



Administration on Aging: Nutrition Services for Native Americans

A. Funding Table

(Dollars in Millions)

Program/ Project/Activity	Total Appropriated	FY 2009 Actual Obligations	FY 2010 Estimated Obligations
Nutrition Services for Native Americans	\$3.0	\$3.0	\$0.0
Total	\$3.0	\$3.0	\$0.0

B. Objectives

The American Recovery and Reinvestment Act (Recovery Act) provides \$3 million for Nutrition Services for Native Americans. Established in 1978 under the Older Americans Act (OAA), this program provides congregate and home-delivered meals and related nutrition services to American Indian, Alaskan Native and Native Hawaiian elders.

In line with the HHS Strategic Objective “Address the Needs, Strengths, and Abilities of Vulnerable Populations,” these programs are responsive to the cultural diversity of American Indian, Alaskan Native, and Native Hawaiian communities and represent an important part of the communities’ comprehensive services. Performance data indicate that these nutrition services are an efficient means to help Native American elders remain independent and in their own homes.

Nutrition services for Native Americans are faced with the dual challenge of rising food and other costs in addition to an increased demand for services because of the growing population of older Native Americans. The economic downturn has forced many Tribal senior programs to scale back or eliminate nutrition services and staff. Funding provided under the Recovery Act will help Tribal programs to offset these cutbacks and contribute to the provision of nearly 400,000 meals to more than 2,300 vulnerable Native American seniors and their caregivers.

C. Activities

Funds augment existing resources, replace revenue lost from local sources due to the economic downturn, and support the continued delivery of meals to vulnerable Native Americans. In addition to meals, services include nutrition screening and education and nutrition assessment and counseling as appropriate. Home-delivered meals also represent an essential service for many caregivers by helping them to maintain their own health and well-being.



D. Characteristics

AoA distributed \$3 million in Nutrition Services for Native Americans funding under the Recovery Act to the 244 Tribal organizations and two Native Hawaiian organizations currently funded under the OAA. Formula allocations are based on the population of elders aged 60 and older within each Tribal service area. Tribal organizations directly provide, or arrange for, congregate and home delivered meals and related nutrition services. Tribes may decide the age at which a member is considered an elder and thus eligible for services. No Recovery Act funding will be used to pay for AoA administrative costs associated with this program.

E. Delivery Schedule

On April 2, 2009, AoA distributed \$3 million in Nutrition Services for Native Americans funding under the Recovery Act to 244 Tribal organizations and two Native Hawaiian organizations under a formula based on each Tribal organization's share of the elderly. On March 18, 2009, AoA posted to its website Frequently-Asked Questions about the implementation of the Recovery Act, and on April 28, 2009 the agency hosted a plenary session on the topic at the Title VI National Training and Technical Assistance Forum. Tribal organizations directly provide, or arrange for, congregate and home delivered meals and related nutrition services. AoA will comply with the requirements under the Recovery Act legislation and OMB Guidance concerning monitoring and reporting.

F. Environmental Review Compliance

This program has undergone NEPA review and a Categorical Exclusions (CE) has determined to be the appropriate level of NEPA review.

G. Measures

Table 1: Data-Gathering Schedule

Measure	Type	FY 2009 Target	FY 2010 Target	FY 2010 +/- FY 2009
Home-Delivered Nutrition meals.	Output	Quarterly	Quarterly	Quarterly
Congregate Nutrition meals.	Output	Quarterly	Quarterly	Quarterly
For Title VI Services, increase the number of units of services provided to native Americans per thousand dollars of AoA funding.	Outcome	Annually	Annually	Annually

Table 2: Data Source and Validation

Measure	Data Source	Data Validation
Home-Delivered Nutrition meals (Output)	State and Tribal Program Report data is annually submitted.	The web-based submissions include multiple data checks for consistency. Multi-year comparison reports are reviewed by AoA and state staff. AoA staff follow-up with states to assure validity and accuracy. After revisions, states certify the accuracy of their data.



Department of Health and Human Services
 American Recovery and Reinvestment Act
Children and Community Services



Measure	Data Source	Data Validation
Congregate Nutrition meals (Output)	State and Tribal Program Report data is annually submitted.	The web-based submissions include multiple data checks for consistency. Multi-year comparison reports are reviewed by AoA and state staff. AoA staff follow-up with states to assure validity and accuracy. After revisions, states certify the accuracy of their data.
For Title VI Services, increase the number of units of service provided to Native Americans per thousand dollars of AoA funding. (Outcome)	Title VI Reporting System, Budget amounts as appears in the Congressional Justification.	Annual reports submitted by grantees, reviewed by AoA staff who follow-up with questions. Tribal officials certify report is accurate. AoA staff review record keeping system during regular on-site monitoring.

