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PROGRAM MEMO

TO: AREA AGENCY ON AGING DIRECTORS	NO.: PM 09-13(P)
SUBJECT: American Recovery and Reinvestment Act (ARRA) Preliminary Data Reporting Guidance for Nutrition Stimulus Funds	DATE ISSUED: June 24, 2009
REVISED	EXPIRES: September 30, 2010
REFERENCES:	SUPERSEDES:
PROGRAMS AFFECTED: <input type="checkbox"/> All <input type="checkbox"/> Title III-B <input checked="" type="checkbox"/> Title III-C1/C2 <input type="checkbox"/> Title III-D <input type="checkbox"/> Title III-E <input type="checkbox"/> Title V <input type="checkbox"/> CBSP <input type="checkbox"/> MSSP <input type="checkbox"/> Title VII <input type="checkbox"/> ADHC <input type="checkbox"/> Other: _____	
REASON FOR PROGRAM MEMO: <input type="checkbox"/> Change in Law or Regulation <input type="checkbox"/> Response to Inquiry <input checked="" type="checkbox"/> Other Specify: <u>Data reporting guidance for ARRA.</u>	
INQUIRIES SHOULD BE DIRECTED TO: Assigned AAA-Based Team Public Health Nutrition Consultant	

This Program Memo (PM) provides preliminary guidance about the data reporting requirements related to Nutrition Stimulus funds awarded through the American Recovery and Reinvestment Act of 2009 (ARRA). The California Department of Aging (CDA) is providing this PM to summarize the information we have received to date in order to help Area Agencies on Aging (AAA) prepare to meet forthcoming federal reporting requirements. Please be advised that any of this information may change after CDA has had an opportunity to analyze the Office of Management and Budget (OMB) formal guidance issued June 22, 2009. AAAs will be apprised of any updates to official Nutrition Stimulus funds data reporting requirements as they become available.

Nutrition Stimulus Data Reporting Systems

At this time, guidance provided by the Administration on Aging (AoA) and OMB has suggested reporting will be through two systems: 1) the current AoA National Aging Program Information System (NAPIS), with modification to one of the State Program Performance Reports (SPR), and 2) the ARRA central government-wide internet portal. AoA expects the State Units on Aging (SUAs) to report only stimulus meals, clients and expenditures on a quarterly basis beginning October 10, 2009, and CDA is contemplating collecting this information from AAAs

via a spreadsheet so that no changes will be needed to California Aging Reporting System (CARS).

CDA is committed to making Stimulus data collection and reporting as simple as possible. However, depending upon final requirements and individual data collection capabilities, providers, AAAs and the State may need to track and manually report additional information including Stimulus meal, client and other data. For example, CDA may ask AAAs to complete a quarterly survey instrument to collect and compile statewide information for OMB reporting purposes. This survey information may include OMB-required items such as “number of jobs created,” “number of jobs retained,” etc. The OMB notice includes data elements that the CARS does not collect, as well as some that will need further clarification from OMB/AoA and may not apply to Nutrition funding. CDA does not plan to collect the detailed information requested down to the provider level, although it is not entirely clear what OMB intends.

Whichever methods are used, AAAs will not be required to purchase new software. Once federal reporting requirements have been clarified, CDA will issue additional technical assistance to AAAs.

Nutrition Stimulus Data Report Timing

The AoA and OMB guidance requires quarterly Nutrition Stimulus data reports to be submitted ten days after the close of each quarter. Because of the short timeframes, CDA is seeking to report California nutrition data on a partial quarter basis with a full reconciliation by the end of the funding period.

OMB Stimulus Data Reporting Elements

As referenced above, the OMB has issued implementing guidance for data reporting under Section 1512 of the American Recovery and Reinvestment Act of 2009, Public Law 111-5.

Anticipated Nutrition Stimulus Data Reporting Definitions

The following are anticipated Nutrition Stimulus Data Reporting definitions:

Number of Nutrition Stimulus Congregate Meals means a meal provided with Nutrition Stimulus funds to a qualified individual in a congregate or group setting.

Number of Nutrition Stimulus Home-delivered Meals means a meal provided with Nutrition Stimulus funds to a qualified individual in his/her place of residence.

Number of Nutrition Stimulus Persons Served means unduplicated persons served with Nutrition Stimulus funds.

Number of Nutrition Stimulus Jobs Created means those new positions created and filled, or previously existing unfilled positions that are filled, as a result of Nutrition Stimulus funding. This includes any new or now filled position paid for from any funding source.

