

Frequently Asked Questions

2022 Innovations in Nutrition Programs and Services - Research
HHS-2022-ACL-AOA-INNU-0017 UPDATED FEBRUARY 22, 2022

Unless otherwise stated, the responses address both Project Type A and Project Type B

A recording of the informational call held on 2/10/2022 is available at: 800-819-5739

Research partner video: <https://www.youtube.com/watch?v=OKnoNXfa36I>

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 the HHS-2022-ACL-AOA-INNU-0017 Project Type A and Project Type B?

Answer: No. Applicants may only apply for either Project Type A or Project Type B.

7. 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.

8. Question: Does an applicant need to directly receive Older Americans Act Title III funds?

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

9. 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?

Answer: 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.”

10. Question: 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.

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 Research model we will be doing?

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

14. Question: 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, Vita 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 five years of the project plan?

Answer: Applicants must include a Budget Narrative/Justification for years one, two, three, four, and five along with a combined Budget Narrative/Justification for the proposed 60-month budget period.

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

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

18. 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.

19. 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.

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. Question: Can the INNU grant project build on a previously funded ACL INNU project in a new and updated way or must it be a completely new concept?

Answer: The grant requirements do not exclude the project from being similar, but in a different aspect or new ideas added. It must meet the requirements stated in the Funding Opportunity Announcement.

24. 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.

25. What are the differences between Project Type A and Project B? What if our project could apply to either Project?

Answer:

The goal of Project Type A is to demonstrate that Congregate Meal Program services, practices or policies positively impact Senior Nutrition Program (SNP) participants by reducing hunger/ food insecurity/malnutrition, enhancing socialization and health and well-being. Projects must have strong potential for replication by the aging services network and sustainability using OAA Title IIIC-1 (congregate meal) funding.

The goal of Project Type B is to test and validate non-traditional programs, practices or policies that have emerged or experienced significant innovation during COVID-19 that have shown some level of effectiveness and have strong potential for replication by the aging services network and sustainability.

Applicants must decide whether to apply for Project Type A or Project Type B. Applicants may not apply for both Project Type A and Project Type B, or mix/match components required by the respective Projects.

26. Question: The NOFO mentions that one aspect of the SNP is to avoid or reduce the need for costly medical intervention. Do our projects need to demonstrate a reduction in healthcare costs?

Answer: While those goals are one piece of the overall intents of the Older Americans Act, in terms of enhancing overall health and well-being among other impacts, the specific Funding Opportunity Announcement applicants should follow the requirements of this specific NOFO. Applicants should establish goals, objectives and outcome measurements which are consistent with their project and meet the requirements of the NOFO.

27. Question: Would a grantee be able to include as part of their strategy during the 5 year plan, an environmental scan to see if there are other programs that should also be included in addition to the ones we know about?

Answer: There is nothing in the NOFO that would not permit a project from conducting an environmental scan; that is a project element which is up to the applicant. It is recommended that all potential applicants make it clear to those that are scoring the application that you will be fulfilling all of the grant requirements so that they can score the application accordingly. The reviewers need to understand how it would build any project tasks into meeting the goals and

objectives of your project.

28. Question: What does ACL mean when using the words: services, practices, programs and policies? How do we know what each means?

The following definitions may be used when determining whether a project includes a service, practice, program or policy:

- Service – a single component project, for example grocery delivery.
- Practice – a component of a service or program, may also be referred to as a process. An example is the use of a specific assessment tool, providing nutrition education online, delivering frozen meals, etc.
- Program – a multi-component project which contains a number of practices and/or services. For example, the home-delivered or congregate meal programs.
- Policy: a regulation or similar officially sanctioned and documented rule which must be followed by organizational staff, volunteers, etc.

29. Question: The NOFO mentions that one aspect of the SNP is to avoid or reduce the need for costly medical intervention. Do our projects need to demonstrate a reduction in healthcare costs?

Answer: While those goals are one piece of the overall intents of the Older Americans Act, in terms of enhancing overall health and well-being among other impacts, the specific Funding Opportunity Announcement applicants should follow the requirements of this specific NOFO. Applicants should establish goals, objectives and outcome measurements which are consistent with their project and meet the requirements of the NOFO.

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

Answer: In addition to reviewing HHS-2022-ACL-AOA-INNU-0017, 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. What if we have questions about the how best to implement 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, as well as ACL project officer assistance.

32. Question: How do we find the actual questions used in ACL's National Survey of Older Americans Act Participants? Are we required to identify only one question within each OAA intent area?

