

Frequently Asked Questions

2022 Innovations in Nutrition Programs and Services - Replication
HHS-2022-ACL-AOA-INNU-0040 UPDATED FEBRUARY 22, 2022

CORRECTION: There was an error in a link provided in the Notice of Funding Opportunity, on page 50, Additional Information section.

The correct link is: <https://acl.gov/senior-nutrition/network-experiences>

A recording of the informational call held on 2/9/2022 is available at: 866-452-2114

Replication Toolkits are located at: <https://acl.gov/senior-nutrition/replication>

Videos describing each project can be found here:

- [Replication Model A](#): Maryland Department of Aging: Addressing Malnutrition in Community Living Adults, A Toolkit for Area Agencies on Aging
- [Replication Model B](#): Iowa Department on Aging: Encore Cafe
- [Replication Model C](#): Georgia State University: Senior Nutrition Program Evidence-Based Suicide Intervention Training
- [Replication Model D](#): Erie County (New York) Department of Senior Services: Modernizing the Congregate Dining Program

Questions Related to Applicant Eligibility/Preference

1. Question: Who may apply for this Notice of Funding Opportunity (NOFO)?

Answer: Domestic public or private non-profit entities including state and local governments, Indian tribal governments and organizations (American Indian/Alaskan Native/Native American), faith-based organizations, community-based organizations, hospitals, and institutions of higher education.

2. Question: Are for-profit companies or individuals eligible to apply?

Answer: No.

3. Question: Is a non-profit eligible even if they are waiting for the IRS determination letter?

The nonprofit is incorporated and registered in the state and has the EIN from the IRS.

Answer: The applicant should meet the criteria at the time that they apply. If they've applied for, but have not received a determination letter, then they are not eligible to apply because they, don't meet all of the eligibility requirements at the time that they're applying.

4. Question: Are other federal agencies eligible to apply?

Answer: No, but any federal agencies interested in exploring partnership opportunities with ACL are encouraged to contact Judy Simon at judy.simon@acl.hhs.gov

5. Question: Are current or previous ACL INNU grantees eligible to apply?

Answer: Yes. Current or previous ACL grantees are not excluded from this NOFO but must provide a strong rationale for the need for additional funding. This includes an explanation for how this proposal significantly differs from previous projects.

6. Question: Can we apply for both 2022 INNU NOFOs (HHS-2022-ACL-AOA-INNU-0017 and HHS-2022-ACL-AOA-INNU-0040)?

Answer: Yes. Applicants that meet the eligibility requirements may apply for both INNU NOFOs, as they are competed separately.

7. Question: Does an applicant need to directly receive Title III funds?

Answer: Applicants do not need to directly receive Title III funds, however, at least one key partner providing a Letter of Commitment must receive Older Americans Act Title III funds, and the project must be replicable using Older Americans Act Title III funding.

8. Question: Is it acceptable to include coalition partners that are not within the same agency? Is it acceptable to have one agency apply and other agencies implement the grant?

- a) The Notice of Funding Opportunity (NOFO) does not specify the number or types of partnerships, except in the area of Universities and other academic/research partnerships.
- b) The NOFO does not distinguish between leadership and implementation roles. Focusing on the purpose of the funding opportunity may be helpful: “The purpose of this funding opportunity is to verify the effectiveness of SNP innovative programs or practices implemented during COVID-19 that positively impact participants.”

9. Are you interested in expanding funding to states or organizations that have never received funding from ACL (or have not been funded for a number of years)?

Answer: Preference is not given to current grantees, former grantees, or applicants who have never received funding from ACL. All applications will be reviewed and scored based on the criteria included in the NOFO.

10. Question: We currently do not have a congregate or home delivered meals provider but do provide hunger relief programs. Can we apply for this grant?

If the applicant’s agency does not receive Title IIIC funds directly, at least one of your partner organizations must be a recipient of OAA Title IIIC funds. The Letter of

Commitment section must clearly identify at least one key partner that receives OAA Title III funds.