To minimize the reporting burden on Tribes, AoA tracks performance under the Recovery Act using two existing measures. These include the outcome measure “increase the number of units of service provided to Native Americans per thousand dollars of AoA funding” and output measure “the number of meals provided.”

The outcome measure “increase the number of units of service provided to Native Americans per thousand dollars of AoA funding” demonstrates the efficiency of AoA in providing services to Native Americans. Program efficiency is a necessary and important measure of the performance of AoA programs. OAA intends Federal funds to act as a catalyst in generating capacity for these program activities at the Tribal level. It is the expectation of the OAA that Tribal organizations increasingly improve their capacity to serve Native American elders efficiently and effectively with both Federal and Tribal funds.

Outcome Measure

The most recent year for which this outcome data is available is FY 2007. In that year AoA’s target for this measure was 264 units of service provided per thousand dollars of OAA funding, which was exceeded with an actual rate of 312 units per thousand dollars of funding. AoA develops its targets based on trends rather than a single data point. Given that the actual FY 2005 measure was 254 and the one in FY 2006 was 281, AoA increased the target in FY 2008 to 273. AoA also selected this target to take into account the rising costs faced by Native American nutrition programs. AoA will increase the FY 2009 target to 277 because of the additional Recovery Act appropriations and an increase in AoA’s FY 2009 budget for the Native American Nutrition & Supportive Services program. AoA will work to develop targets based strictly on the Recovery Act funding. AoA will report this data annually and will make the results public via press releases and at <http://www.recovery.gov> and <http://www.aoa.gov>.

Output Measures

This outcome measure is supported by the corresponding OAA output measure “the number of meals provided.” The most recent year for which this output data is available is FY 2007. In that year Tribal organizations provided 4.37 million meals,



270,000 more than the target. In FY 2008 AoA decreased the target to 4.05 million meals to take into account the rising costs faced by Native American nutrition programs. In FY 2009 AoA anticipates serving 4.37 million meals given Recovery Act funding and the increase in AoA's FY 2009 budget for the Native American Nutrition & Supportive Services program.

Outcome / Achievement	Type	12/31/09	3/31/10	6/30/10	9/30/10	12/31/10	3/31/11	Program End
Home-Delivered Nutrition meals	TARGET	200,000	325,000	452,563	678,844	678,844	678,844	678,844
	ACTUAL	113,871	125,270					
Congregate Nutrition meals	TARGET	125,000	200,000	254,566	381,849	381,849	381,849	381,849
	ACTUAL	72,596	100,226					

H. Monitoring and Evaluation

All Recovery Act programs are assessed for risk and to ensure the appropriate internal controls are in place throughout the entire funding cycle. These assessments are conducted by operating components to comply with the statutory requirements of the Federal Managers' Financial Integrity Act and the Improper Payments Information Act, as well as OMB's Circular A-123 "Managements' Responsibility for Internal Control" (including Appendices A, B, and C).

AoA's risk management process fits within the overall governance structure established at HHS to address Recovery Act program risks. The HHS Risk Management and Financial Oversight Board provides executive leadership and establishes accountability for the risk assessment process related to internal controls over financial reporting, and the HHS Senior Assessment Team ensures that risk assessment objectives are clearly communicated throughout the Department. AoA's Senior Assessment Team carries out comprehensive annual assessments of its Recovery Act programs to identify risks and develop strategies to address them, including those associated with selecting recipients, awarding and overseeing funds, and achieving program goals. It meets quarterly to monitor and assess the effectiveness of mitigation strategies and identify emerging risks.

In addition, AoA has presented its high level risks to the Recovery Act Implementation Team. Chaired by the Deputy Secretary and comprised of senior policy officials from throughout the Department, the Implementation Team convenes monthly to monitor progress in carrying out Recovery Act programs and address the obstacles and risks that could impact on their success.



Nutrition Services for Native Americans is a long-established program with a proven track record of delivering results. Internal control assessments conducted under the Federal Managers Financial Integrity Act have consistently found AoA grants programs (including Nutrition Services for Native Americans) to be low risk and to have a sound internal control structure. Financial statement and other programmatic audits have not identified any significant deficiencies in OAA nutrition programs and there are no uncorrected weaknesses or deficiencies associated with these activities. Primary recipients are Tribal governments that have their own established control structures and Tribal audits of these programs under Office of Management and Budget Circular A-133 have not generated significant systemic findings. In addition, risk assessments conducted specifically for the Recovery Act found that these activities are generally low risk and that appropriate mitigation strategies have been put in place.

Nutrition Services for Native Americans also has an established system for collecting and validating financial data and program data on both outputs, such as numbers of meals and individuals served. Existing AoA performance measures of efficiency and targeting, as well as the ongoing measurement of program outputs, are applicable to Recovery Act funding activities as described above.