Answer: The survey instruments are available here: <https://agid.acl.gov/DataFiles/NPS/> Once a user clicks on the specific service that they want the data for they are taken to a screen that has both the data files for download as well as the survey instruments.

The number of data elements selected from each OAA intent area is up to the applicant agency in concert with their research partner(s).

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

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 here: https://acl.gov/sites/default/files/nutrition/NSIPGuidance_Dec2021_Final.pdf).

34. Should the same study continue for all 5 years of the grant?

Answer: That research framework should be decided by the applicant agency in concert with their research partner(s).

35. Question: Can we propose an evaluation measure that is not included in the NOFO?

Answer: Yes. If an applicant wishes to use other measures, the application must explain and demonstrate the validity of those measures and why they are justified. The rationale for and validity of the respective selected alternative measures should be included in the narrative.

36. Question: The NOFO required that applicants commit to incorporating at least one evaluation measure from each category to show the benefit of the innovation, but what if our innovation only applies to either nutrition, socialization OR health and well-being?

Answer: Applications must include incorporation of at least one evaluation measure for: a) food insecurity, malnutrition and hunger; b) enhancing socialization, AND c) promoting health and well-being. Evaluation measures from each of these three categories of participant impact must be included.

37. 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, replication tools are created during the grant period. Scaling/replication plans should be included in the grant application within the Project Narrative section on Sustainability. Network replication opportunities are intended to occur after the project is completed and will be based upon the project's evaluation results and the

grantee's creation of replication materials, both of which occur during the grant period.

38. 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.

39. Question: Our innovative programs could require policy changes (e.g., waivers) to Older Americans Act 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 innovations?

Answer: Proposed projects must have strong potential for replication by the aging services network and sustainability using OAA Title IIIC funding. It is unlikely that widespread replication would be feasible if national policy changes (eg waivers) were required. Potential state and local policy changes may be feasible; in these cases, applicants should include the feasibility of state/local policy changes in their Project Narrative.

40. Question: Can projects include congregate meals if they were not provided in the during COVID-19 thus far, as well as a few other minor innovative components not yet pilot-tested?

Answer: An existing congregate program is not required, however, you will need to identify and coordinate with your local Title III organization to identify if you can become a congregate meal provider organization or work with an existing congregate meal to conduct your project. Without an existing congregate meal program, grant reviewers may have concerns about the proposal's potential for success; developing a project that partners with existing Title III projects, or becoming one a Title III provider, may alleviate reviewer concerns.

41. Question: Must the proposed service, practice or policy have been implemented and evaluated previously, or do we have the opportunity to create a new partnership or program?

Answer:

Project Type A: The required research framework of an RCT or a cohort study reflects that the proposed service, practice or policy must have been implemented and undergone previous evaluation demonstrating a positive impact on participants by either the grant applicants, research literature and/or validated models (eg, SNAP-ed nutrition education, congregate meals program, home-delivered meals, nutrition counseling, etc). Suggested references include:

- CDC Community Preventive Services Task Force Findings Report, Effectiveness of Home-delivered and Congregate Meal Services for Older Adults, <https://www.thecommunityguide.org/content/tffrs-nutrition-home-delivered-and-congregate-meal-services-older-adults>

- Administration for Community Living, Program Evaluations and Reports, <https://acl.gov/programs/program-evaluations-and-reports#>. The requirement for a service, practice or policy to have been implemented does not preclude the opportunity for a new partnership to be proposed within an application.
- SNAP-ed Toolkit <https://snapedtoolkit.org/>

Project Type B: Testing and validating effective non-traditional SNP delivery models includes approaches that have been implemented and undergone some degree of evaluation that demonstrates a positive impact on participants. The requirement for a service, practice or policy to have been implemented does not preclude the opportunity for a new partnership to be proposed within an application

42. Question: How much preliminary data is sufficient to have been gathered during a program’s implementation to meet the requirements of this NOFO?

Answer: The amount and type of preliminary data is not specified in the NOFO. However, the application must describe the rationale and justification for proposing the particular project. In the application’s Problem Statement, the application should describe, in both quantitative and qualitative terms, the nature and scope of the project and the proposed project is designed to address. Lastly, data-informed analysis of the service, practice or policy proposed may enhance the likelihood the project would have strong potential for replication by the aging services network and sustainability using OAA Title IIIC funding, another key requirement.

43. Question: Would an innovation that has been identified as a possible need during COVID-19 but not yet implemented be an acceptable project?

Answer:

Project Type A: Unlikely, as previous evaluation is warranted prior to engaging in the required RCT or cohort study. However, a component of the project could contain an untested element that has been identified as potentially positively impactful for congregate meal participants’ nutrition, socialization and/or health and well-being.

