



PROGRAM INSTRUCTION

SUA-20-PI-29
Revised

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TO: Subrecipients of the State Unit on Aging

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SUBJECT: Title III-D Health Promotion Disease Prevention Evidence-Based Programs

CONTENT: This Program Instruction (PI) supersedes previous PIs for Title III-D in accordance with federal regulations.

Effective October 1, 2016, the three tier system for Title III-D funded programs ceased at the federal level. The State Unit on Aging implemented this effective July 1, 2016, to coincide with the State fiscal year. This was communicated at the Area Plan Training in Kearney on December 7-8, 2015 through a presentation, a Service Narrative sample, and a revised Taxonomy.

Evidence-Based "Programs" and Evidence-Based "Services/Practices" are not equivalent. For example, blood pressure and glucose screenings may be considered a service or practice, however they are not a program.

Title III-D funds are only available for direct costs of Health Promotion/Disease Prevention programs that fully meets the Administration for Community Living's definition of evidence-based. Area Agencies on Aging shall ensure that programs receiving Title III-D funds meet all of the required components to satisfy the new federal definition of "Evidence-Based Programs".

To determine whether a program meets the definition of "evidence-based", consult the Administration for Community Living, National Council on Aging (NCOA), or the

Nebraska State Unit on Aging. The following ACL website also contains information about evidence based programs:

<https://acl.gov/programs/strengthening-aging-and-disability-networks/aging-and-disability-evidence-based-programs>.

Grant funds under Title III-D may only be used for expenses directly related to conducting evidence-based programs. Allocated administrative expenses are not allowable. OAA funds for Area Plan administration may only be spent from Title III Part B, C, and E (OAA Title III, Section 303(c)(1) and Section 373(g)(1)). Please see 45 CFR Part 75 — *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards* for comprehensive and detailed information.

Examples of direct costs may include: (but are not limited to) certified trainer workshops, registrations, licensures, program updates, equipment that is required for the program (mats, weights, CDs), salaries and benefits for trainers/employees for time spent only for training and instructing, travel time and expenses to and from trainings/classes, manuals for instructors, building rent for space during class only.

Indirect costs for evidence-based programs cannot be paid with Title III-D federal funds. Examples of indirect cost items that will not be permitted include: (but are not limited to) administrative salaries and benefits unrelated to III-D activities, giveaways such as towels or water bottles, office supplies purchased for the entire agency/location, food, drinks, utilities for buildings, car maintenance, and anything not directly related to the training process, client instruction, or other expenses not directly required for the evidence-based program. Program promotion, recruitment, outreach, media materials, printed materials, and advertising for classes costs are advised to be charged to Title III-B and CASA to eliminate any ties between portions of non-related Title III-D items/materials and Title III-D funding.

If you have questions, please contact Erik at 402-471-4732, Doug at 402-471-4797 or Bob at 402-471-4737 or Attn: Erik, Doug or Bob at DHHS.aging@nebraska.gov

Frequently Asked Questions

Title III-D Health Promotion Disease Prevention FAQ:

Please contact the State Unit with more questions
402-471-2307 or email the SUA at DHHS.aging@nebraska.gov

The Older Americans Act (OAA), Title III-D, provides program authorization grants to provide evidence-based health promotion disease prevention programs at multipurpose senior centers, congregate meal sites, through home delivered meal programs, or at other appropriate sites. In providing these evidence-based services, Area Agencies on Aging may use Title III-D funding to purchase items and services that are required by the program, all other expenses are indirect costs and are not allowable. See FAQ for details on allowable cost allocations.

Examples provided in this document are not exhaustive.

Examples of allowable reimbursements through Title III-D grants:

Q1: What can be reimbursed with Title III-D funding?

A: Evidence-based health promotion disease prevention programs such as Tai Chi, Stepping On, Powerful Tools for Caregivers, and programs listed on the NCOA website (<https://www.ncoa.org/resources/ebpchart/>). All materials that come with, or are required for, these programs are eligible. These may include licensures, workbooks, manuals, media items, equipment such as mats, weights, stop watches, or other required items to be purchased for the evidence-based program.