To ensure that recipients understand and can meet the objectives, outcomes and accountability expectations associated with the provision of Recovery Act funds to OAA nutrition programs, AoA provides additional technical assistance to Tribal organizations, along with enhanced monitoring and reporting as required under the Act. On March 18, 2009, AoA posted to its website Frequently-Asked Questions about the implementation of the Recovery Act, and on April 28, 2009 the agency hosted a plenary session on the topic at the Title VI National Training and Technical Assistance Forum. AoA also utilizes existing technical assistance mechanisms, such as such as Native American Resource Centers and training and technical assistance contracts, to support the efforts of Tribal organizations and ensure full program compliance for Recovery Act funding. AoA will not use Recovery Act funds to provide technical assistance under these existing mechanisms.

I. Transparency

AoA is open and transparent in all grant activities that involve spending of Recovery Act funding consistent with statutory and OMB guidance. AoA ensures that recipient reports required by Section 1512 of the Recovery Act are submitted and reviewed for material omissions and significant errors that would mislead or confuse the public. AoA informs recipients of their reporting obligations through standard terms and conditions, grant announcements, contract solicitations, and other program guidance. In addition, AoA provides key award information to recipients and other technical assistance to grantees and fully utilizes Project Officers to ensure compliance with reporting requirements

AoA collects OAA performance outcome data via the web-based State Program Report. AoA Headquarters and Regional Office staff check the data for consistency



and follow-up with the states to assure validity and accuracy. State performance data is available via the Aging Integrated Database (AGID), AoA's online data query system, at www.data.aoa.gov.

AoA's data community website also helps to ensure that recipients meet Recovery Act reporting requirements. The website includes resources and documentation related to the Recovery Act and a listserv with 120 performance specialists who will be responsible for collecting and reporting Recovery Act data for their states. AoA uses this website to offer technical assistance, promote information sharing, and provide reminders regarding data requirements. AoA utilizes the technical assistance methods described above to ensure that recipients understand and comply with the statutory, OMB, and HHS reporting requirements.

J. Accountability

To ensure that managers are held to high standards of accountability in achieving program goals under the Recovery Act, AoA has built upon and strengthened existing processes. Senior AoA officials meet regularly with senior Department officials to ensure that projects are meeting their program goals, assessing and mitigating risks, ensuring transparency, and incorporating corrective actions. The personnel performance appraisal system also incorporates Recovery Act program stewardship responsibilities for program and business function managers.

AoA performance plans for both Senior Executives and managers align individual and organizational performance with results-oriented goals that are linked to the HHS and AoA Strategic Plans. These goals, which include objectives related to effective program management and proper stewardship of Federal funds, are cascaded to subordinate supervisors and staff throughout each executive's portion of the organization.

K. Barriers to Effective Implementation

Because Recovery Act funds are being used to augment existing programs that already have service delivery structures in place, there are barriers to effective implementation of these programs. Many of the Tribal and Native Hawaiian organizations that will receive a portion of the \$3 million in Recovery Act funding are in rural areas and have small numbers of staff, with more than half having one or less full time employee equivalents. Most of the Tribal and Native Hawaiian organizations will receive less than \$13,000 in Recovery Act funding. To prevent undue burden, AoA is requesting that Tribal and Native Hawaiian organizations report on the effects and use of Recovery Act funds when funding has been expended. This effort to reduce reporting burden has resulted in some challenges for monitoring the implementation of the funding. It is likely that many more meals have been served to date than have been reported because the majority of tribes still have Recovery Act funding available in their accounts and have not been required to report any outcomes to date. AoA is undertaking follow-up outreach activities with the Tribal organizations to make sure that all recipients which have expended all their funds are reporting their outcomes. To ensure that recipients understand and can meet the objectives, outcomes and accountability expectations associated with



Department of Health and Human Services
American Recovery and Reinvestment Act
Children and Community Services



the provision of Recovery Act funds to OAA nutrition programs, AoA is providing additional technical assistance to Tribal organizations.

L. Federal Infrastructure

Not applicable.

Summary of significant changes:

All of recipients of these grants receive less than \$25,000 in funding. As such, they are not required to provide AoA with any outcome measures (numbers of meals served) until all the funding is expended. We had not projected in our original implementation plans that so many of the grantees would have unexpended funds at this point in time, so fewer meals have been reported as being served than we had projected. It is likely that any more meals have been served to date than have been reported because the majority of Tribal organizations still have ARRA funding available in their accounts and haven't reported their outcomes to us yet. AoA is undertaking follow-up outreach and technical assistance with the tribes to make sure that all those which have expended all their funds have reported their outcomes.