Project Type B: Possibly. A service, program or policy which has not yet been implemented may be a component of an application as long as the proposed project’s proposed program, practice or policy has emerged or experienced significant innovation during COVID-19 and has shown some level of effectiveness on meal participants’ nutrition, socialization and/or health and well-being.

44. Question: Our plan is to submit a proposal that includes two different coalition partners, not within the same organization/agency. Is this acceptable?

Answer: The NOFO does not specify the number or types of partnerships, other than indicating the proposed project must involve a partnership between a University, Tribal College and University (TCU), or other research organization, in collaboration with an aging services network organization(s) – see the Funding Opportunity Description and Approach

Sections. In addition, if the applicant agency is not funded by OAA Title III funds then a key partner funded by OAA Title III funds must be included within the Letters of Commitment.

45. Our proposed program was originally led by the applicant organization [the State Unit on Aging] but was actually implemented by two partner agencies. Is this acceptable?

Answer: A proposed program may have originally been implemented at the local, AAA or state level. The applicant agency is not required to have originated the approach, but should have a strong understanding of implementation requirements.

46. Question: The NOFO required that applicants commit to incorporating at least one evaluation measure from each category to show the benefit of the project, but what if our project only applies to either nutritional health, socialization OR health and well-being?

Answer: Applications must include incorporation of at least one evaluation measure for: a) food insecurity, malnutrition, and hunger; b) social connection, AND c) health and well-being. Each of these three categories of participant impact match the intent of the Older Americans Act's Title IIIC senior nutrition program.

47. 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.

48. 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 plan. 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 two, 50% of participants by the end of year three, 75% of the participants by the end of year four, and 100% of the participants by the end of year five.

49. 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>

50. Question: Our project aims to serve home delivered clients for the purpose of enhancing home delivered meal services. Is that an acceptable approach to include in an application?

Answer: Possibly for Project Type B (Evaluate and Sustain Effective, Non-Traditional Senior Nutrition Program Delivery Models). Applications should include approaches to test and validate the effectiveness of policies in light of COVID-19 to modernize services and ensure that nutrition services are achieving their intended outcomes.

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

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

52. Question: With respect to geographic coverage area, can we focus on particular regions of the state or locality 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.

53. Question: Are logic models required as part of this NOFO?

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.

54. Question: Must the applicant plan to distribute research results via peer reviewed journals?

Answer: Yes. The project's results and findings should be disseminated in a timely manner, and in easily understandable formats to encourage replication. The applicant must discuss plans for how the research results will be published in peer-reviewed journals and be

consistent with ACL's Public Access Plan (<https://acl.gov/sites/default/files/about-acl/2017-12/ACLPublicAccessPlan.pdf>).

55. Health equity approaches are required. What resources are recommended for applicants to reference on this topic?

Answer: Projects must align with health equity approaches which are described at the following CDC website: <https://www.cdc.gov/chronicdisease/healthequity/index.htm>

56. 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.

57. Question: Are there populations that should be targeted for this NOFO?

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.

58. 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 (https://acl.gov/sites/default/files/nutrition/SNP%20Using%20Incentives_FINAL.pdf) 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.

59. 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://acl.gov/sites/default/files/SN/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

60. 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/grants/policies-regulations/hhsgps107.pdf>.

61. Question: Is the \$400,000-600,000 funding available for each year of the grant, if awarded, or is it \$400,000-600,000 for the entire 5 year project?

Answer: Under this competition, AoA/ACL will award cooperative agreements in the amount of \$400,000-\$600,000 for each of the five 12-month budget periods, subject to availability of funds. Successful applicants will receive grant awards totaling up to a maximum of \$3,000,000 over a 5-year period.

The range of funding is \$400,000-\$600,000 which is an average of \$500,000/grant x 4 = \$2 million estimated ACL budget in FY2022 for the first year of the awards. If the grantee is awarded the maximum of \$600,000/year x 5 years = \$3 million. The award ceiling is \$600,000/year and the duration is 5 years.

62. 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.

63. 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.

64. 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.

65. 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.

Questions Related to Letters of Commitment

66. Question: To whom should letters of commitment be addressed?

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

67. 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

68. 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.

69. Question: 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.

70. 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.

71. Question: 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.

72. 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>.

73. 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).”

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

Answer: You will find information on pages 8-9 on the NOFO. 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.

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

Answer: No, however no more than \$600,000 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 work plan with respect to project activities, outcomes, and products.

Miscellaneous Questions

76. 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.

77. 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.

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

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