11. Question: Where can I find lists of previous INNU grant recipients?

Answer: On ACL's website at <https://acl.gov/programs/nutrition/innovations-nutrition-programs-and-services-0>

Questions Related to Letters of Intent

12. Question: Are potential applicants required to submit a Letter of Intent?

Answer: Letters of Intent are not required but they are requested to help us in planning for the independent review process.

13. Question: Does the Letter of Intent need to state which replication model we will be doing?

Answer: The Letter of Intent is optional, so it can be worded informally. You can indicate the replication model, or you could indicate that your organization is considering multiple models at this time. You should base your final selection of one model on your community needs, resources, partners available, and so on.

14. Can you let us know who else from our state submits a Letter of Intent or application, so we are better able to collaborate with other interested parties?

Answer: This type of information is considered "pre-decisional" and cannot be released publicly.

Questions Related to Proposal Format

15. Question: Is there a maximum page limit for the Project Narrative?

Answer: Twenty pages is the maximum length allowed. The Project Workplan, Letters of Commitment, Organizational Chart, Vitae of Key Project Personnel, Budget Narrative/Justification, and references *are not counted* toward the 20-page limit as long as they are clearly labeled as Appendices.

16. Question: Should applicants submit one comprehensive budget narrative that includes all three years of the project plan?

Answer: Applicants must include a Budget Narrative/Justification for years one, two, and three along with a combined Budget Narrative/Justification for the proposed 36-

month budget period.

17. Question: Should applicants submit one comprehensive workplan that includes goals for all three years, or should proposals include a separate workplan for each of the three years?

Answer: Applicants must provide a separate work plan for each year (year one, year two, and year three). The Workplans for each year should match the separate budget plans for each year and consistent with the application's Project Narrative.

18. Question: Do we need to create partner-specific workplans for our major contributing partners?

Answer: You do not need to provide any additional Workplans for your partners. However, in each of the application's yearly Workplan, you should indicate any lead persons at the partnering agencies that are responsible for tasks included in the Workplan. Applications are reviewed to determine the extent to which the application Narrative, Workplan, and Letters of Commitment reflect a commitment from partners and description of their activities and areas of responsibility.

19. Question: Can an application have more than one Project Director?

Answer: Only one person may be designated as the ACL project director contact. However, it is understandable from a project management perspective, that you might have two co-directors based on subject matter expertise, etc.

20. Question: Can we use a font size smaller than 11 for tables included in the narrative?

Answer: No. The entirety of the Project Narrative, including tables, graphics, and headings must be double-spaced, and of a standard font size of not less than 11, preferably Times New Roman or Arial. You can use smaller font sizes to fill in the Standard Forms and Sample Formats outside of the Project Narrative sections, such as the Workplan and Budget Narrative/Justification, or in the Appendices which are submitted separately from the narrative.

21. Question: How should we list/cite references? Are references subject to the Project Narrative criteria regarding page limit and double-spacing?

Answer: There is not a particular citation style that you are required to use with respect to references. You may include your references as footnotes, endnotes, or a separate appendix (please be sure to clearly label). References may be single-spaced *if included* as a separate appendix. Appendices are not subject to the 20-page limit for the Project Narrative.

22. Question: Which elements of the application can we include as an appendix?

Answer: The Project Workplan, Letters of Commitment, Vitae of Key Project Personnel,

Budget Narrative/Justification, applicable references, and other supporting material (e.g. organization chart) should be uploaded as appendices.

Questions Related to Proposed Activities

23. What are the differences between the Replication Model projects?

Answer: First, applicants should thoroughly review HHS-2022-ACL-AOA-INNU-0040, which contains the requirements for all replication models.