Q2: Can staff salaries be reimbursed through the Title III-D subaward? What is allowed? What portion?

A: Salaries and fringe benefits for III-D coordinators/trainers can be reimbursed for time attending train-the-trainer instruction, recertification, and providing classes. This may include travel time to and from trainings or classes. Since programs can only be led by certified trainers, whether they are employees or other trainers, this expense is only allowable for the direct time spent traveling to and from evidence-based programs. Time spent by Title III-D coordinators completing client enrollment forms, tracking attendance, and data entry are also eligible for reimbursement.

Q3: Can mileage for employees/trainers be reimbursed?

A: Yes. Mileage for employees and trainers are eligible for reimbursement for travel directly involving the Title III-D activity.

Note: All other distances traveled that are not directly to and from a trainings or classes are not eligible for reimbursement.

Q4: Are travel expenses to and from conferences or trainings eligible?

A: Yes. Travel expenses such as mileage for cars and fares for planes, trains, or public transit to and from a conference or training site only, are eligible.

Note: All other mileage related for travel to offsite events, restaurants, stores, or any other non-directly related conference or training event are not eligible.

Q5: Are expenses for conferences and trainings eligible?

A: Yes. Registration and program fees are reimbursable. Room and board for overnight travel to attend training is also reimbursable.

Note: Extra costs such as incidentals and extra services incurred through lodging and conference center services are not eligible.

Q6: What media materials are eligible?

A: Required DVD's, CD's, etc. required for the program are eligible, as well as online media materials that can be purchased or downloaded through the program.

Note: All other DVD's, CD's, music, programs, or extra multimedia sources not directly associated with the evidence-based program are not eligible.

Q7: Is rent for a space to conduct evidence-based health promotion disease prevention programming eligible?

A: Yes. Rent for the hours spent during trainings or classes only is reimbursable.

Note: Hours that are not used for trainings or classes are not eligible for Title III-D reimbursement.

Examples of unallowable expenses from the Title III-D grant:

Q1: Can the expenses of a Governing Board who oversees the operations of an agency and its programs be reimbursed through Title III-D?

A: No. Although the Board may make decisions about Title III-D programming, classes are not conducted, nor are there any other direct costs associated with the participation of the clients involved.

Q2: Are maintenance costs for staff vehicles considered eligible?

A: No. Maintenance such as: oil changes, new windshield wipers, car washes/detailing, tire rotations, shocks, struts, timing belts, flushes, upholstery treatments, purchase and replacement of fluids, or any other maintenance services are not eligible for Title III-D. Vehicle repairs from damage due to accidents or any natural occurrences are not eligible for Title III-D reimbursement.

Note: Maintenance costs are reimbursed through the Internal Revenue Service mileage rate as explained in an earlier question.

Q3: Are banking expenses for depositing suggested contributions or any other fees associated with deposits or withdrawals eligible?

A: No.

Q4: Are building utilities allowable?

A: No. Building utilities such as heating, air conditioning, water, gas, septic, electricity, Wi-Fi, internet, or maintenance services such as mowing and snow removal services are not reimbursable.

Q5: Are advertising and printed materials reimbursable with Title III-D funds?

A: No. Printed materials, outreach, radio, television, online, and social media advertising are advised to utilize Title III-B and CASA funding sources. These costs are advised to be charged to Title III-B and CASA to eliminate any ties between portions of non-related Title III-D items/materials and Title III-D funding.

Q6: What are other unallowable expenses?

A: Indirect costs that do not directly relate to the training process, client instruction, or other expenditures not related to the program. Many of these purchased items include, but are not limited to:

- Giveaway promotional items
- Towels for clients
- Water bottles
- Office supplies unrelated to a specific evidence based program
- Food or beverages not required by the program
- Fees for guest speakers unrelated to, or not required, by the program