Number of Nutrition Stimulus Jobs Retained means those previously existing filled positions that are retained as a result of Nutrition Stimulus funding. This includes any new or now filled position paid for from any funding source.

Allowable Nutrition Stimulus Expenditures

The purpose of the Nutrition Stimulus funds is to provide meals to seniors in need of food, restore nutrition services that have been cut, and reinstate positions that may have been eliminated or reduced. Further, CDA guidance is that AAAs give priority to increasing or at least maintaining the number of congregate and home-delivered meals (HDM) provided to older adults. The following are allowable expenditures using Nutrition Stimulus funds:

- restore meals, services and jobs;
- backfill the loss of other city, county and State funds used for nutrition services;
- mitigate nutrition waiting lists, and
- purchase equipment for nutrition services.
 - If equipment is purchased keep detailed expenditure records.
 - Per AoA guidance, if equipment is needed to maintain and provide more meals, AAAs are strongly encouraged to make such purchases from their regular FY 2009 OAA appropriations.
- The ARRA included \$46M to the Office of Inspector General (OIG) to monitor and evaluate the implementation of the ARRA. There will be stringent tracking of these funds for reasonable costs, transparency, and accountability to the OIG. While ARRA Nutrition Stimulus funds do not prohibit the use of the award for infrastructure investments made by local governments, there will be enhanced tracking conditions. Recipients of Nutrition Stimulus funds will bear the responsibility for documenting reasonableness of costs, transparency, and accountability to the OIG.

Expending Nutrition Stimulus Funds

Nutrition Stimulus funds must be spent by September 30, 2010. *The CDA will expect AAAs to be able to report how Nutrition Stimulus funds are expended separate from OAA nutrition funds.* **Following are strategies that may be used to estimate and account for these funds separately:**

Example 1: Expend all Nutrition Stimulus funds first prior to expending any Title III C Older American Act (OAA) funds and report the corresponding data and dollars spent.

This approach allows the funds to be used quickly within the community and may avoid the AAA having to separately track Stimulus expenses, meal or client data manually.

Example 2: Expend Nutrition Stimulus funds throughout the grant period ending September 30, 2010 calculating Stimulus expenditures, service units and clients by applying an allocation percentage.

- Creating a Nutrition Stimulus allocation percentage allows service providers to determine the amount of Nutrition Stimulus funds used and calculate the number of Nutrition Stimulus meals and persons served. Once chosen, this method must be used consistently throughout the grant period. However, the percentage will need to be adjusted in the last quarter that your AAA reports Nutrition Stimulus expenditures to reflect any contract allocation changes during the year.
- How to determine the Nutrition Stimulus allocation percentage:
 - **Step 1:** Begin by adding your Nutrition Stimulus contract amount and OAA contract amounts together for the fiscal year reported to equal your “total allocation”.
 - **Step 2:** Divide your Nutrition Stimulus contract amount by the total allocation. This will provide you with a Nutrition Stimulus allocation percentage.
- How to calculate the number of Nutrition Stimulus meals, clients and costs for each period:
 - **Meals:** Multiply total meals for the period by the Nutrition Stimulus allocation percentage to determine the Nutrition Stimulus meal count.
 - **Clients:** Multiply the total number of clients for the period by the Nutrition Stimulus allocation percentage.
 - **Costs:** Multiply total meal costs for the period by the Nutrition Stimulus allocation percentage to determine the Nutrition Stimulus meal costs for the period.

Sample Calculations:

Step 1:

Older American Act contract amount	= \$	75,000
Nutrition Stimulus contract amount	= \$	25,000
Total allocation	=	\$100, 000

Step 2:

$\$25,000/\$100,000 = 25\%$	Nutrition Stimulus allocation percentage
$\$75,000/\$100,000 = 75\%$	Older American Act allocation percentage

Meals:

Meal Count for 1st quarter = 4,000 Total Meals
4,000 X .25 = 1,000 Nutrition Stimulus meal count
4,000 X .75 = 3,000 Older American Act meal count

Costs:

Meal Cost for 1st quarter = \$10,000
\$10,000 x .25 = \$2,500 Nutrition Stimulus meal costs for the period

- All Nutrition Stimulus funds must be expended by September 30, 2010. Any unexpended funds must be returned to CDA.

Example 3: Designate a nutrition provider(s) or site(s) as Nutrition Stimulus.

- By designating a nutrition provider(s) or site(s) as the sole recipient(s) of Nutrition Stimulus funds you can easily track and expend all Nutrition Stimulus funds. Plan to resume OAA funding once all Nutrition Stimulus funds have been expended.

Example 4: Any other reasonable methodology as approved by CDA.



Lynn Daucher
Director