Next, applicants for this NOFO must propose to implement **one of the four** Innovations in Nutrition Services and Programs Replication Model Toolkit programs listed below and located at <https://acl.gov/senior-nutrition/replication>

Videos describing each project can be found here:

- [Replication Model A](#): Maryland Department of Aging: Addressing Malnutrition in Community Living Adults, A Toolkit for Area Agencies on Aging
- [Replication Model B](#): Iowa Department on Aging: Encore Cafe
- [Replication Model C](#): Georgia State University: Senior Nutrition Program Evidence-Based Suicide Intervention Training
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24. Question: What information is contained in the Replication Model Toolkits? What should I do if I need more information?

Answer: The toolkit specifies proposed application:

- required elements,
- components which may or should be customized, and
- areas where flexible approaches are permitted.

Successful applications will outline a proposed project that includes all required elements while also demonstrating that customized and flexible items are planned. Additional resources are provided in addition to required elements.

FAQs are provided within each Replication Model Toolkit, to assist applicants who may have additional questions regarding a specific Replication Model.

Lastly, If funded, your project team will receive regular technical assistance with the National Resource Center on Nutrition and Aging, and consultation with members of the original grant's project team, as feasible.

25. Question: Is my project a good fit for the NOFO? Can I schedule a call with the ACL contact for this NOFO?

Answer: To allow for an even playing field regarding the Funding Announcements, ACL staff are not able to provide individual guidance on proposed projects. Please review the

Funding Announcement/s and FAQ document carefully and feel free to attend the applicant conference call noted within the Funding Announcement.

26. Question: The Replication Model Toolkits include grant requirements, required customization and project flexibilities. What is the difference between these categories?

Answer:

- Grant Requirements: Required components of the grant that must be included.
- Required Customization: Required components of the grant which must be customized based on applicant's unique project. (e.g. population served, geography, partnerships, etc).
- Project Flexibilities: Optional components.

27. Question: Can we propose an evaluation measure that is not included in the Replication Model Toolkit we have selected?

Answer: Yes, as long as the required evaluation measure(s) are included. It is recommended to include the validity of any additional evaluation measures which are planned, with an explanation of why they are justified.

28. Question: Is there an expectation that the grant project would be scaled/replicated during the grant period?

Answer: No, it is not expected that the grant project would be scaled/replicated during the grant period, however, scaling/replication may be included as a component of the sustainability plan.

29. Question: What if we have questions about the project after our grant is funded?

Answer: If funded, your project team will receive regular technical assistance with the National Resource Center on Nutrition and Aging, and consultation with members of the original grant's project team, as feasible. ACL project officer assistance is also provided.

30. Question: How do I know if our project approach is permitted?

Answer: In addition to reviewing HHS-2022-ACL-AOA-INNU-0040 and the respective Replication Toolkit, applicants should follow existing OAA Title III-C and State policies. OAA Title III-C policies have significant inherent flexibilities (https://acl.gov/sites/default/files/nutrition/SNP_FundingFlexibilities_2021OCT.pdf). If your grant proposal involves any programmatic, policy, organizational or financial system changes, it is the applicant's responsibility to ensure the changes are acceptable and compatible with your state/local policies and requirements.

31. Question: Can meals provided be counted in the State Performance Report (SPR)/OAAPS (Older Americans Act Performance System)?

Answer: Meals provided by discretionary grants may be reported in the State Performance Report (SPR) via OAAPS (Older Americans Act Performance System) if they meet all SPR and OAAPS [requirements and definitions](#); this includes reporting meals as NSIP congregate or NSIP home-delivered (more on NSIP https://acl.gov/sites/default/files/nutrition/NSIPGuidance_Dec2021_Final.pdf).

32. Question: How should an applicant explain how they plan to “disseminate” this project?

Answer: Examples of dissemination activities are provided in the Award Information Section where the grantee agrees participate in webinars or conference sessions and attend nutrition and/or aging conferences. Additional dissemination activities may be proposed.

33. Question: Two of the replication grants, Model Toolkit B (Iowa Dept. on Aging) and Model Toolkit D (Erie County Department of Senior Services) list nutrition education as a requirement, but the format as flexible. What types of nutrition education should be provided?

