10
ee.										
ff.										
gg.										

COMMENTS:

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*[INTERVIEW COMPLETED]*