Answer: ACL defines nutrition education as: An intervention targeting OAA participants and caregivers that uses information dissemination, instruction, or training with the intent to support food, nutrition, and physical activity choices and behaviors (related to nutritional status) in order to maintain or improve health and address nutrition-related conditions. Content is consistent with the Dietary Guidelines for Americans; is accurate, culturally sensitive, regionally appropriate, and considers personal preferences; and is overseen by a registered dietitian or individual of comparable expertise as defined in the OAA. Nutrition education may be provided may be delivered in-person or via video, audio, online or the distribution of hardcopy materials.

34. If one of our key partners pulls out of the grant before it is finished, do we have to forfeit the grant?

Answer: No. Work with your ACL project officer and the Nutrition Resource Center to identify whether a replacement is needed and if so, how it may impact your project. It is important to emphasize with potential partners what their roles will be and the importance of maintaining good communication and cooperation during the grant.

35. Question: Can we propose a replication from another INNU successful grant that is not listed in the Notice of Funding Opportunity?

Answer: No, only the four grants listed are eligible for replication.

36. Question: Can we include the expansion of the program to other localities as part of the Workplan?

Answer: It is up to the applicant whether their proposed project will expand to additional localities during the grant period.

37. Question: Our project could require policy changes to Title III-C in order to scale and sustain these programs. Is ACL looking for grantees to explore possible policy changes needed as a result of these replication projects?

Answer: If your grant proposal involves any programmatic, policy, organizational or financial system changes, it is your responsibility to make sure the changes are acceptable and compatible with your state/local policies and requirements.

38. Question: Who meets the definition of older adult?

Answer: For the purpose of this FOA and consistent with the definition in the Older Americans Act (42 U.S.C. §3002(8)), we are defining an older adult as an individual who is 60 years of age or older. For tribes and tribal organizations, the age of older Indians is defined by the tribe and may vary.

39. Question: The Replication Model Toolkit indicates demographics are a required customizable component. What participant demographics are required?

Answer: Applicants should decide which demographic element(s) will be collected and included in their evaluation. Demographic elements may include (not exclusively): Age, Gender, Location (town, region), Rural/Urban, Income level, Race, Ethnicity, Live Alone.

40. Question: I have a similar program to a replication project, can I just implement my existing program?

Answer: Applications commit to implementing the respective projects in alignment with the original project and following required elements included in the Replication Model Toolkit.

41. Question: Is there a minimum number of participants served or participant outcomes measured each year?

Answer: That decision is up to the applicant agency in concert with their research partner(s). There are no minimum targets regarding the number of participants served or participant outcomes measured, but you should include the number of participants you intend to serve and the number of outcome measurements as part of your Evaluation. You should also include the rationale for how you determined your targets. Targets should be realistic and achievable. However, the grantees are required to engage approximately 25% of your target participants by the end of year one, 50% of participants by the end of year two, and 100% of the participants by the end of year three.

42. Question: The NOFO indicates we need to include a letter of support from at least one key partner that receives Title IIIC funds. How can I locate a list of Title IIIC recipients?

Answer: Title IIIC recipient organizations include State Units on Aging (SUAs), Area Agencies on Aging (AAAs) and local service providers (LSPs). To identify your state's

SUA, go to: <http://www.advancingstates.org/about-nasud/about-state-agencies/list-members>; to find your local AAA and LSP go to <https://eldercare.acl.gov/Public/Index.aspx>

43. Question: We'd like to learn more from the original Innovations in Nutrition Programs and Services grant project staff. Can we contact them or is there another way to get more information about a project?

Answer: In order to maintain an even playing field and ensure accurate and consistent information is provided, applicants are strongly discouraged from independently reaching out to the original Innovations in Nutrition Programs and Services grant project staff.

44. In addition to the aging services network, can we collaborate with organizations such as YMCAs, health care organizations, faith-based organizations, etc.?

Answer: Yes. You are free to develop/propose formal or informal partnerships with a variety of organizations (e.g., senior centers, hospitals, etc.).

45. Question: With respect to geographic coverage area, can we focus on particular regions of the state or localities that are known to have a high level of need, even if the areas are not contiguous?

Answer: A contiguous geographic area is not required, though it is important to include data-driven rationale within your application to demonstrate why you have selected certain areas of focus within your state/locality.

46. Question: Are logic models required?

Answer: Logic models are not required. The evaluation framework explanation may be through visual representation (eg, logic model) or text (eg, narrative). Applicants should independently determine their research plan components and methodology.

In addition, the application should include periodic assessment of progress toward implementing the project and outline the extent to which the evaluation will be used to improve the performance of the project through the feedback generated by its periodic assessments.

47. Question: Are there populations that should be targeted?

Answer: Yes. Target populations include, but are not limited to, individuals who are Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; and persons who live in rural areas.

The Older Americans Act requires Title IIIC senior nutrition programs to target services to underserved older adults with greatest social and economic need, to permit such individuals to remain in home and community-based settings.

For this NOFO, the at-risk population should include older adults who formerly participated in the congregate nutrition program and other community-based programs, whose activity levels, access to healthy food, as well as opportunities to connect socially with others, grocery shop, obtain medical care, and exercise may have declined or changed significantly during COVID-19. These individuals, who previously were vigorous and independent, may have experienced declines in nutritional health, food security, physical capabilities, mental health and social connection.

48. Question: Can an applicant propose to give fiscal or other types of incentives, such as small amounts of money or gifts, to recruit program participants?

Answer: We do not recommend this approach, but in limited circumstances to meet programmatic goals, an applicant may propose some kinds of incentives. Monetary incentives such as cash would not be allowable. Gift cards in very small denominations (\$5-\$10) signed for and properly accounted for can be an option. See [Use of Incentives for Older Americans Act Grantees](#) for additional guidance.

If an applicant proposes to offer incentives, every cost in the grant must meet the Federal Cost Principles, which include being reasonable, allowable and allocable. Additionally, from a programmatic perspective, grant expenditures should be developed within the context of sustainability.

49. Question: Can sites offering the programs charge participants a fee for participation?

Answer: Yes, as long as the process is in alignment with Older Americans Act reporting and implementation requirements. Specifically, cost-sharing is not permitted with Title IIIC meals. However, Title IIIC providers may establish a private-pay, fee-for-service meal program. For more information see the following resource: <https://seniornutrition.acl.gov/documents/EstablishingPrivatePayProgramTipSheet.pdf>

Charging participants a reasonable fee is also an acceptable part of a sustainability plan to offset costs. ACL considers any fees received to be program income and grantees would use those funds as they are earned to cover or further grant related activities. Grantees are expected to expend program income funds before drawing down additional Federal dollars. Any program income remaining after the grant expires will require the grantee to contact the Federal agency for disposition instructions, which is generally to return the remaining balance.

Questions Related to Grant Administration

50. Question: Can there be Co-Project Directors?

1. **Answer:** Only one person may be designated as the ACL project director contact. However, it is acceptable from a project management perspective, that you might have two co-directors based on subject matter expertise, etc.

51. Question: What is the difference between a grant and a “cooperative agreement”?

Answer: In the United States, Federal grants are financial assistance issued by the U.S. Government. A cooperative agreement is a variation of a grant, which is awarded when a grant provider anticipates having substantial involvement with the grantee during the performance of a funded project. These grants will be issued as cooperative agreements because they are significant and multifaceted endeavors in which AoA anticipates having substantial involvement with the recipients during performance of funded activities. Therefore, throughout the project period of the grant award, AoA will furnish technical assistance, oversight, and support to each grantee to help ensure program success. The cooperative agreement structure will allow AoA to provide a higher level of technical assistance, oversight, and support than a grant relationship offers. For more information, see the HHS Grants Policy Statement at <https://www.hhs.gov/sites/default/files/grants/policies-regulations/hhsgps107.pdf>.

52. Question: Is the \$50,000-150,000 funding available for each year of the grant, if awarded, or is it \$50,000-150,000 for the entire 3 year project?

Answer: Under this competition, AoA/ACL will award cooperative agreements in the amount of \$50,000-150,000 for each of the three 12-month budget periods, subject to availability of funds. Successful applicants will receive grant awards totaling up to a maximum of \$450,000 over a 3-year period.

53. Question: How do we calculate cost sharing/match requirements?

Answer: Under this cooperative agreement, ACL/AoA will fund no more than 75% of the project’s total cost, which means the applicant must cover at least 25% of the project’s total cost with non-Federal resources. In other words, for every three (3) dollars received in Federal funding, the applicant must contribute at least one (1) dollar in non-Federal resources toward the project’s total cost. A common error applicants make is to match 25% of the Federal share, rather than 25% of the project’s total cost.

There are two types of match: 1) non-Federal cash and 2) non-Federal in-kind. In general, costs borne by the applicant and cash contributions of any and all third parties involved in the project, including sub-grantees, contractors and consultants, are considered matching funds. Volunteered time and use of facilities to hold meetings or conduct project activities may be considered in-kind (third party) donations.

54. Question: Can we subcontract some or all grant activities?

Answer: Yes. Grantees, not the Federal government, must decide whether it is in their best interest to subcontract grant activities. However, it is very important that grantees realize that the administrative responsibility and oversight of all grant activities remains with the

grantee. Grantees must serve as the central, core, and active partner in the grant and not simply be a conduit for pass-through funding to sub-contractors. When subcontracting, the grantee should retain sufficient funding to adequately fulfill its administrative and oversight responsibilities. Applicants who propose to subcontract out a significant portion of their grant activities should provide a rationale in their proposal that justifies any additional overhead costs that affect the funding for programmatic activities.

55. Question: How are grantees able to access grant funds? Is payment based on cost reimbursement?

Answer: Grantees will draw down funds using the [Payment Management System](#) (PMS). Costs are not reimbursed, but rather requests are made through PMS for the release of funds.

56. What are the reporting requirement associated with this cooperative agreement?

Answer: Awardees are responsible for submitting programmatic progress reports and financial reports. Applicant Notice of Awards will provide more detailed information. All ACL grants have the same required reporting. There is no specific additional reporting required for this grant. More information can be found at: <https://acl.gov/grants/managing-grant>

Questions Related to Letters of Commitment

57. To whom should letters of commitment be addressed?

Answer: Letters of Commitment should be addressed to the applicant.

58. Question: Can a State Unit on Aging provide multiple letters of support if there is more than one applicant from the same state?

Answer: Yes. State agencies can make their own decisions regarding which/how many organizations they provide a letter of support for.

Questions Related to the Budget Narrative/Justification

59. Does the match need to be secured prior to submitting the grant application?

Applicant project requirements must be finalized by the submission deadline.

60. Is there a limit to the amount or % of budget that a partner can be paid?

Answer: A limit on budget amount or % that a Grantee could pay a consultant or contractor could be impacted if your program has a restriction on % of services that can pass through to other entities. The law limits the salary amount that may be awarded and charged to ACL grants and cooperative agreements. Award funds may not be used to pay the salary of an individual at a rate in excess of Executive Level II. The Executive Level II salary of the Federal Executive Pay

scale is \$203,700 annual.

61. Question: Should the budget include funds for traveling to meetings?

Answer: Yes. Applicants should plan and budget to send one to two representatives, once a year for the duration of the grant award, to an annual Innovations in Nutrition grantee convening as well as an aging and/or nutrition conference identified by AoA as an appropriate grantee activity. Applicants should assume a Washington, DC per diem amount. Further meeting details will be communicated upon grant award.

It is possible that the meeting will be held remotely, in which case any funds budgeted for travel could be re-allocated to a different grant-related activity that is mutually agreed upon by the grantee and the ACL project officer.

62. Question: Does the Interstate Funding Formula (IFF) need to be used if the contractors will be AAAs?

Answer: No. This grant is an ACL discretionary grant and therefore, the IFF would not apply. Only mandatory OAA grants require the IFF to be used.

63. Does the budget range for each funding option include indirect costs? What indirect rate can we use?

Answer: Any indirect costs charged by the applicant would be included in the amount of the federal award.

Indirect costs must be supported by an approved indirect cost rate agreement, which also defines the direct charges against which the rate applies. Indirect charges may only be requested if: (1) the applicant has a current indirect cost rate agreement approved by the Department of Health and Human Services (DHHS) or another Federal agency; or (2) the applicant is a state or local government agency. State governments should enter the amount of indirect costs determined in accordance with DHHS requirements. If indirect costs are to be included in the application, a copy of the approved indirect cost agreement must be included with the application. Further, if any sub-contractors or sub-grantees are requesting indirect costs, a copy of the latest approved indirect cost agreements must also be included with the application, or reference to an approved cost allocation plan.

You should consult your organization's financial representative to see if you should be charging indirect costs and if so, what the approved rate is. In the event you are looking to make an initial request, please contact the Project Officer and Grants Management Specialist associated with this NOFO.

NOTE: For indirect cost, applicants have two options: 1 – use the rate in their approved IDC agreement; or 2 – use the 10% di minimis rate, if no approved IDC agreement. If the applicant has an IDC agreement in place already, they would

use this rate in the agreement until it expires. If an applicant doesn't have an IDC agreement, they don't have to have one to claim indirect cost; but can just use the 10% di minimis rate.

64. Question: Is there a cap on the indirect costs that will be permitted? Would an indirect cost rate of 45% be permitted?

Answer: There is no set limit on the indirect costs. Indirect costs can only be charged if the organization has an approved allocation plan or an approved federal indirect cost agreement. Applicants should check with their fiscal staff for the amount that can be charged on the grant, as it is different for each organization. Also, see the HHS Grants Policy Statement at <https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>.

65. Question: If our organization does not have a negotiated indirect cost rate, are we able to include these costs in the proposed budget?

Answer: Yes, per 45 CFR § 75.414(f) Indirect (F&A) costs, “any non-Federal entity (i.e., applicant) that has never received a negotiated indirect cost rate, may charge a de minimis rate of 10% of modified total direct costs (MTDC).”

66. Question: Regarding the budget template, can you clarify the difference between non-Federal cash versus non-Federal in kind?

Answer: Applicants must indicate a match of 25% of the project's total cost. Non- Federal cash is any cash from you or your partners; it does not include funds from the Federal government. Examples of non-federal cash match includes budgetary funds provided from the applicant agency's budget for cost associated with the project. . In kind includes any third party non-cash items that are program-related such as volunteered time and meeting room space that can be used as match for this program.

67. Question: Do funds need to be evenly allocated across the three-year project period?

Answer: No, however no more than \$150,000 per year will be awarded. Funds do not need to be evenly allocated across the project period. Please be sure that your budget is aligned with your workplan with respect to project activities, outcomes, and products.

Miscellaneous Questions

68. Question: What is the make-up of the application review panels?

Answer: We recruit a variety of reviewers to participate in the review. We convene multiple panels comprised of individuals who may be former or current grantees (who are not applying for the current grant), representatives of various partnering agencies, academics, and other people with expertise in nutrition and aging, research, public health and Senior Nutrition Program implementation.

69. Question: Does the disclaimer noted in Section II. Award Information (Cooperative Agreement Terms) impact grantee intellectual property rights?

Answer: No. The disclaimer noted in Section II. Award Information of the NOFO does not relinquish intellectual property of the grantee. This disclaimer specifically emphasizes that the points of view or opinions of the grantee do not necessarily represent official Administration for Community Living (ACL) policy.

70. Question: Are we required to have an external evaluator for this grant?

Answer: No, you are not required to engage an external evaluator.